



PAN Europe contribution to the EU feedback mechanism on Statistics on Pesticides – updated list of active substances

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Statistics on pesticides

The European Commission has published a proposal for amending Regulation (EC) No 1185/2009 concerning statistics on pesticides. All that is being proposed is an upgrading of the list of active substances¹. The European Commission is neither using this opportunity to upgrade pesticide use statistics nor to challenge Member States on the ways current pesticide statistics are collected and released. PAN Europe proposes to significantly improve the legislative proposal as follows.

The time delay is unacceptable

Article 7 of Regulation (EC) No 1185/2009 foresees that: *'The Commission shall submit a report on the implementation of the Regulation to the European Parliament and the Council every five years.... It shall, if appropriate, contain proposals designed to further improve data quality and data collection methods thereby improving the coverage and comparability of data and reducing the burden on businesses, agricultural holdings and national administrations. With the first report to be published in 2016'*

This [REPORT](#) made, among others, the following recommendations:

- The Commission, taking into account the opinion of the relevant stakeholders, considers it important to further adapt the legislation on pesticides sales, so that all data that is not confidential can be made available to the public both as active substance, as well as in different forms of aggregation.
- The Commission considers it equally important to adapt further the legislation on pesticides use statistics to ensure a more consistent approach and coverage across the Member States.

However, the legislative proposals are only being proposed now, where a new report should be published. PAN Europe wonders why no new report is being issued, and why the legislative proposal is limited to an update of the annex rather than trying to meet the conclusions from the 2017 report?

Pesticide use statistics

Member States are according to article 3(1) of the regulation in question obliged to collect sales data on an annual basis and use data each five years. Member States can collect these data by either collecting it directly from farmers or by surveys. The European commission is now proposing to update the list of active substances but without any proposing to upgrade the pesticide use statistics despite this being highlighted in its first report.

The legislative proposal does propose to add a few lines in the annex regarding where the pesticides were used, but that is far from being sufficient.

¹ <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12973-Statistics-on-pesticides-as-regards-the-list-of-active-substances>

PAN Europe instead calls for the following rewording of article 3 (1) of the pesticide statistics regulation:

Member States shall collect the data necessary for the specification of the characteristics listed in Annex I by means of collecting raw data from farming under the obligations pursuant to Article 67 of Regulation (EC) No 1107/2009. Member States shall also collect and publish from using the same annual use data collection system for all large scale [eg. maize, wheat, barley] and high input [eg. apples, vine, potatoes]) crops. The data shall be collected at farm level and shall be published annually as disaggregated use data per crop/pest combination, per region, per year of active ingredients.

Pesticide sale statistics

European Citizens have a right to be informed about pesticide use. It is not only a minimum request to ask of the farming community who receive 60 billion euros annually within the Common Agricultural Policy, also to align it to the ruling of the Court of Justice of the EU (case C-673/13 P) claiming that emission to the environment information must be disclosed and overrule industry's interests!²

PAN Europe calls on Member States and the European Commission to publish annual sales data by active ingredients for each country and for any active substance without aggregation. **PAN Europe therefore calls for deletion of article 3.4 of the pesticide statistic regulation regarding confidentiality of data to protect commercial interests.**

The list of active substances should be improved

PAN Europe welcomes, that the annex has been updated to include new active substances. Also, we welcome that for each category a catch whole has been established.

Also, PAN Europe welcomes that the legislative proposal includes collection of data on alternatives to pesticides including new categories for microbiological and botanical fungicides for instance (F.6), but call for a clear separation in part F6.18 between chemical and natural active substances. Also, we welcome the new reference to biological insecticides, but call for a splitting of I.99.99 into a better more informative and intuitive fashion. Finally, we call for ZR3.2 not to be sandwiched between Methyl bromide and Organophosphorus nematicides, as well as ZR99.99 to be better ordered giving a separation between biological alternatives and chemicals.

Furthermore, we call on 'salt' being added to the list relating to alternatives to herbicides.

Finally, we recall that EFSA guidance document on emergency authorisations³ mentions that Member States have to report on actual use, and therefore find that it is highly time that these derogations are also being reported to the European Commission, not only in terms of number of authorisations given but also the total quantities used, area treated, and the reason for treating.

Encouraging holistic thinking also when it comes to collecting statistics

PAN Europe call on the European Commission to prepare a report reflecting upon how to link statistics on toxicology (pesticides) and statistics of agronomy (uptake of integrated pest management) this way around giving real attention to the many already known alternatives to pesticides.

Pesticide Action Network Europe (PAN Europe) was founded in 1987 and brings together consumer, public health, environmental organisations, and women's groups from across Europe. PAN Europe is part of the global network PAN International working to minimise the negative effects and replace the use of harmful pesticides with ecologically sound alternatives.

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² <https://www.pan-europe.info/press-releases/2013/10/luxemburg-court-rules-eu-commission-has-make-public-full-composition>

³ https://ec.europa.eu/food/sites/food/files/plant/docs/pesticides_aas_guidance_wd_emergency_authorisations_article53_post-210301.pdf