

LOW IMPACT FARMING

PAN EUROPE'S POSITION ON

THE PROPOSAL FOR
A NEW DELIVERY MODEL
FOR THE CAP
AFTER 2020



Pesticide
Action
Network
Europe

October 2018

PAN Europe's position on THE PROPOSAL FOR A NEW DELIVERY MODEL FOR THE CAP AFTER 2020

This position paper responds to the legislative proposals¹ on the CAP strategic plans released by the European Commission on 1st June 2018, with a focus on pesticide use, while also proposing fundamental improvements in the CAP to encourage the much-needed agro-ecological transition.

On June 1st 2018, the legislative proposals (COM/2018/392 final – 2018/0216 (COD)) on the rules governing support for strategic plans to be drawn up by Member States under the Common Agricultural Policy (CAP Strategic Plans) were published.

The New Delivery Model (NDM) is presented as a result-based approach. One of the few innovations in these legislative proposals is the much higher flexibility given to Member States on how to support farmers in the future. However, they provide little inspiration regarding the transition towards low-impact farming.

The idea is that each Member State should prepare a national strategic plan using 9 EU-wide objectives measured by 28 **impact** indicators, and that this plan will be assessed and approved by the Commission and then monitored annually. However, performance will be assessed using **result** indicators (intended to measure yearly progress in achieving the overall objectives of the CAP by the Member States) and **output** indicators (intended to measure multiannual progress and policy results). These are found in Annex I of the legislative proposal for the CAP strategic plans regulation).

The idea of a strategic plan is only of value if the indicators are strong enough to measure environmental and climate-friendly progress/change/transition, and if each Member State sets serious reduction targets and timetables for the uptake of environmental practices including reduced pesticide use for each farmer.

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2018%3A392%3AFIN>

1 Why should the EU's Common Agricultural Policy address pesticide use reductions?

In the EU, we pay around €60 billion each year to support our farmers. The majority of these payments are made to the same European farmers who each year buy around 400,000 tonnes of active chemical substances which are applied to the fields, influencing negatively public health, the environment and biodiversity. They also come with an economic cost for society at large. It is illogical for public funds to be spent on practices which pollute.

- Studies in the UK and Germany show that costs of pesticide use on people and the environment are US\$257m and \$166m, respectively (Pretty & Waibel, 2005).
- UK water companies spent £189m removing nitrates and £92m removing pesticides from their water supplies between 2004-2005 and 2008-2009 (National Audit Service, 2010) (+/- €350m)

A few examples of the costs to society for pesticide use

*Netherlands: Dutch consumers pay more for their tap water because farmers continue to use toxic pesticides like Roundup in their pastures, according to water company Vitens. Cleaning up the groundwater costs Vitens around €15m extra every year, according to De Gelderlander².

Transition

It is fundamental that the €60 billion in the CAP each year, especially now that it is being promoted as a result-based policy, should support farmers financially and technically in their conversion to low-impact farming systems, continuously reducing their dependency on pesticides through the uptake of agro-ecological and organic production techniques.

² <https://nltimes.nl/2018/04/23/dutch-tap-water-expensive-due-poison-pastures-water-company>

2 How does the current Common Agricultural Policy deliver on pesticides?

A PAN Europe reflection paper³ clearly shows that the current CAP does not deliver on pesticide use reductions.

The EU Directive 2009/128/EU on the sustainable use of pesticides (SUD⁴) specifies that farmers need to apply the eight principles of Integrated Pest Management (IPM)⁵, and that Member States have to assist farmers to achieve this. The SUD says:

- Member States shall take all necessary measures to promote low pesticide-input pest management, giving wherever possible priority to non-chemical methods allowing all farmers to apply Integrated Pest Management as from January 2014 (article 14).
- Member States shall establish appropriately-sized buffer zones to protect non-target aquatic organisms and safeguard zones for surface and groundwater used for the abstraction of drinking water, where pesticides must not be used or stored (article 11).

