

Pesticides Action Network

PAN Europe

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The Honourable Margot Wallström
Commissioner, Environment

cc.: Commissioners Fischler, Byrne

national ministers: Funke - G; Aelvoet - B; Gabriels - B; Auken - DK; Kristensen- DK; Pronk - NL;
Borst-Eilers - NL; Brinkhorst - NL; Winberg - SE; Brown - UK

European Union policy on pesticides

10/3/00

Dear Commissioner Wallström,

Soon, the European Commission will publish a communication on the sustainable use of plant protection products (ppp's), based on the Fifth Environmental Action Programme and its legal obligation to "substantially reduce the use of pesticides". The Pesticide Action Network Europe (PAN Europe), together with 38 European organisations, urges the Commission to use this opportunity to set new and progressive standards in pesticides (including biocides) policy, as outlined in the attached PAN Europe Position.

Current pesticide use in the EU is far from sustainable. Water and air are polluted with pesticides, not only in Europe, but also in remote areas throughout the entire world. The wide-ranging, negative and long-term effects of pesticide use, such as disruption of endocrine, immune and nervous systems, are still unknown. Repetitive food scandals have seriously undermined consumer confidence in the food they eat. In parallel, major European food retailers are beginning to set their own standards for food production, in the absence of EU regulations. Faced with this situation, the European Union and its member states must begin to take action now, and support a reduction in the use of pesticides.

The Pesticides Action Network has worked globally on ways in which to reduce reliance on pesticides world-wide. PAN Europe co-ordinates non-profit NGOs throughout Europe and, with the backing-up of these organisations, is demanding a substantial change in pesticides policy in Europe.

With respect to the soon to be published Commission Communication, PAN Europe strongly suggests that the Commission incorporates many of the recommendations described in the attached policy paper within a future EU pesticides policy.

We would be delighted to meet with you or any members of your cabinet to share our experiences and answer any questions you may have.

Yours sincerely,

Heike Schmitt
PAN Europe

Together with 38 co-signing organisations

PAN Europe is coordinated by **PAN Germany** and the **Pesticides Trust**. It is the European Regional Centre of the **Pesticides Action Network**, a global coalition of citizens groups and individuals who oppose the unnecessary use and misuse of pesticides and support reliance on safe sustainable pest control methods. PAN Europe is a foundation incorporated in the Netherlands.

PAN Europe Position on European Pesticides Policy

Together with 38 European organisations, PAN Europe calls on the European Union to set new and progressive standards in pesticides (including biocides) policy, as outlined in this policy paper. The paper is based on the PAN Europe Position Paper on Pesticides Reduction, and describes in more detail the most urgent steps towards a substantial reduction of the use of pesticides - a commitment already adopted by the EU ministers in 1993 with the Fifth Environmental Action Plan.

It is of utmost importance that future EU pesticides policy overcomes a dangerous and ineffective reliance on pesticides registration as the single policy tool.

Minimum steps towards a European pesticide reduction

1. National pesticide reduction programmes
2. Environmental programmes at farm level
3. High level VAT or levies on pesticide products
4. EU-wide monitoring of pesticide production, use and incidences
5. More stringent pesticide residue levels in food
6. Revision of 91/414/EEC
7. Integration of pesticide issues within the strengthened EU health policy

1. National pesticide reduction programmes

During the PAN European workshop "sustainable use of plant protection products", national pesticide reduction programmes were judged to be an effective, efficient and enforceable instrument to achieve a reduction of the use of pesticides. PAN Europe therefore calls on the European Commission to require Member States to establish national pesticide use reduction programmes within five years, and contribute to 25% of their costs. Targets of these programmes (if not already existing) should be

- ⇒ a reduction of the use (kg/ha) of pesticides of 50% in 5 years for each individual crop;
- ⇒ a reduction of the spraying frequency of 50% in 5 years;
- ⇒ non-spraying zones along water-sheds, private houses and nature sites;
- ⇒ targets for biological agriculture (10% of the cultivated land in each EU-country in 5 years);
- ⇒ inspection of spraying equipment and training of sprayers.

2. Environmental programmes at farm level

A reduction plan can only function if the overall targets are broken down into individual targets at farm level. To this end, the following is needed:

- ⇒ Develop principles for Good Agricultural / Plant Protection Practices on a European scale
- ⇒ establish a "GAP office" to develop and make topical agricultural schemes

3. High levels of VAT or levies on pesticide products

In order to increase the means for funding for research and extension programs and achieve significant reduction of pesticide use through pricing, PAN Europe calls for

- ⇒ a high level VAT on pesticide products (synthetically produced pesticides),
- or
- ⇒ levies on pesticide products (€20 per kg) - resulting fees to be used for conversion to biological agriculture.

