



Pesticide
Action
Network
Europe

génération
FUTURES

Priorities for the upcoming French Presidency of the Council in the Pesticide area

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« Nous devons construire un chemin tous ensemble pour protéger nos sols, mais aussi nos activités agricoles (...) quand on trouve des substituts non-chimiques, quand on crée des cépages résistants, quand on modifie utilement le vivant, on peut se passer de pesticides tout en restant compétitif (...). **Ce n'est qu'au niveau européen que nous y arriverons, [la France portera] une initiative forte de sortie accélérée des pesticides** »

"We must build a path together to protect our soil, but also our agricultural activities (...) when we find non-chemical alternatives, when we create resistant grape varieties, when we usefully modifying organisms, we can do without pesticides while remaining competitive (...). **It is only at the European level that we will succeed, [France will] take a strong initiative to accelerate the phase-out of pesticides**".

E. Macron International Union for Conservation of Nature (IUCN) Congress,
Marseille 03.09.2021

This announcement by the French President E. Macron during the 2021 IUCN Congress has been positively received by PAN Europe. It is very much in line with and support the EU Farm to Fork Strategy, which proposes to set for the first time EU quantitative reduction targets for pesticides to achieve a sustainable food system¹. This statement was perceived as a **signal of a French intent to drive the European ambition forward on the phasing out of pesticides during its Presidency of the EU Council in 2022.**

Starting from January 2022, the 6-month rotating French presidency of the EU can be unique opportunity for France to turn the words of President Macron into concrete actions. Therefore, PAN Europe, together with Générations Futures, presents in this document its **priorities** on pesticides for the French Presidency of the EU (PFUE). These priorities and the resulting recommendations deal with the ongoing/forthcoming European Green Deal dossiers, the wider EU pesticide framework and examples where France could lead by example and be inspirational to other Member States, the EU and third countries. They are all intended to be **achievable or undertaken within six months.**

¹ PAN Europe, [Position on the EU Farm to Fork Strategy and the EU Biodiversity Strategy for 2030](#)

▪ Pesticide-free agriculture

France should drive the EU agricultural system toward an agriculture less dependent on pesticides. This first imply **aligning the National Strategic Plans with the European Green Deal** to ensure the CAP delivers on pesticide use reductions² and support sufficiently organic agriculture. To achieve this objective, the pesticide use reduction targets should become one of the national CAP objectives. This will enable to link clearly defined IPM measures³ to these targets.

Before end of March 2022, the European Commission will publish its proposal for a revised Sustainable Use of Pesticides Directive (SUD)⁴, notably to include the Farm to Fork pesticide reduction targets in the EU legislative framework. Upstream and downstream, France should commit to promoting the EU objective of at least **halving the use of all pesticides and the elimination of the more harmful ones**⁵. This could be done particularly (but not exhaustively) by defending in the Council EU binding targets implemented at each Member State level, measured through appropriate indicators⁶ and by **promoting a better IPM implementation**⁷ (monitoring and control). As part of this debate, France will also have the opportunity to zoom in the polluter pays principle and the potential of fiscal incentives⁸, as well as to ensure that pesticides are banned in specific areas. In addition, France will take over the EU debate on Statistical Agricultural Input and Output (SAIO) and should work for development of up to date, reliable, precise and public EU indicators regarding pesticide use reductions⁹.

Those are all key matters on which France has the capacity to be heard at EU level and to inspire other Member States. The same applies to glyphosate: the expiration of the active substance's approval by the end of 2022 should trigger an EU level discussion on an **EU plan to phase out pesticides**. Only a comprehensive, long-term, and detailed approach will enable to overcome the EU dependency on synthetic inputs and respond to the citizen's demand in this respect, as reflected in the [ECI Save and Farmers](#) and [Stop Glyphosate](#). Such plan will also help France gathering support among Member States and stakeholders or an **EU-wide ban of glyphosate by the end of 2022**. However, this will prerequisite banning all glyphosate-based herbicides at national level.

▪ Human health

The adverse health effects of pesticides on human health are diverse and scientifically well-documented. Although the 'cut off' approach of the pesticide Regulation should protect against most of these effects, much remains to be done to ensure that some rules are properly implemented in practice. This is the case of substitution, which must, under

² PAN Europe, [How the CAP should deliver on pesticide use reductions](#)

³ PAN Europe, [Using the CAP to turn the IPM triangle on to its solid base](#)

⁴ PAN Europe, [Position on the public consultation on the 'Sustainable use of pesticides – revision of the EU rules'](#)

⁵ Defined as pesticides containing cut off substances and candidates for substitution or exclusion.

⁶ PAN Europe, [Factsheet: which indicators to best measure the EU objective of pesticide use and risk reductions](#)

⁷ PAN Europe, [report on SUD evaluation](#) shows that France does call for better IPM implementation.