Recital (35) of the EU Regulation 1107/2009 on pesticides, relating to the principles of integrated pest management, states unequivocally:

“The Council should include in the statutory management requirement referred to in Annex III to Council Regulation (EC) No 1782/2003 of 29 September 2003 establishing common rules for direct support schemes under the common agricultural policy and establishing certain support schemes for farmers (1), the principles of integrated pest management, including good plant protection practice and non-chemical methods of plant protection and pest and crop management.”

In reality, Member States still have to identify the mandatory and voluntary aspects of IPM, and integrate these into the Common Agricultural Policy. So far, Member States are only obliged to inform farmers about IPM (see regulatory details in annex).

3 <https://www.pan-europe.info/sites/pan-europe.info/files/Why%20the%20CAP%20is%20broken%20on%20pesticides.docx.pdf>

4 https://ec.europa.eu/food/plant/pesticides/sustainable_use_pesticides_en

5 <https://link.springer.com/article/10.1007/s13593-015-0327-9>
https://www.researchgate.net/publication/280315978_Eight_principles_of_integrated_pest_management

3 How much do the CAP legislative proposals need to be improved to target serious pesticide use reduction?

The legislative proposals should be amended as follows to allow for serious pesticide use reductions in the EU model of farming:

3.1 Ambition

Firstly, in the CAP regulation, the level of ambition must be high. The law must lay down the duty for the Commission to ensure that ALL the objectives are covered in a satisfactory and ambitious way, across all sectors, at the stage when they check national CAP strategic plans, for example to ensure targets are set by the Member States that aim at significant improvements in the uptake of alternative measures, and significant pesticide use reductions, with clear timelines. Secondly, the Commission must be empowered to keep the Member States' ambition and delivery high over the medium term.

3.2 Indicators

Each National Strategic Plans must contain serious quantitative targets and timetables for pesticide dependency reductions and uptake of agro-ecological techniques and organic agriculture, combined with solid indicators related to measures from both funds on significant pesticide dependency reductions to measure the transition.

3.3 Cross Compliance (SMR+GAEC⁶)

Each arable farmer must be obliged to apply long crop rotations including leguminous crops, while farmers with permanent crops must be required to increase biological and structural diversity.

3.4 Eco-schemes and Agri-Environmental Measures (AEM)

Each Member State should offer financial support to farmers for the uptake of non-chemical alternatives to pesticides (agronomic, mechanical, physical, biological), as part of an overall strategy moving towards smarter agro-ecological production systems, from integrated pest management (IPM) through to organic farming. The move to zero pesticides needs to be facilitated by a package of measures.

⁶ Statutory management requirements (SMR) are parts of existing EU directives and regulations that are deemed relevant for farmers to respect in order to receive full CAP payments. Good agricultural and environmental conditions are good farming practices that likewise must be respected in order to receive full payment.

