

*Public funds need to be used to support farmers in taking the measures needed to effectively reduce pesticides, protect health and restore the environment and biodiversity.
Don't delete article 43 in the SUR!*

5th of October 2023

Dear members of the Agriculture Committee of the European Parliament,

We have been closely following the policy process on the proposal of the Sustainable Use of Pesticides Regulation (SUR), which is of large public interest. Securing robust and coherent provisions in the SUR is urgent and essential to protecting farmers', farmworkers' and citizens' health, tackle the biodiversity crisis, the collapse of ecosystems, and support the much-needed transformation towards resilient food systems. **So we are concerned about attempts to delete or weaken article 43 of the SUR proposal of the European Commission.** This article includes amending Regulation (EU) 2021/2115 *establishing rules on support for strategic plans to be drawn up by Member States under the common agricultural policy (CAP Strategic Plans) and financed by the European Agricultural Guarantee Fund (EAGF) and by the European Agricultural Fund for Rural Development (EAFRD)* in order that, during a 5-year transition period, support may be granted to comply with SUR requirements imposed on farmers.

CAP funds, amounting to about $\frac{1}{3}$ of the EU budget, should be, in a result-driven way, used to support farmers in meeting societal needs and demands, including reducing pesticides and restoring biodiversity. **It is incorrect to argue that budgets of the CAP have already been allocated for the coming years, and that no funding is available for requirements of the SUR during a transition period. Strategic plans can be adapted as many times as is necessary in order to adapt to changing needs.** It is therefore incorrect to say that, since the European Commission has already approved all National Strategic Plans, including the design of interventions and the budget allocated for the period 2023-2027, amending Strategic Plans to fund the SUR measures proposed would imply reducing the budget of interventions already programmed.

- **Deleting Article 43 would create unnecessary legal uncertainty for farmers and member states regarding the legality of existing support schemes under the current strategic plans. As funds additional to the basic payments cannot fund measures which make up the legal baseline, farmers would not be able to receive support for taking pesticides reduction measures, or for compensating their costs incurred and income forgone as a result of pesticide reduction measures.**
- **Budget has been foreseen in the CAP funds**, as well as provisions in the CAP Regulation (EU) 2021/2115 (impact indicator 18, result indicator 24, context indicator 49), **to support farmers to reduce pesticide use.** For example, funding is foreseen through eco-schemes under pillar 1, agri-environment climate measures under pillar 2, coverage for insurance or mutual funds for covering losses when applying IPM (EU funds or mutual funds), investment grants for equipment and training (pillar 2) and technical assistance (pillar 2). Since 2015, the CAP also makes it mandatory for Member States to have Farm Advisory Services, which, since 2015, need to be able to advise farmers about IPM. An essential and urgent future step is to ensure independence of advisory services.

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- In July 2022, Birdlife Europe and the European Environmental Bureau (EEB) assessed in a [policy briefing](#) that the **current CAP strategic plans fail to sufficiently pursue pesticide use reduction on European farms**. Their findings show that the existing conditionality requirements have been implemented too weakly by Member States, while the plans did not take up serious reduction targets and timetables. Also the eco-schemes that were taken up in CAP Strategic plans in general do not allow for a genuine shift to agro-ecological practices, while schemes related to national/regional IPM rules have not given a guarantee they will result in pesticides reduction, due to a lack of a clear legally binding framework of crop-specific rules. In that regard, it is essential that the national strategic plans are updated to effectively contribute to pesticide reductions.
- **Member states can update their national strategic plans every year, and hence make changes in their set of measures and the allocation of funds**. When CAP funds are not spent, funds flow back, leading to missed opportunities to support farmers to reduce pesticide use and effectively contributing to a better protection of farmers, citizens and natural resources.

Given the above, it is essential that article 43 remains in the SUR regulation, in order to, financially support farmers in applying measures that effectively reduce pesticides, protect health, and protect and restore the environment and biodiversity.

IPM has been a legal requirement for farmers since 2014 (article 14 of Directive 2009/128/EC), and hence, ought to already have been included in the conditionality of the CAP for many years. Its absence has meant little progress in implementing IPM over the last decade. It is essential that the SUR and the CAP funds are effectively used to support, long-overdue, pesticide reduction objectives. After this transition period, **SUR obligations need to be reinforced in the specific objectives of the post-2027 CAP and in the conditionality of the CAP Strategic Plans regulation post-2027** (Regulation (EU) 2021/2115). Specifically IPM, crop-specific rules and reduction targets should be part of the conditionality in the post 2027 CAP, and result indicator 24 needs to explicitly reflect the area on which farmers have committed to a specific pesticide reduction.

Already **2 successful European Citizens Initiatives¹** have asked to **strongly reduce the use of pesticides in the EU, and for public support to farmers in order for them to do so**. These public demands have been confirmed by numerous Eurobarometers, the Conference for the Future of Europe, as well as by a very **recent IPSOS poll²**. Citizens expect that public money is used to support steps towards a more sustainable agriculture, which protects and restores ecosystem functioning. We hope you will support maintaining article 43 in the SUR.

Thank you for your consideration, Yours sincerely,

¹Stop Glyphosate ECI (2017) and Save Bees And Farmers ECI (2022)

²Report: Opinion poll shows Europeans are opposed to gambling with pesticides and want policy-makers to play safe - <https://www.pan-europe.info/press-releases/2023/10/report-opinion-poll-shows-europeans-are-opposed-gambling-pesticides-and-want>

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Signatories

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