



**Pesticide  
Action  
Network**  
Europe

January 2025

## **Implementation of the outcome of the Strategic Dialogue on Agriculture requires ambitious policy action to reduce pesticides Recommendations for the EU Vision for Agriculture and Food**

**The EU Vision for Agriculture and Food should prioritise policy action to ambitiously reduce pesticides.** Reducing pesticide use and risk is a key objective of the Green Deal. **Reducing pesticide use and risk is essential to apply and implement the political principles and recommendations of the outcome of the Strategic Dialogue on EU Agriculture (SDA).** The SDA report explicitly underlines the need to reduce pesticides.

The Vision for Agriculture and Food should translate the SDA recommendations into ambitious, concrete and result-based policy action. Pesticides are one of the most important causes of the collapse of biodiversity and the pollution crisis, undermining ecosystem services and harming human health<sup>1</sup>. **Ambitiously reducing pesticide dependency is an urgent necessity for restoring and protecting nature, a healthy environment and thriving and resilient food production systems in Europe.**

**The urgent need to reduce pesticides is loudly called for by scientists<sup>2</sup>, citizens and many farmers.** Through Eurobarometers and multiple consultations (e.g. the Conference for the Future of Europe), as well as through two European Citizens' initiatives, Europeans expressed their will to ambitiously reduce pesticides<sup>3</sup>. An IPSOS Poll from 2023 showed a high

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<sup>1</sup> [Our global food system is the primary driver of biodiversity loss](#), [European climate risk assessment](#), EEA, 2024, [Europe's state of water 2024: the need for improved water resilience](#), EEA, 2024, [More than 75 percent decrease in total flying insect biomass over 27 years](#), [Direct pesticide exposure of insects in nature conservation areas in Germany](#), [Farmland practices are driving bird population decline across Europe](#), [How pesticides impact human health and ecosystems in Europe](#), [Pesticides and Soil Invertebrates: A Hazard Assessment](#), [Pesticide effects on soil fauna communities-A meta-analysis](#), [Scientists support the EU's Green Deal and reject the unjustified argumentation against the Sustainable Use Regulation and the Nature Restoration Law](#), Inserm, 2021, [Collective Expert Review on the Health Effects of Pesticides](#), EEA, 2023, [How pesticides impact human health and ecosystems in Europe](#), [Silva et al. 2023](#), [Pesticide residues with hazard classifications relevant to non-target species including humans are omnipresent in the environment and farmer residence](#), [Navarro et al. 2023](#), [Pesticide Residues in indoor dust of farmworker households across Europe and Argentina](#), [Figueiredo et al., 2019](#), [Spatio-temporal variation of outdoor and indoor pesticide air concentrations in homes near agricultural fields](#), [Martin-Reina et al., 2021](#), [Adverse Health Effects in Women Farmers Indirectly Exposed to Pesticides](#), [Doğanlar et al., 2018](#), [Nonoccupational Exposure of Agricultural Area Residents to Pesticides: Pesticide Accumulation and Evaluation of Genotoxicity](#)

<sup>2</sup> [6000 scientists in support of the SUR and NRL](#), [Expression of Concern by Scientific associations: Rollback of EU environmental legislation and policies jeopardises the future of EU citizens \(V2\)](#), [We need a food system transformation – in the face of the Ukraine war, now more than ever](#), [Scientists call for ambitious Sustainable Use of Pesticides Regulation](#)

<sup>3</sup> Of the 10 successful ECIs that have been submitted to the European Commission, 2 focused on pesticides. Through the ECI ['Save Bees and Farmers'](#), citizens asked for ambitious pesticide reductions to protect health, environment, biodiversity, long-term food food security and long-term perspective for farmers. More than 1 million citizens asked the European Commission and the Member States for a ban on glyphosate and ambitious pesticide reductions, through a successful [ECI, for a ban on glyphosate](#)

and constant agreement in 6 Member States from different EU zones, on the need for protective pesticide legislation, uptake alternatives to pesticides and to stop financial support to harmful agricultural practices. However, the Save Bees and Farmers (2023) and Stop Glyphosate (2017) ECI's, which demanded ambitious reductions of pesticide use, are still waiting for concrete answers and actions from EU policy makers.