3.5 Risk Management Scheme

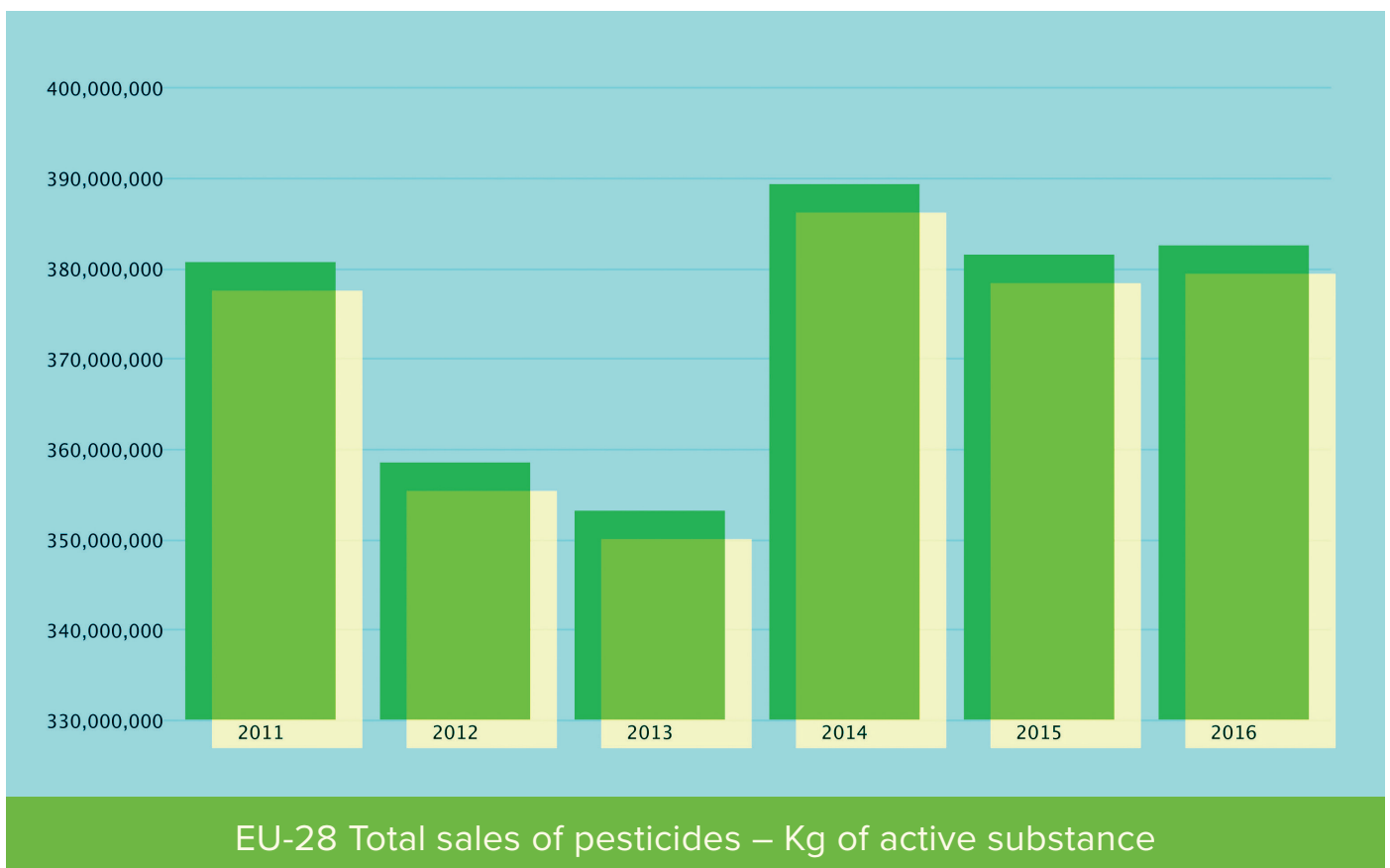
Should be taken from first pillar payments, having as the objective preventative actions in line with Veneto IPM⁷.

3.6 Independent Farm Advisory Systems (FAS)

Should be introduced across the EU, enabling farmers in taking up alternative production systems. The starting point would be applying existing provisions like IPM, the sustainable use of pesticides, the water framework directives and the restrictions on neonicotinoids. Over time, the transition towards genuinely low impact farming systems would be ensured, with organic systems being used as demonstration projects.

3.7 Budget sharing

Should be fair so that the budget cuts should only be in Pillar I, while there should be total protection – and if possible an increase – in Pillar II funding. The overall sum of the Eco-scheme and the Agri-Environmental Measures within the rural development programme must be ring-fenced at 70% of overall budget, at the least.



7 <https://www.pan-europe.info/sites/pan-europe.info/files/public/resources/briefings/pan-e-risk-management-tool.pdf>

4 A detailed proposal for improving the CAP legislative proposals in order to target truly effective pesticide use reduction

4.1 Ambition

In the European Citizens' Initiative⁸, 1.3 million EU citizens have called for **“Set EU-wide mandatory reduction targets for pesticide use, with a view to achieving a pesticide-free future”**. The European Commission replied:

“EU policy is already directed towards reducing dependency on pesticides and achieving a pesticide-free future as requested by the European Citizens' Initiative. The Commission will strive to ensure that Member States comply with their obligations under the Sustainable Use Directive and reduce dependency on pesticides.”

