

Brussels, 19 January 2024

To: EU Ministers of Agriculture, Environment and Health

Subject: Sustainable Use of Pesticides Regulation (SUR) - Integrated Pest Management and crop-specific rules

Dear Minister,

In view of the first meeting of the Working Group on the Sustainable Use of Plant Protection Products (SUR) proposal on 24 January, we would like to share our views on the importance of Integrated Pest Management (IPM) and crop-specific rules (CS rules) in the Commission's SUR proposal. IPM and CS rules are key for achieving reductions in pesticide use.

Before elaborating our standpoint on IPM, we would like to point out to the fact that **in December 2022, the Council requested from the Commission to provide a [study](#) complementing the impact assessment of the SUR proposal. However, the results of the study, published on 5th of July 2023, were not taken into consideration by the Spanish Presidency in their Compromise texts.** We urge you to rectify this omission and **use the results of the additional study in your contributions** requested by the General Secretariat of the Council.

The mentioned study, as well as the [scientific community](#), affirm that a well-structured shift towards a lower dependence on pesticides will not result in any negative repercussions regarding food availability. Scientists stress that, on the contrary, failing to address the collapse of biodiversity and ecosystems poses an important threat to ecosystem services, among which food production¹ (Annex 1). Pesticide use is also linked to severe threats to human health (Annex 2). The SUR is, therefore, essential to transition towards healthy, sustainable, nature-friendly food systems. **The effectiveness of the SUR in practice depends on the preservation and strengthening of its core provisions.**

Chapter on Integrated Pest Management and Crop-specific rules

The lack of implementation of IPM since the Sustainable Use of Pesticides Directive (2009) demonstrates that without setting mandatory rules, no pesticide reduction will occur. Therefore, mandatory IPM and CS rules are essential for the SUR to be effective.

IPM offers a viable and effective approach to substitute and significantly reduce pesticides. Numerous IPM, agroecological, and nature-inclusive farming systems across Europe, backed by extensive research and empirical data, demonstrate its tremendous potential to bolster the resilience of agricultural systems and reduce reliance on pesticides. Complementary alternatives, such as biological pest control, can only realise their full potential when applied with IPM practices that promote biodiversity restoration. This integrated approach

¹ [Lemarchand et al.](#) Cancer incidence in the AGRICAN cohort study (2005–2011)

enhances the overall resilience of agricultural systems, which is essential to safeguard crops from pests and provide resilience to unpredictable weather events. By reducing dependence on pesticides and synthetic fertilisers, IPM reinforces farm's financial sustainability.

However, the chapter on **IPM and CS rules** drafted under the Swedish Presidency severely watered down key provisions on IPM. Nullifying directly binding crop-specific rules and making them optional for Member States (MS) would dismantle a crucial component of the Sustainable Use Regulation (SUR) proposal. **Effective and enforceable IPM CS rules covering at least 90% of the utilised agricultural area (UAA) are indispensable for the SUR to effectively transform agricultural practices.** The establishment of a legally binding framework is imperative to equal inclusion of Member States. Mandatory reporting on IPM practices and pesticide use is essential for transparency, data collection, and effective progress monitoring. EU farmers should be evolving in a level playing field, while all Member States need to play a role in fostering a sustainable future for their farmers, by reducing pesticide use and thus protecting the health of farmers, other citizens and the environment.

In addition, **with EU bans of chemical pesticides on the rise**, due to their harmful effects on human health and the environment, it is crucial that **farmers are timely prepared for further withdrawal of active substances, and adequately supported to adapt their practices.** The proposed move to make IPM **optional** instead of mandatory and enforceable, with CS rules, would **hinder the ability of farmers to effectively transition away from harmful chemicals and ensure a sustainable future for agriculture.**

To conclude, **clear and concise definitions of IPM, as well as of practices that do not constitute IPM, are crucial.** The SUR regulation should unequivocally articulate that **IPM is not an optional approach but rather a mandatory, multi-step process that must be followed in order to effectively and sustainably manage pests and diseases.**

In addition, we would like to recall that European citizens are increasingly aware of the dangers of pesticides and are demanding effective measures to reduce their use and the risk they pose to health and the environment. This is reflected in a number of indicators, including two successful European Citizens' Initiatives (ECIs) "[Save Bees and Farmers](#)" and "[STOP Glyphosate](#)", [EU barometers](#), the [Conference on the Future of Europe](#), and the Ipsos survey "[Play it Safe](#)".

We appreciate your time and consideration.

Yours sincerely,

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Annex 1

Europe is grappling with severe [weather](#) phenomena, causing significant [yield losses](#) and prompting government officials to seek financial assistance for affected farmers. The alternating periods of water shortage and severe flooding have far-reaching consequences for agriculture and livelihoods. A wide scientific consensus that [pollinators](#) are essential to food security and are severely affected by pesticide use, calls for urgent action. [Natural pest control](#) contributes to at least 50% of pest control in crop fields, and fully depends on a rich and resilient biodiversity. The growing [pest-resistance to synthetic pesticides](#) can be overcome by implementing methods that are not exclusively based on synthetic pesticides. More than 60% of [EU soils](#) are classified as unhealthy, mainly due to soil pollution and loss of soil biodiversity.

Annex 2

Pesticide use can have serious negative health consequences for humans health^{2,3,4,5,6,7,8,9,10,11,12,13}. Farmers, workers, operators, bystanders and inhabitants of agricultural areas are in particular danger of exposure to pesticides, which has been linked to increased risks of several illnesses, including cancer, neurological disorders, reproductive problems, and developmental and behavioural problems in children.

² [Eriksson et al., 2008](#), Pesticide exposure as risk factor for non-Hodgkin lymphoma including histopathological subgroup analysis

³ [Nordby et al., 2004](#), Incidence of Lip Cancer in the Male Norwegian Agricultural Population

⁴ [Koutros et al., 2013](#), Risk of Total and Aggressive Prostate Cancer and Pesticide Use in the Agricultural Health Study

⁵ [Rani et al., 2021](#), An extensive review on the consequences of chemical pesticides on human health and environment

⁶ [Chilipweli et al., 2021](#), Maternal pesticide exposure and child neurodevelopment among smallholder tomato farmers in the southern corridor of Tanzania

⁷ [Moreira et al., 2021](#), Pesticides and Male Fertility: A Dangerous Crosstalk

⁸ [Mancini et al., 2023](#), Association between Residential Proximity to Viticultural Areas and Childhood Acute Leukemia Risk in Mainland France: GEOCAP Case-Control Study, 2006-2013

⁹ [Clementi et al., 2008](#), Pesticides and fertility: an epidemiological study in Northeast Italy and review of the literature

¹⁰ [Hertoge et al., 2019](#), Pesticide contamination and associated risk factors at public playgrounds near intensively managed apple and wine orchards

¹¹ [How pesticides impact human health and ecosystems in Europe](#), European Environment Agency

¹² [Doğanlar et al.,](#) Nonoccupational Exposure of Agricultural Area Residents to Pesticides: Pesticide Accumulation and Evaluation of Genotoxicity

¹³ [Candel, Jeroen](#): Scientists call for ambitious Sustainable Use of Pesticides Regulation, [Pe'er, Guy](#): Scientists support the EU's Green Deal and reject the unjustified argumentation against the Sustainable Use Regulation and the Nature Restoration Law, [Hallmann et al., 2017](#), More than 75 percent decline over 27 years in total flying insect biomass in protected areas, [Rigal et al., 2023](#), Farmland practices are driving bird population decline across Europe, [Brühi et al., 2021](#), Direct pesticide exposure of insects in nature conservation areas in Germany