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Minister Rolnictwa i Rozwoju Wsi

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Open Letter: Implementation of Sustainable Use of Pesticides Directive and Revision of National Action Plans

Szanowny Panie Ministrze

Pesticide Action Network (PAN) Europe and Polski Klub Ekologiczny are following closely the implementation of the Directive 2009/128/EU on Sustainable Use of Pesticides (SUD); we are therefore pleased that DG SANTE has published its evaluation report. We are also pleased to notice that you, as part of the roundtable held in the EU Council on agriculture (on 6 November 2017), confirmed engagement towards ensuring serious implementation in the future.

We remind you that this evaluation report was due on 26 November 2014 (SUD Art. 4.3) and that it is now time to take serious action to recover the time lost in the SUD implementation.

PAN Europe's Evaluation of the National Action Plans (NAPs) from 2013 clearly shows that, while the majority of Member States are using the National Action Plans (NAPs) to gather information on pesticide use in their country, not much progress was originally made.

After the publication of DG SANTE's evaluation report we prepared PAN Europe's evaluation report, in which we look at the uptake of actions since the NAPs were prepared in 2011-2012. Our analysis shows that progress has been made in the field of checks on spraying equipment, and in the development of training courses and certification schemes regarding how best to spray pesticides. Instead, very little progress has been made in promoting the uptake of alternative techniques, which are the key to ensuring serious pesticide dependency reductions. We therefore conclude that the main achievements since the SUD was adopted are decisions in Netherlands, France, Luxembourg and Belgium to stop using pesticides in public areas as of 2017-18.

We welcome the recommendation in the Commission's evaluation report calling for *'Member States (...) to improve the quality of their plans, primarily by establishing specific and measurable targets and indicators for a long-term strategy'*. We also note with interest that the report says: *'Integrated Pest Management is a cornerstone of the Directive, and it is therefore of particular concern that Member States have not yet set clear targets and ensured their implementation, including for the more widespread use of land management techniques such as crop rotation'*.

We call on each Member State to revising their NAP as follows:

- ✓ **Serious targets and timetables:** the new NAP must set quantitative reduction targets of 50% to be obtained in 10 years, following the model from France, and if needed accompanying this with the establishment of a pesticide tax (as has been done with great success in Denmark).
- ✓ **Serious measures to protect the aquatic environment and drinking water, with mandatory establishment of buffer zones.** 42% of the EU's freshwater ecosystems suffer from chronic toxicity. Pesticides banned decades ago, such as atrazine, a reprotoxic and endocrine disrupting herbicide, keep reappearing.
- ✓ **The revised NAP to develop a strategic pollinator plan - protecting bees and pollinators:** While not explicitly mentioned in the SUD, it has now become increasingly recognized that pesticides, mainly insecticides but also fungicides, have a broad range of lethal and sublethal effects on pollinators under controlled experimental conditions as well as at field level.

The EU has recently kicked off an EU pollinator strategy. It is more than time to become coherent and stop providing article 53 derogations for emergency authorisations and promote nature-based solutions instead, starting with the establishment of flowering buffer strips in the field attracting not only pollinators but also natural predators to manage pests; we invite you to watch some of the films that we have produced with farmers' testimonies as to how this can be done.

- ✓ **The revised NAP to develop a strategic plan on soil protection:** the Estonian presidency has put the debate on soil back on the EU agenda. As recent studies show that 45% of Europe's top soil contains glyphosate residues. We call on Member States to include soil health into the debate about the revised NAP.

We invite national ministries and especially national farm advisory systems to watch and organize local events around the 6th symposium in Brussels on 31 January 2018, that PAN Europe will be organising in collaboration with International Organisation of Biological Control (IOBC) and International Biocontrol Manufacturer Association (IBMA) on the implementation of the SUD (this year's specific topic being the uptake of Integrated Pest Management working with nature in cereal production).

- ✓ **Develop good EU pesticide dependency indicators:** since 2011, Eurostat has been publishing data annually on EU sale of pesticides.

In order to ensure monitoring on quantifiable pesticide use dependency, we must build on article 67 of EU Regulation 1107/2009 on the marketing and sale of plant protection products in which farmers are required to keep report of products used. We call on member states to make sure these statistics are being collected at farm level and forwarded to Eurostat allowing them to ensure publication of sector-specific pesticide use data.

We call for a revision of EU Regulation (EC) No 1185/2009 concerning statistics on pesticides to make sure that more information on specific substances is released in the EU, fulfilling obligation with regards to citizens' right to know.

- ✓ **Stakeholder participation in the revision of the NAP:** we finally call on Member States to make sure that the revised National Action Plan will be prepared soon, that environmental and

women's groups are involved in the preparation of the revised NAP and that new plans are published in early 2018.

PAN Europe and its members are aware that it is not always easy being a farmers caught in quality requirements asked by supermarkets, by bank debt etc, however, when moving down that road farmers get stuck in thinking short term, what an EU policy need to do in our opinion is helping to think longer term again, and as part of that recall that farming should be working with nature, and that a different management could actually over time help not only the farmers reduce pesticide use, but also help to ensure that the farming systems get more resilient to external pressure.

However, in the entire debate on pesticide use and economics, we recall that the importance of moving away from a debate based on yields and short-term income and towards a system based more on income, both in the shorter and longer run¹. Also important to recall the many nature based solutions already being applied in some places of Europe allowing both biodiversity and farmers profitability to increase at the same time.

We call on Member States to think this all into the reflections of the reform of the Common Agricultural Policy reform discussions. Today some of the Member States having the highest per hectare payments are according to PAN Europe calculations also the one using most pesticides per hectares, and the current CAP is not delivering on pesticide use reductions.

The CAP Communication is focused on result based approaches: PAN Europe calls for that pesticide dependency reductions becomes one of the result indicators, and that the SUD and the CAP debate is becoming much more interactive. Some thoughts on how to do this see PAN Europe evaluation report

Thank you in advance for your consideration of these points.

Yours sincerely,

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¹ Jacquet F. *et al.* 2011: pesticide use can be reduced by 30% without consequences for yields and margins; and Lechenet et al 2017: pesticide use can be reduced by 42% in 59% of the (946) farms studied without consequences on yield).