The impact assessment which accompanied the legislative proposals recognised:

“As stated during the public consultation and in the Communication on the Future of food and farming, the CAP is expected to respond better to consumer demands on food and health. Related societal expectations stretch over various food-related aspects such as food security, safety and quality, affordability of food, health issues such as pesticide load and antimicrobial resistance.”

However, this concern did not make it into the draft of the legislative proposal published in June 2018. That must be remedied and pesticide reduction must be put back in.

According to the SUD, farmers need to apply the eight principles of IPM, and to move towards alternative approaches and techniques to reduce their dependency on pesticides.

It is fundamental that the €60 billion in the CAP each year, especially now that it is being promoted as a result-based policy, should support farmers financially and technically in their conversion to low-impact farming systems, continuously reducing their dependency on pesticides through the uptake of agro-ecological and organic production techniques.

⁸ http://europa.eu/rapid/press-release_IP-17-5191_en.htm

4.2 Introduction of true output indicators on pesticide use reductions

In the legislative proposals, pesticide use is neither mentioned in the indicators linked to biodiversity (e.g. pollinators) nor in the indicators linked to water. Sustainable pesticide use is only mentioned as an indicator within “societal demands on food and health, including safe, nutritious and sustainable food” (I.27). The result indicator (R.37) for Sustainable pesticide use states: **Share of agricultural land concerned by supported specific actions which lead to a sustainable use of pesticides in order to reduce risks and impacts of pesticides’** without specifying what the specific actions are. At the same time, the “Output indicator” is missing.

PAN Europe calls for an output indicator on pesticide dependency reductions introduced to measure compliance with article 14 of the SUD and the 8 principles of IPM (IPM triangle), linking this to the development of a new specific measure within rural development (see point 4 below).

4.3 Cross compliance rules relating to pesticides a Statutory Mandatory Requirements

In the new CAP legislative proposals regarding CAP beyond 2020 published by the European Commission in June 2018⁹, the European Commission again proposes to integrate the following pesticide-related aspects into the SMRs.

SMR 12
(CURRENTLY
SMR 10)

Regulation (EC) No 1107/2009 of the European Parliament and of the Council of 21 October 2009 concerning the placing of plant protection products on the market:

• Article 55, first and second sentence:

“Plant protection products shall be used properly. Proper use shall include the application of the principles of good plant protection practice and compliance with the conditions established in accordance with Article 31 and specified on the labelling.”

Note the last sentence of that same article is not included:

“It shall also comply with the provisions of Directive 2009/128/EC and, in particular, with general principles of integrated pest management, as referred to in Article 14 of and Annex III to that Directive, which shall apply at the latest by 1 January 2014”

SMR 13
(NEW)

Directive 2009/128/EC of the European Parliament and of the Council of 21 October 2009 establishing a framework for Community action to achieve the sustainable use of pesticides (OJ L 309, 24.11.2009, p. 71):

- Article 5(2), – Article 8(1 to 5)
- Article 12 with regard to restrictions on the use of pesticides in protected areas defined on the basis of the Water Framework Directive and Natura 2000 legislation.
- Article 13(1) and (3) on handling and storage of pesticides and disposal of remnants.

⁹ https://ec.europa.eu/info/food-farming-fisheries/key-policies/common-agricultural-policy/future-cap_en

So, again, there is no specific reference to article 14 of the SUD, which states that farmers must apply Integrated Pest Management as of January 2014, despite the fact that Regulation 1107/2009 specifies that this should be done. Indeed, this same article should have been the basis of informing farmers about IPM, through farm advisory systems (FAS) since the 2013 reform¹⁰. Instead the new CAP legislative proposals propose – as can be seen from the above table – that farmers by definition are achieving IPM simply by receiving training (article 5), checking their equipment (article 8), respecting restrictions on the use of pesticides in protected areas (articles 12), and handling and storing pesticides carefully (article 13). Nothing about actual implementation of IPM.