PAN Europe has analysed the report of the Strategic Dialogue on Agriculture. **We set out below:**

- **Important outcomes and recommendations of the SDA report linked to pesticide use (in box)**
- **Concrete needed actions for their implementation, and for uptake in the EU Vision for Agriculture and Food**

**1. The SDA report supports and commits to the maintenance and enforcement of existing legislation and to finding actionable leverages to improve its implementation.**

**Relevance for pesticide policies/needed policy actions for implementation:**

- **The full implementation and enforcement of the Sustainable Use of Pesticides Directive 2009/128/EC (SUD)<sup>4</sup>.** This includes the effective protection of citizens and the environment, and the complete implementation of high-level Integrated Pest Management (IPM), which should lead to effective reduction in pesticide use and risk. Although the SUD made IPM mandatory since 2014, its implementation is largely absent. Citizens and nature remain inadequately protected. The lack of implementation of the Directive and the lack of ambition in the National Action Plans (NAPs) were underlined in multiple analyses by EU institutions<sup>5</sup>.
- The lack of IPM Implementation, and therefore the lack of reduction of pesticide use, highlights the urgent need to **define crop-specific IPM rules in order to ensure implementation of the mandatory IPM principles of the SUD. It is essential that all IPM principles as defined in Annex 3 of the SUD are effectively implemented for all cropping systems.** It is key that farmers truly **switch to practices with the lowest risk to human health and the environment among those available for the same pest**

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(2017), [IPSOS Citizens Poll on Pesticides \(2023\)](#). The final report of the [Conference for the Future of Europe](#) included the need for high environmental ambition in food production systems, and to drastically reduce pesticide use (2022), The [Eurobarometer survey on Food safety](#) in the EU listed pesticide residues in food as the most frequently selected concern related to food safety (2022), [EU public consultation on the Common Agricultural Policy](#): respondents showed a concern for environmental challenges, such as the prevention of biodiversity loss and prevention and reduction of water pollution (pesticides, fertilisers) (2017)

<sup>4</sup> [Sustainable Use of Pesticides Directive 2009/128/EC \(SUD\)](#)

<sup>5</sup> 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)

**problem, with pesticides truly only used as a last resort.** The defining of crop-specific IPM rules to implement the IPM principles should be **based on best available IPM practices**, independent scientists and networks of independent experts and farmers, such as within the IPMWorks Networks<sup>6</sup>.

- **The full implementation and enforcement of the Pesticide Regulation EC 1107/2009.** The extensive gaps in implementation and enforcement have been repeatedly highlighted by scientists and PAN Europe, as well as by the PEST Committee of the European Parliament<sup>7</sup>.
- **The full implementation and enforcement of the Water Framework Directive (WFD), the Habitats (HD) and Birds Directive (BD) and the Nature Restoration Law (NRL), as well as other existing and future EU legislation, such as the Soil Monitoring and Resilience Directive.** Given the major role of pesticide use in undermining the requirements and objectives of above-mentioned legislations, ambitiously tackling pesticide use and risk is essential to meet their legal requirements.

## **2. The SDA report underlines the need to reduce external inputs such as pesticides**

### **Relevance for pesticide policies/needed policy actions for implementation:**

Due to the lack of implementation of relevant legislation, pesticide sales data have not been showing decreasing trends, contrary to misleading communications by DG Sante<sup>8</sup>.

