

Brussels, 12th of June 2023

Subject: Reaction to the IPM compromise chapter of the Swedish Council presidency on the Sustainable Use of Pesticides Regulation (SUR)

Dear Ministers,

We write to you to express our grave concerns regarding the leaked IPM compromise chapter of the Swedish Council presidency on the Sustainable use of Pesticides Regulation (SUR).

By annulling mandatory rules for Integrated Pest Management (IPM), the presidency **abolishes the heart of the SUR proposal from the European Commission. Indeed, effective and enforceable IPM crop-specific rules for at least 90% of the utilised agricultural area are the absolute essence of the SUR**, and a prerequisite for the SUR to lead to effective changes.

The Swedish Prime Minister Ulf Kristersson stated at the start of the Swedish Presidency that “*A greener, more secure and freer Europe is the foundation of our priorities*”, with green transition one of the stated priorities of the Swedish Presidency. With great indignation, however, **we find the Swedish Presidency is facilitating business as usual, neglecting science and showing a severe lack of responsibility**, instead of ambitiously working towards the urgently needed changes in the way food is produced, in the interest of all European citizens.

Removing mandatory IPM and enforceable crop-specific rules equals no pesticide reductions, and no transition to sustainable healthy agricultural systems. Farmers will remain dependent on the agrochemicals industry, and our cropping systems will remain highly vulnerable to pest outbreaks and extreme weather events. The lack of implementation of IPM since the Sustainable Use of Pesticides Directive (2009) demonstrates that without setting mandatory rules, no pesticide reduction will occur. **The weaknesses in the Directive and the lack of ambition in the National Action Plans (NAPs) were underlined in multiple analyses by EU bodies¹.** All reports point at the lack of mandatory IPM and pesticide reduction objectives, as the main reason for the failure of this Directive.

The aim of the Commission's SUR proposal was to tackle the severe lack of implementation of IPM, given the urgency to address health impacts related to pesticide use, the need to transition to resilient food-production systems and to restore the ecosystem services they depend on. Science shows a transition towards sustainable, nature-friendly food systems and the restoration of ecosystems is **a prerequisite for long-term food security**. In December 2022, over 700 scientists signed **a letter expressing their concern regarding efforts from certain lobby groups to delay and water-down the SUR**. As they state in their letter, the “lack of binding targets is **exactly the reason why investments in Integrated Pest Management have lagged behind since the adoption of the 2009 Pesticides Directive**”.

The consequences and costs of failing to tackle health impacts, environmental degradation and the decline of among more pollinators and other insects, far outweigh

any predicted costs related to pesticide reduction and nature restoration. A recent study by the German government's Environment Agency found that th0 billion euros – far outstripping the potential economic costs of implementing the needed legislation to protect and restore biodiversity. Another study estimated that the societal costs of pesticide use in France represent more than 10% of the 2017 annual budget of the French Ministry of Agriculture and Food.

Implementing a system to help farmers reduce pesticide use and risk, through the implementation of IPM, technical support from Member States, is needed to ensure that this transition becomes a reality. Creating a legally binding framework is necessary to create a level playing field and make sure that all Member States play their part in ensuring a sustainable future for their farmers, while reducing synthetic pesticide use and protecting farmers' and other citizens' health, as well as the environment.

Finally, more and more chemical pesticides are banned because of their excessive toxicity to health and the environment. **By proposing to not make IPM mandatory with crop-specific rules, the Swedish presidency prevents farmers from gradually adapting to the decrease of chemical pesticides.**

We ask you to take responsibility and engage in evidence-based decision-making, in the interest of current and future generations.





Yours sincerely,

¹ References:

Implementation assessment on SUD by the European Parliamentary Research Service (2018)

Report on the SUD of the European Commission (2020)

Report on the SUD of the European Court of Auditors (2020)



	Name of the organisation	Country/ Europe/ International	Email contact	Logo
1	Pesticide Action Network Europe	Europe	Kristine@pan-europe.info	
2	ISDE, International Society of Doctors for Environment	Italy	francesco.romizi@isde.it	
3	Natagora	Belgium	gaetan.seny@natagora.be	
4	Friends of the Earth Europe	Europe	clara.bourgin@foeeurope.org	
5	Lipu BirdLife Italia	Italy	federica.luoni@lipu.it	

	Name of the organisation	Country/ Europe/ International	Email contact	Logo
6	Natuurpunt	Belgium	Stijn.Leestmans@natuurpunt.be	
7	Federazione Nazionale Pro Natura	Italy	info@pro-natura.it	
8	Ecologistas en Acción	Spain	toxicos@ecologistasenaccion.org quimicos@ecologistasenaccion.org	
9	Vogelbescherming Nederland	The Netherlands	bernd.debruijn@vogelbescherming.nl	
10	Latvijas Ornitoloģijas biedrība	Latvia	viesturs@lob.lv	

	Name of the organisation	Country/ Europe/ International	Email contact	Logo
11	BeeLife	Europe	simon@bee-life.eu	
12	Corporate Europe Observatory	Europe	nina@corporateeurope.org	
13	BirdLife Europe and Central Asia	Europe	marilda.dhaskali@birdlife.org	
14	SEO/BirdLife	Spain	agricultura@seo.org	

	Name of the organisation	Country/ Europe/ International	Email contact	Logo
15	Mensa Cívica	Spain	paola.hernandez@mensacivica.com	
16	Justice Pesticides	France	contact@justicepesticides.org	
17	Bond Beter Leefmilieu	Belgium	heleen.desmet@bblv.be	
18	Coalición Por Otra PAC	Spain	contacto@porotrapac.org	
19	Legambiente	Italy	a.gentili@festambiente.it	

	Name of the organisation	Country/ Europe/ International	Email contact	Logo
20	WWOOF GREECE	Greece	info@wwoof.gr	
21	Bündnis für eine enkeltaugliche Landwirtschaft e.V.	Germany	alisa.hufsky@enkeltauglich.bio	
22	Estonian Green Movement	Estonia	marilin@roheline.ee	
23	Pestizid Aktions-Netzwerk e.v. (PAN Germany)	Germany	susanne.smolka@pan-gemany.org	
24	Foundation for Environment and agriculture	Bulgaria	agroecobg@gmail.com ealbenas@gmail.com	
25	GLOBAL 2000 - Friends of the Earth Austria	Austria	helmut.burtscher@global2000.at	
26	Bee Foundation	The Netherlands	info@bee-foundation.nl	

	Name of the organisation	Country/ Europe/ International	Email contact	Logo
27	Ekō	Global	eoin@eko.org	
28	AWHHE NGO	Armenia	officeawhhe@gmail.com	
29	Pesticide Action Network Netherlands	Netherlands	pan.netherlands@gmail.com	
30	Polish Ecological Club	Poland	biuro@pkegliwice.pl	

31	ADENY	France	adeny89@orange.fr	 The logo for 'adeny' features the word 'adeny' in a lowercase, serif font. Above the letters 'a', 'd', and 'e' are several short, vertical lines of varying lengths, resembling a sunburst or a stylized crown. Below the letters 'n', 'y', and the final 'y' are several small, upward-pointing, curved lines, resembling a stylized beard or a decorative base.
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