This is simply not good enough. There needs to be a clear and explicit link to IPM measures. Only this will help allow us to catch up on the long overdue and weak implementation of IPM.

PAN Europe calls for the Statutory Mandatory Requirements to make reference to article 14 of the SUD, which states:

“Member States shall take all necessary measures to promote low pesticide-input pest management, giving wherever possible priority to non-chemical methods, so that professional users of pesticides switch to practices and products with the lowest risk to human health and the environment among those available for the same pest problem.”

Member States should define rules encouraging farmers to reduce pesticide dependency, by promoting uptake of the eight IPM principles as defined in Annex III of the SUD, recalling principle 8:

“Based on the records on the use of pesticides and on the monitoring of harmful organisms the professional user should check the success of the applied plant protection measures.”

PAN Europe calls for SMR 12 to include article 55 of Reg.1107/2009 in its entirety, as well as adding article 14 of the SUD to SMR 14.

Also, PAN Europe calls for the addition to SMR 12 of the part of article 67 of Reg.1107/2009 which states:

“Professional users of plant protection products shall, for at least 3 years, keep records of the plant protection products they use, containing the name of the plant protection product, the time and the dose of application, the area and the crop where the plant protection product was used. They shall make the relevant information contained in these records available to the competent authority on request. Third parties such as the drinking water industry, retailers or residents, may request access to this information by addressing the competent authority.”

10 CAP horizontal Regulation in force, compulsory requirements of FAS: Reg.1306/2013 Art.12(2)e

Doing so would be a fundamental tool for monitoring adherence to the cross-compliance rules. This would allow authorities on Member State and EU level as well as concerned citizens to track performance of the CAP in terms of pesticide use reductions across the EU.

Farmers collection of pesticides use – example from Ireland

Since 2003, farmers have been obliged to maintain records of pesticides used. Farmers are inspected through the farm payments section (Integrated Controls Division) but are additionally subject to inspection from personnel from this division as well as local authorities etc. Ireland conducts a pesticide usage survey on an annual basis and these survey results are available on our website.

b Good Agronomic and Environmental Conditions (GAEC standards)

The legislative proposals in the GAEC requirements (GAEC 8), which farmers need to comply with in order to obtain full direct payments, suggest a reversion to the 1999 requirements specifying crop rotation. PAN Europe strongly welcomes this move.

The legislative proposals also add a GAEC requirement to include non-productive features or areas (GAEC 9). These have existed since 2003 in the form of landscape features (these are paid for as if they were productive land, to prevent farmers from removing all non-productive elements). This is another positive aspect, except for the fact that neither these nor the establishment of buffer strips along water courses (GAEC 4) are specified as having to be pesticide-free. These non-productive areas act as refuges or habitats for beneficial species, including pollinators and natural predators of pests, which boost the productivity of adjacent crops¹¹. The non-application of pesticides on those areas is essential to allow those species to flourish by avoiding direct mortality of helpful insects or the plants they live on. Non-application of pesticides on buffer strips alongside watercourses is important to avoid direct exposure of aquatic species to substances that will kill them.

PAN Europe welcomes the concept of (re-)introducing crop rotation into GAEC, but we recall the pesticide-free aspect of the Ecological Focus Areas introduced in 2018, and call for these legislative proposals to be expanded (PAN's proposals are added in orange):

¹¹ Increases in productivity of +11% wheat, +26% in peas and +32% in carrots: table 2, pg 13. https://ec.europa.eu/eip/agriculture/sites/agri-eip/files/eip-agri_fg_ecological-focus-areas_final-report_en.pdf

GAEC 8	<p>At least four years' Crop rotation with leguminous crops on all arable land</p>	<p>Preserve the soil potential Break pest reproductive cycles Decrease susceptibility to pest attack Increase nitrogen fixing Provide animal fodder</p>
GAEC 9	<p>Minimum share of agricultural area devoted to non-productive features or areas where agrochemicals are not to be used Retention of landscape features Ban on cutting hedges and trees during the bird breeding and rearing season As an option, measures for avoiding invasive plant species</p>	<p>Maintenance of non-productive features and area to improve on-farm biodiversity, especially boosting functional biodiversity and beneficial species</p>
GAEC 4	<p>Establishment of buffer strips along water courses with no pesticide or fertiliser use</p>	<p>Protection of river courses and aquatic species/ecosystems against pollution, toxicity and run-off</p>

PAN Europe notices that many of the GAECs being proposed are limited in scope, often only targeted at a single aspect, while the holistic approach is missing. For instance GAEC 5, linked to the use of farm sustainability tools for farms and proposing all farmers develop a nutrient management plan.