Effectively reducing pesticides, as called upon by scientists, citizens, the Green Deal, ECI's and the Strategic Dialogue, requires:

- **Full implementation of above-mentioned legislation.** It is essential that focus lies on a **system change of ambitious implementation of nature-inclusive, resilient agroecological cropping systems.** For many cropping systems and pedoclimatic

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<sup>6</sup> IPMWorks

<sup>7</sup> 10 recommendations to close the gaps in EU pesticide authorisation

<sup>8</sup> Special report 20/2024: Common Agricultural Policy Plans – Greener, but not matching the EU's ambitions for the climate and the environment, Flaws Harmonised Risk Indicator: As the methodology is based on quantities, without a link with the application rate/ha, the risk of particularly toxic substances is heavily underestimated, while the risk of less harmful substances, that are used in larger quantities, is greatly overestimated. Moreover, a special higher weighting factor of 64 is given for banned active substances. When a substance is banned, it changes categories and receives, also retrospectively, a higher weighting factor. This gives the impression that the use and risk has strongly decreased, because the substance's weighting factor has, also retrospectively, increased through the change in category, while in practice nothing has changed. The 4 categories of active substances (AS) used for calculation of the HRI (*low-risk AS (WF1)*, *all other approved AS (WF8)*, *candidates for substitution AS (WF16)*, *not approved AS (WF64)*) don't allow for a robust, science-based weighting of the various levels of toxicity of different AS. For example, a very large group of substances belongs to the 2nd class, while these substances have a wide variety of different levels of toxicity. At the same time, the 'not approved' substances can also include, for example, low-risk (or any) substances waiting for reapproval, which will then all receive the high weighting factor of 64.

conditions, effective IPM schedules are available, shown by farmers across Europe. Crop rotation, strip cropping, crop diversification, monitoring, mechanical weed management, enhancement of functional biodiversity, ... should be maximally implemented. Focus should lie on working with nature, rather than against nature, fostering soil health, natural pest control and pollination.

- Technology and innovation can help increase the implementation of IPM. For example, **newly emerging tools for mechanical weeding management, crop/pest monitoring and biocontrol** can greatly contribute to IPM implementation. It is essential that all tools are used within the framework of implementation of all IPM principles. Precision farming in itself is not IPM per se: IPM includes a variety of steps (Annex 3 - SUD) and focuses on prevention, fostering natural pest control, diversification and resilience, and decreasing vulnerability of cropping systems against pests, **with pesticides only used as a very last resort**. Any prophylactic pesticide application can therefore not be considered IPM. Herbicide resistant and insecticide producing GMOs can not be part of sustainable cropping systems.
- Setting **ambitious reduction targets and timelines to reduce pesticides, starting with an immediate ban of the most toxic pesticides** (candidates for substitution and other carcinogenic, mutagenic, reprotoxic, endocrine disrupting, neurotoxic, PFAS and bee-toxic pesticides).
- **Detailed pesticide use data and a robust pesticide use and risk indicator**. The Commission's Harmonised Risk Indicator 1 (HRI1) to measure trends in pesticide use and risks, including progress towards the Farm to Fork pesticide reduction objectives, is unfit for purpose. The indicator misleadingly shows reductions where none take place<sup>9</sup>. In order to provide citizens with transparent and scientific information, pesticide use data and a robust indicator are key.

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<sup>9</sup> Misleading calculation: EU plans for pesticide reduction at risk, EU Commission spreads unscientific information about pesticide reduction, Special report 20/2024: Common Agricultural Policy Plans – Greener, but not matching the EU's ambitions for the climate and the environment