⁸ PAN Europe, [Pesticide taxation](#)

⁹ PAN Europe, [Contribution to the EU feedback mechanism on Statistics on Pesticides](#)

the French leadership be identified as a priority of Member States. This should be the subject of a joint written engagement by Member States to increase and publicly report on their efforts to substitute substances identified as **candidates for substitution**.

Furthermore, the revised proposal of the CLP Regulation will be published during the PFUE and constitutes the ideal framework to align the chemical framework with the latest scientific knowledge¹⁰. To not have to wait for the downstream consequences of such a revision, France should already call on the Commission to mandate EFSA to start systematically testing **developmental toxicity and immunotoxicity**. EFSA should also be urged to significantly accelerate its identification of **ED-pesticides**¹¹ and to publicly report on its progresses in a similar way to ECHA¹². Last but not the least, France should promote the immediate implementation of a mix assessment factor (MAF) by EFSA to prevent **cocktail effects**¹³, in line with the Chemical Strategy for Sustainability.

All this should be undertaken with a particular attention to **workers** suffering from occupational exposure, as well as **residents and bystanders**, who are also exposed to higher pesticide levels than the general population. Based on its national experience, France should alert other Member States on insufficiently protective approach of EFSA to obtain their support in the context of a review the 2014 Guidance document on the assessment of exposure of operators, workers, residents and bystanders¹⁴.

▪ Biodiversity

The intensive use of synthetic pesticides is one of the key drivers of biodiversity loss¹⁵. Yet too many active substances with clear adverse effects on the environment continue to be approved for use in the EU market following a poor environmental risk assessment. To address this shortcoming of the risk assessment, France should push for a higher consideration of independent scientific literature and the strict application of the precautionary principle. PAN Europe and GF also call on France to systematically **oppose to the renewal of active substances for which there is a lack of data and areas of concern** identified by EFSA. Moreover, the FPUE is an opportunity to act against EU derogations for active substances that have been banned or have received a negative opinion from EFSA.

Eventually, the European Green Deal suggests going even further to align the pesticide regulation on the new Biodiversity Strategy for 2030. To that end, France should promote the adoption an **EU-wide legislative framework on soil** and of **biodiversity restoration targets** which both take into consideration and address the impact of pesticides.

¹⁰ PAN Europe, [Feedback on the roadmap on the Revision of EU legislation on hazard classification, labelling and packaging of chemicals](#)

¹¹ The lack of data cannot be interpreted as an absence of endocrine disrupting effects or a proof of safety.

¹² [Endocrine disruptor assessment list - ECHA \(europa.eu\)](#)

¹³ PAN Europe, [How to best address cocktails effects in the Pesticide legislation?](#)

¹⁴ Incl. minimum non-spraying buffer of 25 meters should be applied to houses, playing grounds and public areas.

¹⁵ PAN Europe, [Pesticides and the loss of biodiversity](#)

- **Double standards**

Food imported in the EU should fully comply with EU regulations and health and environmental standards. Together with a comprehensive reform of the EU's trade policy, the exception regimes laid down in the pesticide framework should be lifted to ensure that **no residues of pesticides banned in the EU can be imported in food products and feeds**. Building on the Commission's outreach activities carried out with third countries and its proposal to withdraw the import tolerances of clothianidin and thiamethoxam, the PFUE must use its leadership role to move from a substance-by-substance approach to a general **policy of zero acceptance of import tolerances**. France should ensure that the EU Commission quickly delivers its proposal of a revision of the PIC Regulation integrating a **ban of export of all chemicals non-approved in the EU**, including pesticides, as laid down in the Commission Chemical Strategy for Sustainability.

- **Environmental labelling**

By driving both the demand and the supply, environmental labelling is a powerful tool to shape a sustainable agri-food system. Its indicators are the reflect of a vision on what such sustainable system should look like. Therefore, endorsing a labelling scheme which takes into high consideration the impact of pesticides would mirror the political commitment of France to make of pesticide phase out a priority. For this reason, PAN Europe and Générations Futures, recommend the adoption of the **Planet Score** at national level. In parallel, France should use its presidency to accelerate the discussion on the **EU sustainable labelling** for agricultural products.

With this paper, PAN Europe and Générations Futures hope to have shared with the French government practical guidelines to turn the French ambitions and commitments into concrete actions. **At the mid-term of the French Presidency, we will analyse whether France has seized these opportunities.** This will both concern what should be praised and what should be improved.

Contact us

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Pesticide Action Network (PAN) Europe is a network of NGOs working to reduce the use of hazardous pesticides and have them replaced with ecologically sound alternatives. We work to eliminate dependency on chemical pesticides and to support safe sustainable pest control methods. Our network brings together 40 consumer, public health, and environmental organisations, and women's groups from across Europe.