PAN Europe and its members propose that GAEC requirements become holistic and agro-ecological in scope, thereby allowing farmers to start thinking in terms of system change towards effective input use reduction.

4.4 Eco-schemes and Rural Development programmes a Eco-schemes

The legislative proposals identify a new first pillar measure, Eco-schemes, mandatory for Member States to offer, but voluntary for farmers to apply.

- PAN Europe encourages a strengthening of the legislative proposal linking the Eco-schemes to the “assessment of needs” defined in article 96 in the CAP strategic plan proposal. This would support farmers having clear input reduction plans with timetables of action, and would be a key to encouraging the much-needed transition towards low-impact farming.
- We call for this measure to become mandatory for farmers.
- Finally, we call for ring-fencing 70% of all CAP spending to the Eco-scheme and Agri-Environmental measures as defined in article 86.

b Rural Development

Currently there are around 120 rural development programmes but little to clarify how Member States and regions are offering funding to farmers for their uptake of IPM and pesticide use reductions. The European Commission conducted fact-finding missions in Member States in 2017 regarding the implementation of the SUD, and reported¹² as follows:

The German fact-finding report on the Sustainable Use of Pesticides¹³ states (point 61): **Growers can claim additional payments for IPM-related measures such as using biological controls against the European corn borer in maize and pheromones in orchards to control codling moth, establishing buffer zones adjacent to water courses, and including flower strips in arable fields.**

In Lower Saxony, growers can claim additional payments for crop rotation practices and including flower strips in arable fields. At a national level, 25% of UAA is implementing some measure under Rural Development programmes, many of which contain measures complementary to IPM.

The Swedish fact-finding report on the Sustainable Use of Pesticides¹⁴ states (point 48): **Farmers can receive additional payments under Rural Development programmes for measures taken under the scheme. Participating farmers receive a series of visits to guide them in improving their practices and attend farmer-led group discussions on specific problem areas. While the primary focus is nutrient use efficiency, several aspects of IPM, including crop rotation, crop nutrition, plant protection and conserving biodiversity are incorporated into this scheme.**

All too often, the current measures within rural development that Member States activate to encourage pesticide use reductions seem overly bureaucratic, or focusing on one method, therefore by nature lacking dynamism. As a result, these schemes are not capable of integrating new non-chemical alternatives into the systems in the short term, nor are they able to support farmers effectively in their transition towards the uptake of alternatives and the development of organic production systems.

PAN Europe calls for a specific measure within the rural development scheme targeted at real pesticide use reductions, coupled with clear timetables showing the transition.

¹² Other examples from rural development schemes to reduce herbicides in France, Luxembourg and Belgium can be found in the report on Alternatives to Herbicide Use in Weed Management – The Case of Glyphosate https://www.pan-europe.info/sites/pan-europe.info/files/Report_Alternatives%20to%20Glyphosate_July_2018.pdf

¹³ http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3896

¹⁴ http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3909

Also, we call for Member States and/or regions to stop offering rural development funding to farmers who use chemical inputs, as has already been done in some regions¹⁵.

4.6 Risk management

The legislative proposals make risk management tools a mandatory rural development scheme. This would make the measure compulsory for all Member States to offer but voluntary for farmers to use. Some of the best ways of mitigating the risk of pest attack and climate-change-linked weather events involve adopting agro-ecological techniques that increase the resilience of the whole production system. Insurance schemes might fossilise bad practices such as year-on-year monocultures or poor care of soil, meaning increased expenditure and no improvement, so conditions must be built in to insurance to ensure farmers are taking mitigation actions in the first place.

