



**Pesticide
Action
Network**
Europe

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Open letter: Presentation of production and yield forecasts in the civil dialogue, management and market observatory on arable crops on organic and on pesticide use

Dear Mr Plewa,

The paradigm shift announced in the headlines of the recent CAP reform proposals “from compliance to performance” is welcome but needs to be accompanied by real monitoring of actual facts. This is why, in the name of Pesticide Action Network Europe (PAN Europe), I am asking you for increased collaboration between different stakeholders, EU Institutions and Member States to give the deserved attention to statistics on organic farming and on pesticide use.

In each of the Civil Dialogue Group meetings with stakeholders (at least for [arable crops](#)), in the Management Committee on the Market Organisation with Member States (again at least for [Sugar-Cereals-Fibres](#)), and in the EU market observatory production forecasts (again at least on [Crops](#)) production forecasts are being presented and discussed relating to yield, area, production, prices and overall market situation. We notice that market outlook for main crops is even presented and discussed within the Agricultural Council¹.

However, these production estimates and forecasts presented and discussed does neither distinguish between organic and conventional production systems, nor does these inform about the pesticides used in producing these crops. We wonder how DG AGRI can understand the

¹ Minutes of Agricultural Council of 18 June 2018

market without having knowledge neither about the most dynamic parts (organic) nor about the inputs used?

1) The need to start distinguish between organic and conventional in the forecasts discussions

On the homepage on DG AGRI it says: *The EU organic sector is developing rapidly. On average over the past decade, the area of organic farmland in the EU increased by half a million hectares - every year. There are now over 186 000 farms cultivating organic farmland across the EU.*

Furthermore, in DG AGRI's presentation presented in the civil dialogue on sugar the 16 March 2018, it was mentioned that the more that 6% of all Utilised Agricultural Area is now organically grown.

It is therefore difficult to understand why the European Commission keeps on insisting in presenting area, production and yield forecasts as well as market situation as one system².

PAN Europe has since 2016 been raising this issue in a number of civil society groups. From annex 1 you can read that our request has been recorded in no less than seven CDGs relating to arable crops only.

In the CDG "Arable Crops – Sugar" of 16 March 2018 the sugarbeet growers - CIBE made a very interesting presentation of the organic sugar production across Europe. Again, PAN Europe asked the floor asking about the importance of 'systematic distinction be to made between organic and non-organic regarding: yields, area, production, etc.' The European Commission replied only relating to sugar, recorded in the minutes by '*there are not enough statistics on organic sugar production. Unit G.4 (arable crops) collects information on sugar production as a whole, and does not differentiate between organic sugar beet and conventional sugar beet production. Nevertheless, the new organic import certificate means that more reliable figures on organic sugar imports may soon be available.*

Since our above-mentioned, numerous calls for action have not being heard at working level. We call on you to make sure that future discussions on crop forecasts, yield estimates and market potentials discussed in the Civil Dialogue groups, in the Management committees and in the Market observatories and anywhere else distinguish between conventional and organic agriculture.

2) Collection on pesticide use statistics in arable crops

There are several EU laws calling on pesticide statistics to be developed:

The EU regulation on authorization of Plant Protection Products (Regulation (EC) No 1107/2009) specifying in article 67 (1) that: *Producers, suppliers, distributors, importers, and exporters of plant protection products shall keep records of the plant protection products they produce, import, export, store or place on the market for at least 5 years. Professional users of plant protection products shall, for at least 3 years, keep records of the plant protection products they use, containing the name of the plant protection product, the time and the dose of application, the area and the crop where the plant protection product was used. They shall make the relevant information contained in these records available to the competent authority*

² In the 2017 Agricultural Outlook conference almost all market sections mentioned that consumers' demands towards environmentally sustainable practices (e.g. organic) should be taken into account especially when looking at a 2030 horizon: if organic milk, today 4% of total production, will represent 10% in 2030, then this will have an impact on the average yield and in the number of cows needed to produce the same quantity of milk, which in turn has an impact on GHG emissions.

on request. Third parties such as the drinking water industry, retailers or residents, may request access to this information by addressing the competent authority. The competent authorities shall provide access to such information in accordance with applicable national or Community law.

