



Brussels, 21 January 2019

Regarding: Vote on the establishment of Harmonised Risk Indicators for pesticides

Dear Member State,

At the forthcoming meeting of the Standing Committee on Plants, Animals, Food and Feed (SCoPAFF) being held 24th – 25th January 2019, the adoption by the EU of a set of harmonised risk indicators for pesticide use will be discussed under agenda item B.01 - *'Exchange of views and possible opinion of the Committee on a draft Commission Directive amending Directive 2009/128/EC of the European Parliament and of the Council as regards the establishment of harmonised risk indicators (SANTE/10821/2018)'*.

Pesticide Action Network Europe (PAN Europe), PAN Germany and PAN UK have developed a joint position paper, [here](#), proposing how the harmonised risk indicator (HRI) needs to be improved, but we call on you to vote in favour of the proposal being put forward by the European Commission if it comes to a vote during the aforementioned SCoPAFF meeting.

The EU Directive on Sustainable Use of Pesticides (SUD) was adopted in 2009. We are now in 2019, so a decade away from the SUD's approval. Despite the good intentions put forward in the SUD there is no easily accessible, harmonised system for reporting pesticide use throughout EU Member States, making it impossible for civil society and others to monitor or comment clearly on how pesticides are used in the EU or how their use is changing over time.

One of the key goals of the SUD was to reduce the use of and impacts from the use of pesticides across the EU. Without a set of harmonised risk and use indicators it is impossible to ascertain if use and / or risk is declining, remaining the same or rising. In terms of transparency, accountability and the ability to monitor the impact of regulation on reducing use and / or risk from pesticides it is essential that an effective set of HRIs be adopted.

We recall the [Report](#) from The Commission to The European Parliament and The Council on the implementation of Regulation (EC) No 1185/2009 estimating the cost and burden to both member states and farmers in the delivery of pesticide sale and use statistics to be relatively limited.

It seems clear that adopting the HRIs as proposed by the Commission is a first step in delivering transparency and better reporting of pesticide use whilst incurring no unwarranted burden in terms of cost or time for farmers and other users of pesticides. Therefore, we ask you to support the measures and to vote in favour should the matter be voted on at the SCoPAFF meeting.

Kind regards,

Francois Veillerette, PAN Europe President (On behalf of PAN Europe, PAN Germany and PAN UK)