PAN Europe calls for this scheme to be included in the 1st pillar, so paid for from first pillar payments, and having as its objective preventative actions. This is in line with regional approaches such as Veneto (Italy) where IPM measures are a pre-condition¹⁶.

4.7 The European Innovative Partnership (EIP) on Agriculture and development of a truly independent Farm Advisory Service (FAS)

Since 1999, all Member States have been obliged to set up so-called Farm Advisory System (FAS), which assist farmers in fulfilling legislative requirements, especially as related to the environment¹⁷. As part of the 2013 reform of the CAP, this baseline was updated and as from 2015, Member States must advise on Integrated Pest Management, as called for in Article 55 of Regulation 1107/2009 on plant protection products and Article 14 of Directive 2009/128/EC on the sustainable use of pesticides.

These requirements are being maintained in the new CAP legislative proposals, and the aspect of ‘independent advice’ is being reinforced. However, while the potential of the FAS is huge in the development of independent advice, the actual implementation remains very limited. Only a few Member States, like the United Kingdom¹⁸, have made the FAS visible, by establishing an easy-to-find homepage. Even the

15 https://firenze.repubblica.it/cronaca/2018/08/12/news/rossi_la_toscana_vieta_l_uso_del_glifosato_del_in_agricoltura_e_cancerogeno_-203946328/?refresh_ce: “Noi, come Regione Toscana faremo subito un provvedimento per escludere dai premi del Piano di Sviluppo Rurale le aziende che ne facciano uso”

16 <https://www.pan-europe.info/sites/pan-europe.info/files/public/resources/briefings/pan-e-risk-management-tool.pdf> see toxic free towns: <https://www.low-impact-farming.info/non-toxic-areas>

17 https://ec.europa.eu/agriculture/direct-support/cross-compliance/farm-advisory-system_en

18 <https://www.gov.uk/government/groups/farming-advice-service>

Member States who have taken some action are only focusing on how to apply pesticides “better”, rather than actually reducing application by promoting the uptake of agronomic and physical alternatives to chemical pesticides.

PAN Europe welcomes the effort being made in developing independent Farm Advisory Services across Europe, and we call for this to be financed by public funding, to avoid undue industry influence.

However, training, advice and voluntary measures alone will not be enough to make the European model of farming deliver on its environmental and climate obligations¹⁹. Mandatory actions are needed, including making sure that all conventional farmers throughout Europe seriously reduce their pesticide use and all Member States set clear and ambitious targets for mainstreaming better practices.

Example of an FAS model encouraging transition

In 2011-2013 the Danish organic movement conducted an EU-financed pilot project assisting conventional farmers to consider converting to organic. Agreements were made with 12 Danish towns mainly as part of a campaign to protect their drinking water from contamination with pesticides (see toxic free towns) – altogether offering around 3000 farmers a conversion check and assistance from the Danish organic movement in the conversion.

The project is still ongoing. Now 30 towns are engaging with them, each year around 200 conventional farmers take up the offer, with the majority of them deciding to convert. Today around 9% of all Danish Agricultural Utilised Areas are cultivated organically.

4.8 Budget sharing – a strong Rural Development pillar

It is important for budget sharing to be fair, so all the budget cuts should be only in Pillar I, with total protection – and if possible an increase – for Pillar II funding. The overall sum of the Eco-scheme and the Agri-Environmental Measures within rural development programmes must be ring-fenced to at least 70% of the overall budget.

¹⁹ https://www.researchgate.net/publication/271728601_Incentives_and_policies_for_integrated_pest_management_in_Europe_A_review

ANNEX

In the 2013 reform of the Common Agricultural Policy (CAP), Member States did not accept the European Commission's proposal to integrate the SUD (Sustainable Use of Pesticides directive) and the Water Framework directive into the mandatory cross-compliance rules.

