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Pesticide Action Network reaction to the harmonized risk indicator adopted to measure compliance with the EU Directive on the Sustainable Use of Pesticides

The EU Directive on Sustainable Use of Pesticides (SUDP) was adopted in 2009 ⁽¹⁾ with the aim of reducing the use and harmful impacts of pesticide use across the EU. Article 15 of the SUD calls for the establishment of a set of harmonised risk and use indicators to monitor the impact of the Directive on pesticide use.

Within the Standing Committee on Plants, Animals, Food and Feed (SCoPAFF), held on 25th January 2019, the majority of EU Member States approved the following set of Harmonised Risk Indicators (HRI) ⁽²⁾:

- An indicator measuring the sales data (quantities of active substances placed on the market in kg or tonnes) accumulated as one weighted average (HRI 1), and
- An indicator measuring the number of essential use derogations given for restricted or banned active substances in the same period (HRI 2).

The European Parliament and the Council now have three months to challenge this decision. If there is no opposition from these two institutions it will mean that EU will finally be able to start monitoring pesticide sales and partly use trends.

It is clearly mentioned on DG SANTE's webpage that in the future and when data becomes available, it is envisaged to have indicators based on use ⁽³⁾.

PAN reaction

Pesticide Action Network Europe (PAN Europe), PAN Germany and PAN UK welcome the vote.

PAN encourages the European Parliament and the Council to back the HRIs being adopted, reminding both of the institutions that they both recently recognised the need for progress in the implementation of the SUDP ⁽⁴⁾.

PAN reminds that the adoption of the HRIs is a first step in delivering transparency and better reporting of pesticide use whilst incurring no unwarranted burden in terms of cost or time for farmers and other users of pesticides ⁽⁵⁾.

PAN Europe, PAN Germany and PAN UK have developed a joint position paper ⁽⁶⁾ proposing how the harmonised risk indicator (HRI) needs to be improved to ensure that one day civil society and others will be able to monitor how pesticides are used in the EU or how their use is changing over time.



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Note to editor:

- (1) From DG SANTE's homepage, [here](#)
- (2) The Harmonised Risk indicators (HRI) will be calculated by dividing the active substances into 4 Groups: Low-risk active substances, approved active substances, active substances which are considered candidates for substitutions and active substances which are considered not to be approved onto the market. These are divided in 7 Categories.
HRI 1 will be calculated by multiplying the annual quantities of active substances placed on the market for each Group using a hazard weighting of 1:8:16:64. HRI 2 will be calculated by using the same factors as HRI1, but this time multiplying by the number of derogations.
The idea is over time to merge the two HRIs into one indicator being able to use it as one of the impact indicators of the EU's future Common Agricultural Policy.
- (3) From DG SANTE webpage, [here](#)
- (4) The Report on Implementation of the Directive 2009/128/EC on Sustainable Use of Pesticides (SUD) of the 21 October 2009 prepared by the European Commission and sent to the European Parliament and the Council the 10 October 2017 ([COM\(2017\) 587 final](#)) calling for progress including development of HRI was welcomed by both the [EU Council](#) on agriculture (on 6 November 2017) and the [European Parliament](#) (on 13 November 2017). Both have discussed the report and both confirmed their engagement towards ensuring serious implementation in the future. The European Parliament is preparing an own initiative report ([2017/2284\(INI\)](#)).
- (5) We recall the [Report](#) from The Commission to The European Parliament and The Council on the implementation of Regulation (EC) No 1185/2009 estimating the cost and burden to both member states and farmers in the delivery of pesticide sale and use statistics to be relatively limited.
- (6) PAN Europe, PAN Germany and PAN UK's joint position paper is available [here](#).