4. EU-wide monitoring of pesticide production, use and pesticide incidents

The European Commission plans to implement a co-ordinated monitoring programme for pesticides residues in food. PAN Europe supports this idea in principle. However, to effectively monitor reduction of pesticides and link pesticide use with health and environmental risks, it is imperative to:

- ⇒ establish national and Europe-wide mandatory and publicly available inventories of
 - pesticide production
 - pesticide use per crop and area
 - monitoring and surveillance of pesticide poisoning and pollution incidence reporting (both agricultural and non-agricultural).

5. More stringent pesticide residue levels in food

The Commission Communication on the Precautionary Principle addresses health effects of pesticide residues and states that the evaluation of new and existing pesticides should be accelerated, in order to promote the use of safer pesticides. PAN Europe believes existing gaps in scientific knowledge of health effects of pesticide residues will not be filled in at short-term and it can be doubted if ever. Therefore, it is needed to apply the "ALARA" principle (mentioned in the Commission Communication on the Precautionary Principle): set the maximum residue limit for pesticides as low as reasonably achievable. Companies have already taken this step and have adopted the principle of setting a 0,01 ppm (absence) level for pesticide residues in their products.

- ⇒ The EU should bring the pesticide levels in all food and animal feed in line with the more stringent measures recently adopted for baby food

6. Revision of directive 91/414/EEC

Several shortcomings of the directive 91/414/EEC, harmonising standards of pesticide registration, have been noted in the project "possibilities for future EU environmental policy on plant protection products". PAN Europe calls that the following improvements should be included, when Directive 91/414/EEC is going to be amended in 2002:

- ⇒ ensure greater transparency and consultation with public interest groups
- ⇒ take action to address data gaps, combination effects, newly recognised effects like endocrine disrupting potential and immunotoxicity, and include cut-off values for intrinsic properties (such as toxicity, bioaccumulation, and persistence)
- ⇒ include a provisional approval and the evaluation of "inert" ingredients in pesticide products;
- ⇒ extend the comparative assessment of pesticides and the substitution principle to 91/414/EEC
- ⇒ set standards for air pollution
- ⇒ include the principle of "no use of synthetic pesticides, unless no non-chemical methods and techniques are available".

7. Integration of pesticide reduction in EC-policy

The EC White Paper on Food Safety proposes a general food Law Directive which defines responsibilities of producers and suppliers and traceability along the food chain, including effective control and enforcement. The communication on ppp's should be in line with these proposals and, together with the certification of producers,

- ⇒ oblige suppliers to have a close system of registration and traceability of food products with independent control.
- ⇒ In the CAP-programme pesticide reduction and certification should be an environmental condition for every individual farmer.

Organisations supporting the PAN Europe Position on European Pesticides Policy:

1. Ärztinnen und Ärzte für eine gesunde Umwelt (ÄGU)	Austria
2. Asociación Vida Sana	Spain
3. Association Concentropique	France
4. Bond Beter Leefmilieu	Belgium
5. BUND - AK Umweltchemikalien und Toxikologie	Germany
6. Center for Environmental Studies	Hungary
7. Comisiones Obreras	Spain
8. Coordination gegen Bayer-Gefahren e.V. (CBG)	Germany
9. Co-ordination Paysanne Européenne	Belgium
10. Danish Ecological Council	Denmark
11. Ecological Council	Russia
12. EPHA - European Public Health Alliance	Belgium
13. European Environmental Bureau, EEB	Belgium
14. France Nature Environnement	France
15. Friends of the Earth EWNI	UK
16. Green Doctors - ISDE Ukraine	Ukraine
17. Green Federation Cracow	Poland
18. Greenpeace Belgium	Belgium
19. IFOAM	Germany
20. Inter-Environnement Wallonie	Belgium
21. IUF	Switzerland
22. LPN	Portugal
23. Malopolska Union of Organic Farming	Poland
24. Ökologischer Ärztbund - German section of ISDE	Germany
25. Österreichische Bergbauernvereinigung	Austria
26. PAN Belgium	Belgium
27. PAN Europe	Germany
28. PAN Germany	Germany
29. Seas at Risk	the Netherlands
30. SiD Specialarbejderforbundet	Denmark
31. Svenska Lantarbetareförbundet, SLF	Sweden
32. Soil Association	UK
33. Stichting Natuur en Milieu	the Netherlands
34. The Food Consultancy	UK
35. The Pesticides Trust	UK
36. Women's Environmental Network	UK
37. WWF European Toxics Program	UK
38. WWF European Agriculture and Rural Development Program	UK
39. WWF Germany	Germany