Instead it was agreed that the SUD would become part of the cross-compliance requirement only after Member States had defined farm-level rules:

“The Council and the European Parliament invite the Commission to monitor the transposition and the implementation by the Member States of Directive 2000/60/EC of 23 October 2000 establishing a framework for Community action in the field of water policy and Directive 2009/128/EC of the European Parliament and of the Council of 21 October 2009 establishing a framework for Community action to achieve the sustainable use of pesticides and, where appropriate, to come forward, once these Directives have been implemented in all Member States and the obligations directly applicable to farmers have been identified, with a legislative proposal amending this regulation with a view to including the relevant parts of these Directives in the system of cross-compliance.”

(Addendum 2 to the CAP reform agreement of 25th June 2013)

A positive element of the compromise deal was that it would be mandatory for Member States to inform farmers about reducing pesticide use and introducing Integrated Pest Management as part of the information shared via the Farm Advisory Systems (FAS), which needed to advise on:

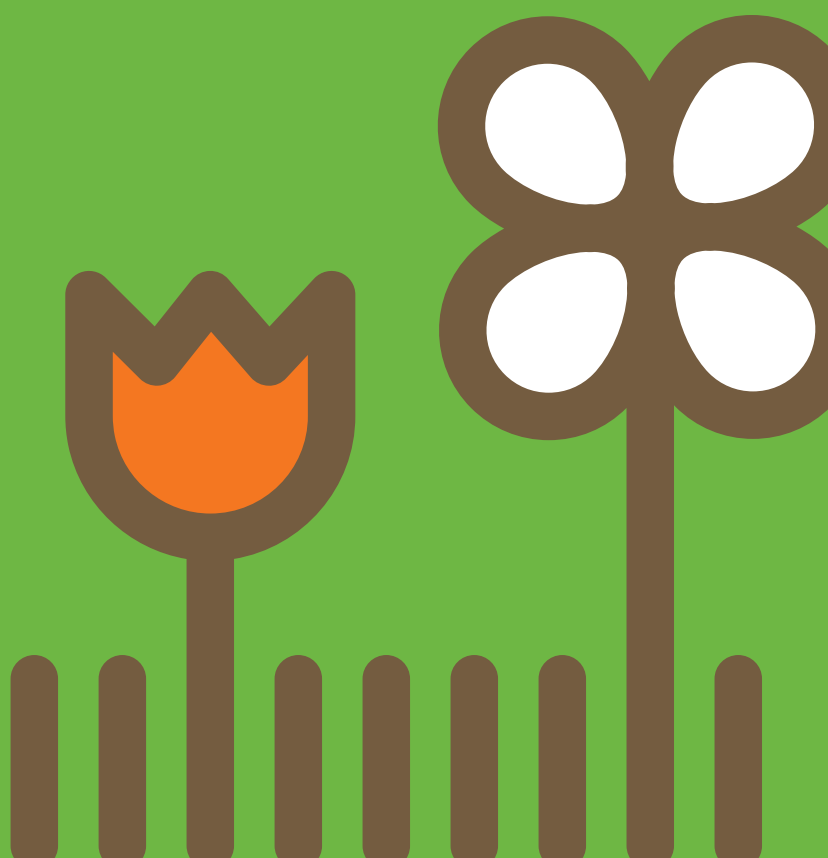
“Implementing Article 55 of Regulation (EC) No 1107/2009 of the European Parliament and of the Council (6), in particular requirements concerning the compliance with the general principles of integrated pest management as referred to in Article 14 of Directive 2009/128/EC of the European Parliament and the Council (7)”.

This was translated into law as follows: Regulation 1306/2013, which applies as from 1st January 2015, stipulates in recital (11) that:

“The farm advisory system (FAS) should cover at least the obligations at farm level resulting from cross-compliance standards and requirements. ... That system should also cover the requirements imposed on beneficiaries by Member States in order... for implementing Article 55 of Regulation (EC) No 1107/2009, in particular requirements concerning the compliance with the general principles of integrated pest management as referred to in Article 14 of Directive 2009/128/EC of the European Parliament and the Council”.

For inspirations on how to move to low impact farming
www.low-impact-farming.info

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