

18th of October 2023

Subject: Reaction to the Presidency Steering Note - Joint comments from BG, CZ, EE, HU, IT, LV, LT, MT, PL, RO and SK published on 13 October - Sustainable Use of Plant Protection Products (SUR) proposal

In a recent communication sent to the delegations of the Council of the EU, ahead of the Working Party on Plants and Plant Health Questions (Pesticides/Plant Protection Products) on 16th of October 2023, the Spanish Presidency shared a Steering Note and Joint comments from BG, CZ, EE, HU, IT, LV, LT, MT, PL, RO and SK. These 11 Member States deviate far from the Commission's proposal for the Sustainable Use of Plant Protection Products, suggesting severe watering down the vital parts of the proposal related to national reduction targets and Integrated Pest Management (IPM).

The note aims for the **deletion of binding national pesticide reduction targets and proposed the implementation of IPM "when appropriate"**. **The outcome of such provisions would be detrimental to the European Green Deal goal of a 50% reduction in pesticide use and risk.** Experience teaches that, without result-based approach and clear obligations and rules for Member States, no progress in pesticide reduction will take place: since IPM became mandatory for all Member States in 2014 through the Sustainable Use of Pesticides Directive (SUD), no national enforcement of IPM took place. These 11 Member States thus propose that the SUR becomes even weaker than the SUD. This is in total contradiction with the result of the successful European Citizens Initiative (ECI) '*Save Bees and Farmers*'¹, the 6th successful ECI from the EU since 2012, and already the second anti-pesticides ECI, that asked for a phase-out of synthetic pesticides by 2035.

In their statement, Member States **ask also for the possibility to revise the National Action Plans in case of special circumstances**, so-called "unpredictable reasons", which cover a wide range of events that would cover for the lack of Member States' ambitions. For example, the document suggests even allowing the possibility to increase the use of more hazardous plant protection products, due to the lack of alternatives, while the best and most pressing alternative is the **implementation of IPM**. An EU-funded research project² shows that IPM is a cost-effective alternative to pesticides. Such a request for additional 'derogations' is not supported by science nor by facts. A true IPM starts with agronomic measures, including crop rotation, undersowing, intercropping, etc., to continue with mechanical and physical control, forecasting and monitoring, after which biocontrol can be used when needed. Only after these measures do not prevent the damage of a crop beyond economic thresholds, the use of chemical pesticides should be allowed.

The 11 Member States suggested a list of reasons to allow them not to accomplish reduction goals, which includes effects arising from climate change, such as the occurrence of new pests

¹ www.savebeesandfarmers.eu

² <https://ipmworks.net/>



**Pesticide
Action
Network**
Europe

and crop structure. These arguments are the ones the pesticide industry are putting forward over the last years and are not underpinned by science, once more. **Putting IPM upfront, rather than using more pesticides, is needed to increase the resilience of agricultural systems against pests and extreme weather events such as droughts and floods.** Also, changes in pest resistance status are put forward as exceptions which would warrant deviation from the obligations, while, on the contrary, ambitious **pesticide reductions are needed to tackle the increasingly important challenge of pests resistance to pesticides. Pests have no resistance mechanisms against agroecological alternatives.** Member States further suggest alignment with the import requirements from the third countries, once more meaning, an increase in the use of synthetic pesticides is to be expected.

The document seems to aim at establishing a network of loopholes for not having to meet obligations, supposedly to support farmers and preserve food security, while **its suggestions would lead to the exact opposite, and would keep farmers strongly dependent on agroindustry and jeopardize biodiversity and food security.**

Citizens strongly disagree with the suggested weakening of the proposal's ambition. The need to significantly reduce pesticide use has been stressed by the [scientific community](#), as a wealth of scientific evidence, including numerous field studies, has proven that IPM is an effective tool to strongly reduce pesticide use, and protect farmers' health, health of their families, as well as citizens and the environment. A **recent [IPSOS citizens poll](#)** showed again a high level of concern about risks of pesticides to food, health and the environment, and a preference for a precautionary approach to the regulation and use of pesticides. **The poll result expressed that a large majority of respondents are in favour of mandatory IPM (73,2%).** Moreover, **59% of respondents think that farmers should always use the least harmful methods, or otherwise lose access to EU financial support.** In addition, more than 80% of respondents believe that farming and food production methods pose a threat to the environment. The implementation of IPM is a prerequisite to stop the galloping loss of ecosystem services, on which food production fully relies.

We call upon policy makers to effectively represent the public interest, and to maintain and strengthen the core provisions of the SUR.