



Factsheet: Contribution to the EU public consultation on Statistics on Agricultural Input and Output (SAIO)

March 2021

PAN Europe's comments to the legislative proposal aiming at establishing Statistics on Agricultural Input and Output (SAIO)

The European Commission has published a proposal for a regulation (COM(2021) 37 final) regarding European statistic for agricultural products and inputs (SAIO). This proposal aims at replacing inter alia Regulation (EC) No 1185/2009 concerning statistics on pesticides. Below, you can find PAN Europe's comments regarding the public consultation¹:

We welcome the proposal to make Member States accountable in relation to pesticide statistics

PAN Europe welcomes the proposal to clarify to what extend Member States are accountable for providing pesticide statistics to the EU. The legislative proposal clarifies in article 8 point 3 and 4 that:

3. The statistics on plant protection products as referred to in Article 5(1), point (d)(iii) shall be provided using the records kept and made available in accordance with Article 67 of Regulation (EC) No 1107/2009.

4. For that purpose, the Member States shall request from professional users of plant protection products, in electronic format, records covering at least the name of the plant protection product, the dose of application, the main area and the crop where the plant protection product was used in accordance with this Regulation.

This proposal is not new, as Member States first agreed to collect pesticide use statistics back in the 1990s with the establishment of the agri-environmental indicators within the Common Agricultural Policy (CAP). Since 2011, farmers are obliged to keep records of their pesticide use, as mentioned above, while Member States are obliged to identify trend in the use of certain active substance, to identify priority areas, to publish the results according to article 15 of the Directive 2009/128/EC on Sustainable Use of Pesticides (SUD) and to provide use data to Eurostat under article 3 of Regulation (EC) No 1185/2009 on statistics on pesticides.

¹ <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12257-Statistics-on-Agricultural-Input-and-Output>

We oppose that Member States can base statistics on survey and ask derogations in the collection of pesticide statistics

PAN Europe disagrees with the European Commission's proposal for collecting the data. The legislative proposal states : "*Member States which decide to use the sources, methods or innovative approaches*" (art.8.5). Furthermore, article 13 states : "*the Commission may adopt implementing acts granting derogations to Member States for a maximum duration of two years*".

Citizens want the EU to deliver on its promises regarding pesticide use reductions. Therefore, SAIO should oppose surveys and derogations from member states.

Inclusion of EU strategy on zero pollution to measure pesticide leakage

PAN Europe wonders why the European Commission did not make any specific reference to the EU Strategy on zero pollution². The legislative proposal says in recital 2:

The collection of statistical data, in particular on agricultural input and output, should aim, among other things, to inform the decision-making process with updated data to support the European Green Deal with the related 'farm to fork' and 'biodiversity' strategies and future CAP reforms.

However, the Farm to Fork Strategy recognises that "*the EU needs to better monitor, report, prevent and remedy pollution from air, water, soil, and consumer products*". With the zero-pollution strategy currently being prepared, this should have been included into the legislative proposal.

It is worth recalling the verdict from Court case *Lars Neumeister vs. the Government of Germany*, represented by the Bundesamt für Verbraucherschutz und Lebensmittelsicherheit, regarding citizens' right to know about environmental emissions.

To proceed on this, we call on the Council and the European Parliament to build on the European Commission staff working document (SWD (2020) 149 final) on citizen science initiatives across the EU. Also important to establish in parallel a legal base and appropriate funding to continue LUCAS survey (Land Use/Cover Area frame statistical Survey) on land cover and land use, continuing to test for pesticides occurrence in soil.

Full recognition of the European Parliament and civil society in SAIO

PAN Europe disagrees with the decision-making process being proposed by the European Commission. PAN Europe instead call for full co-decision power to other decision making bodies, starting with the European Parliament and civil society organisations.

We welcome having been consulted on this matter, and hope decision making on which statistics should be available at EU level should be opened up even further. It is crucial to break the current structure, which is strongly dominated by Member States leading to the

² https://ec.europa.eu/environment/strategy/zero-pollution-action-plan_en

current really bad EU statistical situation we are now in: for instance, EU decision makers agreed on pesticide use statistics over a decade ago, but it is still not public available.

PAN Europe calls on the legislative proposal be adjusted accordingly.

What kind of pesticide statistics to be collected - a reminder

As mentioned in earlier PAN Europe's positions³ ⁴ on this matter, we call on a comprehensive set of indicators being developed.

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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³ https://www.pan-europe.info/sites/pan-europe.info/files/PAN%20Europe%20position%20on%20agricultural%20statistics_SAIO.pdf

⁴ https://www.pan-europe.info/sites/pan-europe.info/files/20211202_PAN%20Europe%20position%20on%20pesticide%20indicator%20final.pdf