### 3. The SDA report underlines the need to enhance sustainable farming practices

- The SDA recognises the triple crisis of climate change, pollution, and biodiversity loss as the most imposing challenge of planetary scale, and the urgent **need to transition to sustainable food systems**.
- The SDA emphasises that **crops are increasingly vulnerable to pests and diseases**, and that the **decline of biodiversity undermines soil fertility, natural pest control and pollination**. Depleted and polluted soils are less fertile and flood resistant, and diminished in their ability to store both carbon and water.
- The SDA underlines the need to **reduce GHG emissions**, and recommends a comprehensive methodology for accounting and setting sectoral goals. This methodology should capture the **full ecological impact of the agricultural systems**, and **should also account for all externalities related to climate change and ecosystem services 'like biodiversity, pesticide use, and soil health'**.
- The capacity of **organic farming and agroecological solutions** to reduce negative externalities and produce positive externalities while being economically viable, is highlighted.
- The SDA underlines the need for the development and use of biocontrol to help reduce pesticides, also given the fact that conventional pesticide products keep disappearing from the market. The report recommends that the Commission enables a **robust legislative framework for biocontrol products and approaches** to prioritise fast-track authorisation processes, aiming to implement shorter timelines while always following proper scientific assessments in terms of efficacy and safety.
- The report calls for **scaling up of sustainable farming practices and new business models** to promote efficient use of natural resources, such as water, **less reliance on agricultural inputs, the protection of soils, the restoration of nature and the diversification of crops** and animal breeds.
- The recommendations highlight that **soil health** is a priority for sustainable agriculture. **Reducing the impact of chemical inputs such as pesticides**, improving biodiversity and supporting sustainable land management practices are the principles.
- The **vital role of (agro)biodiversity** (e.g. soil micro-biota, earthworms, pollinators and other insects, species in the wider environment of food production, e.g. birds and bats as natural pest controllers, ...) to achieve healthy diets and agroecosystems is emphasized.

### **Relevance for pesticide policies/needed policy actions for implementation:**

- To implement these recommendations and ensure the needed transition, ambitious reductions in pesticide use and risk are critical. **Ambitious policy actions to effectively reduce pesticides, and banning the most harmful pesticides immediately**, should therefore evidently have a central role in the Commission's work plan for agriculture.
- It is, as the SDA recommends, key that in the **assessment of climate change impacts**, also the impact on biodiversity and ecosystem services, such as for example the impact of pesticides, is taken into account. **In addition to pesticides' impact on biodiversity and ecosystem services, their production and use is directly responsible for high CO<sub>2</sub> emissions<sup>10</sup>.**
- **Biocontrol** plays an important role in implementing IPM and reducing pesticides. It is essential that biocontrol is always applied within the framework of IPM principles, based in priority on the prevention of pests. Implementation of all IPM principles, such as enhancement of functional biodiversity and natural pest control, is needed for biocontrol tools to reach their full potential. Member states should ensure enough capacity and expertise to carry out the regulatory procedures regarding biocontrol in line with legal deadlines.

#### **4. The SDA report proposes new delivery model for sustainability**

The SDA expresses the necessity to significantly improve the delivery of sustainability. To ensure the EU's sustainability objectives are reached, the report underlines **enforcement, stronger efficacy of existing legislation and further harmonisation** is needed.

- Enforcement of legislation is key (see higher), and **requires farmers to have a clear overview of all EU and national environmental and other relevant legislation applicable to their farms**. These obligations, finds the report, should be translated to *clear and actionable on-farm obligations*.
- Member States (MS) should have well resourced implementation agencies, and "sufficient means to **investigate and detect non-complying actors**, and apply dissuasive and proportionate sanctions.
- The SDA calls for a **new sustainability benchmarking system in agriculture and food systems**.
- The benchmarking system should measure where each sector and farm stands, compare status on sustainability objectives (e.g. biodiversity conservation and restoration, reduction of pollution, ...). It should rely on **scientifically sound indicators**.
- The Farm Accountancy Data Network (FADN) should be further developed into the Farm Sustainability Data Network (FSDAN) and implement methodologies to collect sustainability data at farm level. These data should be used to assess sustainability indicators, test data collection methods for farmers and monitor sustainability.

<sup>10</sup> Pesticides and Climate Change: A Vicious Cycle

- In the future, a methodology for product-level assessment needs to be developed. Each **certification/standard** will have to be duly assessed for its contribution to the objectives and targets of a specific regulation or element within it and **only be acknowledged if it adequately complies or goes beyond its goals.**

### **Relevance for pesticide policies/needed policy actions for implementation:**

These recommendations of the SDA should translate into concrete policy actions to tackle the extensive shortcomings in implementation of pesticide legislation and ambitiously reduce pesticides:

- *Clear and actionable on-farm obligations* should include **clear crop-specific (and regional- and soil- specific) IPM rules to ensure implementation of the mandatory IPM principles of the SUD.** The rules should be based on best available IPM practices and the practices with the lowest risk to human health and the environment among those available for the same pest problem (see higher).
- The FSDN should include data collection on pesticide use and implementation of IPM measures. Indicators of a benchmarking system should include IPM indicators developed by experts, and indicators on the level of pesticide reduction. It is essential that a comparative exercise across farms and sectors leads to continuous implementation of best available IPM practices and most ambitious achieved pesticide reductions.