The EU Directive on sustainable use of pesticides ([Directive 2009/128/EC](#)) specifies in article 15 that harmonized risk indicators need to be developed. In December 2017, as a response to the European Citizens Initiative ‘ban glyphosate and protect people and the environment from toxic pesticides’ the European Commission’s PR specifies (as part of request 3): *in order to monitor trends in risk reduction from pesticide use at EU level, the Commission will establish **harmonised risk indicators** on top of the existing national risk indicators.*

Finally, the EU Regulation concerning statistics on pesticides (Regulation (EC) No 1185/2009) establishing a common framework for the systematic production of Community statistics is meant to publish annual statistics of pesticide sales since 2011 and statistic on pesticides use every five years, and the first report meant for publication in 2016. While the implementation report ([COM/2017/0109 final](#)) explains that: *Pesticides are a cause of pollution and have a direct effect especially on the state of biodiversity, water bodies, and soils. To ensure that these impacts are addressed appropriately, it is essential that policymakers are able to quantify the risk and the level of pesticide pollution. This would also aid the better implementation of existing environmental policy tools and serve to identify the remaining policy gaps for addressing the environmental pressures caused by pesticides. Currently, the policies concerned by the data needs are the EU Biodiversity Strategy 2020, the common agricultural policy (CAP), the Water Framework Directive, and the Thematic Strategy on Soils.*

However, to date pesticide use statistics has to date not been published by Eurostat. The above-mentioned implementation report says: *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. This could include specified common reference periods and clear coverage requirements for the crops to be surveyed. The coverage rules could be based on the crop production statistics (a certain percentage of arable and permanent crops could be covered) and on analyses of the potential risks to the environment and human health, based on the sales of active substances. These rules would be set up in close collaboration between the relevant Commission's services and agencies and with national experts. ..and..The Commission strongly recommends that pesticide statistics should be also merged with the other agricultural statistics domains.*

So, to ensure that the European Commission starts delivering on its own laws, including the development of harmonized risk indicators the five-year publications of statistics on pesticide use across the EU and integrated into the agricultural statistics domains (agri-environmental indicator), PAN Europe calls on DG AGRI – as already called for in several CDGs - to start collecting information on pesticide use from Member States looking for ways to integrate this into the Management Committees, Civil Dialogue Groups and Market Observatories.

Sincerely yours,

Francois Veillerette, PAN Europe President

Annex 1

Overview of civil dialogue groups on arable crops where minutes refer to PAN Europe's request to distinguish between organic and conventional production systems.

- civil dialogue of the “CDG ARABLE CROPS” – “ TOBACCO AND COTTON” – 13th May 2016 ‘*PAN EUROPE asked if there were any figures about organic tobacco*’ and as you will be able to see from the [minutes](#) a real interesting debate flourished with each of the national stakeholders telling about market opportunities of organic tobacco (Japan and the US, and to a less extent ‘made in Italy’) and how many hectares of organic tobacco is being produced in each of the Member States.
- CDG Arable Crops - COP (Cereals, Oil Crops & Protein) & Non Food Crops – 9/9/16 recorded in the [minutes](#): ‘*PAN Europe - Can we differentiate organic and conventional production?*’ This message was heard and understood: ‘COPA - Indeed organic production information is important and needs to be looked into it.’
- CDG COP & Seeds 7 March 2017, recorded in the [minutes](#) by: *Pan-Europe asked the organic market to be presented separately*’.
- CDG on Cereals, Oilseeds and Protein Crops – 4th July 2017, recording in the [minutes](#) by: ‘*PAN Europe asked if there are differences between organic production and conventional production, and whether pesticide use can be presented as well in the future.*’
- CDG on arable crops 12 October 2017 recorded in the [minutes](#) by: ‘*PAN Europe reminded to look into the use of pesticides.*’ And ‘*PAN Europe asked the Commission to add more information on organic farming as well as more information as to where the protein crops are produced in Europe, EFA percentage, etc.*’
- CDG on arable crops sugar and rice of 13th of December 2017, recorded in the [minutes](#) by: *PAN requested information on organic sugar cultivation in the EU. CIBE confirmed that it collects such figures. And in the Conclusions/recommendations/opinions it says: ‘Organic sugar should be added to the agenda of the next meeting of the Civil Dialogue Group on sugar, covering: areas, rules, import conditions.’*
- CDG "Arable Crops – Sugar" of 16 March 2018, PAN Europe asked the floor and again asked about the importance of ‘systematic distinction be to made between organic and non-organic regarding: yields, area, production, etc.’ This is wrongly reported in the draft minutes as having been IFOAM making this remark, and only relating to sugar despite the fact that reality we have been asking for this to distinction to be done for all crops!