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Mrs Stella Kyriakidis, Commissioner for Health and Food Safety  
Mr Virginijus Sinkevičius, Commissioner for Environment, Oceans and Fisheries  
Mr Janusz Wojciechowski, Commissioner for Agriculture

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**Open letter: Pesticide Action Network Europe's reaction to COPA-COGECA attack on the overall pesticide use reduction targets in the biodiversity strategy**

Dear Commissioner Timmermans,

Pesticide Action Network Europe (PAN Europe) would like to reply to what officially seems to be the farmers' opposition to the reduction targets set out in Biodiversity Strategy regarding chemical pesticide use (Pekka Pesonen, Secretary General of COPA-COGECA Secretary General, has published an [opinion piece](#) on 8 May 2020).

This is a matter of grave concern as it goes against not just the urgent needs for more environmental protection but also against the law itself (directive 128/2009 on the sustainable use of pesticides). The farmers' lobby denies the increasing societal concern about pesticides use and the acknowledgement by the European Commission itself that EU actions are needed to reduce their use.

PAN Europe, the International Biocontrol Manufacturer Association (IBMA) and the International Organisation for Biological Control (IOBC) have been in the vanguard of efforts to reduce chemical pesticide use for several decades and have pioneered the uptake of Integrated Pest Management (IPM), particularly since the adoption of directive 128/2009 in 2009.

As a visible sign of this commitment, we have jointly hosted 7 annual symposia since 2012 in the European Parliament and with the support of Members of the European Parliament of several political persuasions. At each of these symposia, committed farmers have given their experience of using IPM across a vast range of production sectors such as greenhouse and protected crops, orchards and vineyards as well as broad scale arable production including cereals, maize and potatoes. Every one of them saw environmental, economic and human health benefits from IPM while laying emphasis on aspects needing improvement.

IPM has never been so urgently needed and the reduction in chemical pesticide use will not happen without its full and dynamic implementation. IPM aims at the prevention of plant diseases and the non-chemical control of weeds. In effect, it can be seen as a hygiene system for plant production where pests are maintained at a low level. Its tools include crop rotations, which allow fields to rest and diseases to weaken or die off, the use of high quality seed and clean machinery to prevent accidental disease spread, monitoring, forecasting and early warning systems. As a second step, disease outbreaks or potential outbreaks are managed using biological control and only after that if not yet successful, the use of synthetic chemical pesticides is considered.

With IPM, we have a system (the only one possible) which can achieve at least the reductions sought by the European Commission at 50% reduction in use and risk. The legislation is in place but we need the will of EU institutions and Member States to achieve it and we certainly do not need approaches such as those promoted by conventional farming organisations which effectively will lead to continued biodiversity loss, to continued water and air pollution, soil degradation and a worsening of farmers' income and standing in society.

Contrary to what COPA-COGECA's Secretary General argues, PAN Europe believes that, if IPM is implemented correctly by farmers by being focused on uptake of good agronomic practices, communicated well to the citizens and integrated into the Common Agricultural Policy (CAP), it could be a concrete tool to make EU citizens better connected to their farmers understanding better what it actually means that farmers need to work with nature, and therefore – like the 10-year biodiversity strategy – be a key tool able to create some stability for farmers in these rather unstable times.

PAN Europe therefore urges the European Commission to resist very strongly to any efforts to weaken its pesticides reduction proposals.

Sincerely yours,

Francois Veillerette  
PAN Europe President

## **ADDRESSING COPA'S EFFORTS TO WEAKEN THE COMMISSION'S 50% PESTICIDES USE AND RISK REDUCTION TARGETS.**

1. The Commission is proposing a 50% reduction in chemical pesticide use but this proposal is not stand alone. It presupposes a different approach to crop production based on existing legislation and specifically on IPM within the sustainable use of pesticides directive. It provides MS with a roadmap for the achievement of its goal through NAPs which certainly need increased ambition in their development and implementation.

2. IPM is a system which puts hygiene and attention to cultural practices with respect to production first, then requires monitoring, forecasting and early warning systems as tools for control, then mechanical, physical and natural controls followed by biological control and finally, and only if necessary, chemical control. IPM is not new but it is dynamic and will always be so.

3. The current system of arable production depends on chemical pesticides as a first rather than a last resort to fight plant diseases. It has led to monoculture, a dramatic collapse of biodiversity, high levels of water pollution, air pollution and serious soil degradation. Continuing on this path will further undermine crop production and also farmers incomes as they become ever more dependent on purchased inputs and fail to build up the lands natural capital which provides benefits and cost savings.

4. IPM can apply across all crop sectors. It has dramatically reduced chemical pesticide use in greenhouse and protected crops. It has rebuilt consumer confidence in crops such as tomatoes and courgettes not just through its hygiene based approach but also in terms of far more efficient water and fertiliser inputs without loss of yield. Ongoing work on vines and orchards with respect to design as well as biological controls both contribute to much lower disease build up and loss of yield. In arable, it's principal tool, rotations doesn't just contribute to biodiversity but to soil and water protection. Rotations are as old as arable farming but are pushed aside by monoculture which is based on chemical pesticides.

5. Farmers have consistently provided evidence of the benefits of IPM on their farms at the annual symposia organised by IBMA, IOBC and PAN at the European Parliament since 2012. They have shown that they can maintain yields, reduce chemical pesticide inputs by over 50% and have more profitable farms where nature replaces purchased inputs and where disease issues are largely addressed before they develop into major problems.

6. On IPM itself, we believe that farm organisations should actually join IBMA, IOBC and PAN to push forward on certain issues such as:

➡ An ambitious vision so IPM becomes the norm with its success measured not least in substantially reduced chemical pesticide with a bonus for farmers, consumers and environmentalists with lower pesticide residues, improved quality biodiversity, water and soil and a greatly improved image for European farming.

➡ The urgent need to fully address the authorisation issue for biological and low risk control. The SME driving this should not be penalised when it is their innovation which will bring the benefits of reducing much chemical pesticide use.

➡ The building blocks to help IPM need to be more fully emplaced and embedded into the CAP and this includes insurance where appropriate. But it also means that research, education, training, monitoring, early warning systems and independent advice are the norm rather than the exception.

➡ Finally, IPM needs to be seen as a business opportunity by large chemical pesticide companies. They need to forward plan with IPM in mind.

7. IPM is for crop production the equivalent of the high degree of hygiene practices favoured in public health today in the battle against COVID 19. It brings enormous benefits and will be among the key means through which the 50% reduction in chemical pesticide use in Europe can be achieved. We look to farm organisations to work with us to achieve this vital objective.