### **5. The SDA recommends adaptations to CAP**

The report acknowledges the criticism on the CAP regarding sustainability, fairness, complexity and lack of clear link between measures and objectives. The SDA highlights that there is a need for a CAP fit for purpose.

- The CAP should deliver **support in a much more targeted way**, moving away from current non-decreasing area-based payments.
- The CAP should properly **reward and incentivise to provide ecosystem services:** 'A system of targeted and result-oriented environmental payments would offer farmers stable and predictable supplementary income, thus helping stabilize incomes, while delivering taxpayers clear value for their money'.
- These schemes must be designed, managed and controlled jointly by environmental and agricultural authorities. Such **environmental payments should go beyond what is required by EU legislation and aim at the highest** environmental, climate and animal welfare **ambitions.** Rewarding payments should be conditioned on quantifiable outcomes that are measured by **robust indicators.**
- The **budget allocated to environmental measures should substantially increase** over the following 2 CAP periods.

### **Relevance for pesticide policies/needed policy actions for implementation:**

- It is essential to fundamentally change the allocation of funding, and to urgently phase out area-based direct payments.
- **Public funds should be exclusively allocated to result-based measures providing clear benefits and public goods.** No public funds should be spent on practices harmful for the climate, environment and biodiversity.
- **Funds should be managed by environmental, agricultural authorities and other relevant authorities.** Agricultural land takes up about half of the area of the EU, and should provide a wide variety of ecosystem services to safeguard a thriving and healthy future for EU citizens.
- **All obligations of EU pesticide legislation should be part of CAP policies, being part of the legal baseline, including application of IPM.** Farmers should be **supported during the transition to reduce pesticides** and fully implement all IPM principles (see further). Support should be based on effective pesticide reductions.
- Farmers should be supported for **providing ecosystem services**, when taking measures that go beyond EU legislation, for example, **when taking measures which go beyond the mandatory IPM principles.** Support should be based on effective results, including effective pesticide reductions.
- The robust indicators and quantifiable outcomes to condition environmental payments, should include **indicators on quantifiable pesticides reductions.** E.g.: the area under commitment of reducing pesticides by 50%, 80% or 100% in e.g. 3 years.

#### **6. The SDA report recommends support for the transition**

- The SDA report includes recommendations to support the transition, financially and in providing the right supportive framework, e.g. in the form of independent advice.
- The SDA underlines that independent advisory services are crucial for better access to and better use of knowledge and innovation. **Dedicated training and independent advisory systems** need to be made largely available.

### **Relevance for pesticide policies/needed policy actions for implementation:**

- All farmers should have access to independent **advisory systems which are equipped to provide high-expertise independent advice on IPM and crop-specific rules to ensure implementation of mandatory IPM principles.** Training on IPM is already **mandatory according to the SUD, but not properly implemented**, or not at all, by Member States. Existing regional or local networks of knowledge exchange between farmers and independent advisors have been shown to be very effective (e.g. IPM Works project<sup>11</sup>).

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<sup>11</sup> <https://ipmworks.net/>

## **7. The SDA report calls making the healthy and sustainable choice the easy one**

- The report calls for the **adoption of policies** by the Commission and Member States **which address the whole food system**, to create food environments with sustainable, accessible, affordable and attractive healthy diets.
- **Public procurement**, school schemes and fostering of food literacy are mentioned as key tools.
- It is essential, finds the report, to ensure that consumers are provided with **trustworthy, comprehensive, EU-wide, science-based, comparable and transparent food labelling** that is easily accessible, understandable, and usable and allows for informed choices about key sustainability dimensions of food, including animal welfare, while considering the feasibility for operators.

