



Mr Frans Timmermans
First vice president of the European Commission
Better Regulation, Interinstitutional Relations,
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European Commission
B-1049 Brussels.

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Open letter: integrating the European Citizen Initiative on Glyphosate into the Common Agricultural Policy delivery model

Dear Commissioner Timmermans,

The Pesticide Action Network Europe (PAN Europe) and its members are writing to you regarding how to take into account the requests from European Citizens' Initiative (ECI) on Banning Glyphosate and Protect People and the Environment from Toxic Pesticides and the promises made by the European Commission in response to this initiative, within the ongoing debate and inter-service consultation on the new delivery model of the Common Agricultural Policy.

We recall that regarding request 3 '**setting 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.*'

We welcome the approach taken in the ECI reply, recalling the obligation of Directive 2009/128/EC on the sustainable use of pesticides (SUDP) in ensuring pesticide use reductions. We notice that the official reply says: '*Finally, on the third aim, to "set EU-wide mandatory reduction targets for pesticide use, with a view to achieving a pesticide-free future", the Commission concluded that it intends to focus on the implementation of the [Sustainable Use Directive](#), and will re-evaluate the situation, initially in a report to Council and the Parliament on the implementation of the Directive to be produced in 2019.*'

We urge you not to wait until 2019 to take action but to act now: An ambitious piece of legislation like the SUDP needs big spending programmes like the Common Agricultural Policy (CAP) in order to be successfully implemented. It is therefore crucial to make sure that the SUDP is integrated as broadly as possible into the ongoing CAP reform discussion.

A PAN Europe [reflection paper](#) clearly shows that the current CAP does not deliver on pesticide use reductions. This can be remedied by fully implementing the SUDP into the reformed CAP.

Indeed, the Commission has already undertaken to follow such an approach, as stated in the statement in the [appendix to the CAP reform of 2013](#). We consider that the way forward is that the **CAP strategic plans need to include relevant actions on pesticides**, including:

- **Pesticide dependency reductions** should become one of the performance indicators with ambitious quantitative targets, timetables and measures that each Member State needs to deliver as part of their CAP strategic plans.
- **Crop rotation** should become one of the mandatory requirements, instead of the current crop diversification. Long term crop rotations are an essential alternative to using different categories of pesticides, including [glyphosate](#).
- **A specific measure** targeted to encourage uptake of non-chemical alternatives to pesticides (agronomic, mechanical, physical and other means) as part of an overall integrated pest management (IPM) strategy. IPM has a proven ability to reduce dependency on pesticide use.
- The Farm Advisory Systems (FAS) must become an effective **independent advisory service across Europe**, able to assist farmers in applying the restrictions on neonicotinoids, start using alternatives and ensure the transition to towards genuinely low impact farming systems.

The [leaked version of the CAP](#) clearly shows that the CAP delivery model does nothing to encourage pesticide use reductions (with only one reference remaining that talks about research needs), while none of the around 100 proposed indicators refers to pesticide use reductions¹ but only to a vague objective to reduce risks and impacts. This is in clear contrast to the requests in the European Citizens' Initiative on glyphosate, and we therefore call on you to change it in the ongoing inter-service consultation.

Finally, an analysis of DG SANTE's homepage, attached, gives the impression that the issue of pesticide dependency reductions is still not getting the right attention within the European Commission. The homepage constantly refers to 'reducing the risks and impacts of pesticide use', and nowhere is there a reference to the above-mentioned engagement to *"set EU-wide mandatory reduction targets for pesticide use, with a view to achieving a pesticide-free future"*. This is also an incorrect interpretation of the SUPD which specifically refers to 'reduction in the dependency on pesticide use' no less than seven times in articles 4 and 15 and their recitals.

We urge you not to lose this timely opportunity to ensure the European Commission's promises regarding the ECI on glyphosate are fulfilled, and therefore not to lose the opportunity to convince European citizens that the European Commission is protecting its people and the environment from toxic pesticides. As ever, we are happy to discuss the issues surrounding the ECI, and stand ready to assist in any way we can.

Sincerely yours,

Francois Veillerette
PAN Europe President

¹ Quantitative pesticide use reduction targets could for instance be included into the following proposed indicators mentioned in Objective 5 (*foster sustainable development and efficient management of resources*).

Bees should be included under Objective 6 (*preserve nature and landscapes*); the indicator "enhanced biodiversity protection" and the pollinator indicator should become much more generic with subdivision into clearly measurable units.

Crop rotation should become one of the keys to measuring compliance with Objective 4 (*contribute to climate change mitigation and adaptation*).