### **Relevance for pesticide policies/needed policy actions for implementation:**

In regards of the above, it is essential that:

- **The whole food chain is engaged in and bound to implementing legislation, implementing IPM and reducing pesticides.** Wholesale food suppliers and retail should establish action plans to establish long-term contracts with farmers applying crop-specific IPM rules and committing to a zero-pesticide-residue policy.
- **Citizens have easy and full access to digital data on pesticide use and applied IPM measures, at product level as well as on farm-level scale**
- Citizens have access to **correct information on the impact of pesticides** on the environment, biodiversity and health, and obligations of EU and national authorities regarding pesticides.

## **8. The SDA recommends ending practice of unethical double standards, including a stop to exports of banned pesticides**

### **Relevance for pesticide policies/needed policy actions for implementation:**

- **Exports of in the EU banned pesticides**, with detrimental impacts on health and environment, **must indeed be halted immediately**. It is essential to achieve the EU's objectives on sustainable and fair trade policies.
- An investigation conducted by Public Eye shows that **a total of 81 615 tonnes of 41 banned pesticides were exported from the EU for agricultural use in 2018**. Looking beyond crop protection, 82 banned pesticides were exported outside the EU in 2022.

- These pesticides find their way back to Europe as residues in food. A recent report found that **69 banned and hazardous pesticides were detected in European food**<sup>12</sup>.
- **Stopping the export of EU-banned pesticides would neither endanger employment nor burden the EU economy.** On the contrary, a ban would positively impact people's health and the environment in importing countries<sup>13</sup>.

## 9. Attractiveness of rural areas

The SDA calls for building an attractive sector and attractive rural areas, and ensuring generational renewal, with current generations bearing the responsibility for the economic and living conditions of future generations: *'This responsibility is particularly important when working with and in nature'*. The report highlights the importance of protecting workers, through e.g. safer working environments and full implementation of social conditionality in CAP in all Member States.

### **Relevance for pesticide policies/needed policy actions for implementation:**

#### **Ambitiously reducing pesticides is vital to:**

- Ensure **safe and healthy rural areas**. Farmers, farmworkers and inhabitants of rural areas are most exposed to the health risks of pesticides. Pesticide exposure has been linked to an increased risk for a variety of health conditions, including neurodegenerative diseases such as Parkinson's disease, developmental delays and cognitive impairments, heart and respiratory diseases, forms of cancer and reproductive disorders. In France, Italy, and Germany, Parkinson's disease is recognized as an occupational disease for farmers. The profession of farming, and living in the countryside, have lost their healthy connotation.
- Ensure a **long-term perspective for farmers**. We rely on biodiversity for essential provisions, such as food production, healthy soil functioning, natural pest control, pollination, adaptation and mitigation to climate change, and to secure overall resilience of our environment and agricultural system
- Tackle the collapse of biodiversity and **foster attractive rural areas**. Citizens do not want to spend time in monotonous deserts, during silent springs, while being continuously exposed to pesticides. The rise of the 'experience economy' shows that citizens highly value discovering biodiversity and wildlife, while science shows that natural environments foster mental well-being.

<sup>12</sup> [Double standards, double risk: Banned pesticides in Europe's food supply](#)

<sup>13</sup> [EU pesticides export ban: what could be the consequences?](#)

## **10. The SDA recommends the establishment of a European Board on Agri-food (EBAF)**

- The SDA recommends the establishment of a European Board on Agri-food (EBAF), formed by the agri-food value chain actors, civil society organisations and scientists.
- The EBAF should identify strategies necessary to the implementation and further development of the Strategic Dialogue's conceptual consensus in order to make agri-food systems more sustainable and resilient.

### **Relevance for pesticide policies/needed policy actions for implementation:**

- It is essential that all relevant actors are represented in the structure proposed. Independent experts/scientists should play a prominent role, to ensure science-based decision making. It is key that farmers leading in sustainability, e.g. in ambitiously implementing Integrated Pest Management and other agroecological practices, are at the table. Best available practices should lay down the level of ambition for the work of the board.

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