



**Pesticide
Action
Network**
Europe

Making Ecological Focus Areas pesticide-free is the only way forward

‘Ecological focus areas should be established, in particular, in order to safeguard and improve biodiversity on farms’
Recital 44 of Regulation (EU) 1307/2013

The European Commission is proposing to ban use of pesticides in productive areas of the so-called Ecological Focus Areas as part of the simplification and streamlining exercise ‘greening after one year’. PAN Europe and its members welcome this proposal as a logical step to put biodiversity at the heart of EFAs and urge all MS to support it.

In the 2013 reform of the CAP, the idea of a green component was introduced whereby larger farms must provide areas “*to safeguard and improve biodiversity on farms*”. These areas are known as Ecological Focus Areas (EFAs) and have certain elements which could be considered as the ‘sensitive areas’ agreed upon in Cardiff almost 20 years ago, when the EU took its first, tentative steps towards sustainable agriculture [1].

Member States have been able to select one or more of the following as ecological focus areas: (a) land lying fallow; (b) terraces; (c) landscape features (amongst them e.g. **field margins**), **(d) buffer strips**; (e) hectares of agro-forestry; (f) strips of eligible hectares along forest edges; (g) areas with short rotation coppice with no use of mineral fertiliser and/or plant protection products; (h) afforested areas; **(i) areas with catch crops, or green cover and (j) areas with nitrogen-fixing crops.**

Only a few Member States have introduced restrictions on pesticides use: three for catch crops (BE Flanders + Wallonia, DE, NL) and one for nitrogen-fixing crops (BE, Wallonia).

The European Commission analysis entitled “greening after one year” [2] specifies that Ecological Focus Areas linked to a productive activity — nitrogen-fixing crops and catch crops — account for 73.1 % of the total EFA area before the application of weighting factors. The European Commission’s proposal on simplification and mainstreaming of green payment is proposing to ‘*ban pesticide use in productive part of EFAs (land lying fallow, catch crops and nitrogen-fixing crops)*’.

18 Member States issued a joint statement ahead of the EU agricultural Council of 10 October 2016 contesting the Commission proposal. These Member States claim that such a proposal will ‘*directly limit the productive decisions of farmers*’ [3]. However, applying pesticides on flowering leguminous crops can be particularly harmful to biodiversity, creating death traps for the remaining natural insect fauna. So we approve of the idea behind Commissioner Hogan’s statement in the meeting of the European Parliament’s Agriculture Committee on 12th October 2016: ‘*Farmers can use pesticides on 95% of the land, but the EFAs should be left for biodiversity*’. However, in reality it appears that with 73% of the EFAs already devoted to intensive production, the 95% figure is effectively 99%! This needs to be changed.

The 18 Member States are also arguing that the proposal is an ‘*unjustified manner to increase the baseline for agri-environment-climate measures of the CAP.*’ PAN Europe instead finds

that this is the bare minimum to bring ecology into EFAs, as otherwise there is almost nothing ecological about them.

We strongly urge the European Commission to stick rigorously to the proposal and to build on widespread public and political support to resist the sectoral interests driving some Member States' positions. We recall the report from the European Economic and Social Committee which said: *“the use of pesticides in ecological focus areas is diametrically opposed to the intention of greening agricultural policy: pesticides do not help to increase biodiversity but damage it”*. [4] We note also the calls from MEPs across the political spectrum to *“ensure legislation is fit for purpose”*, making sure the EFAs do what they were intended to do *‘to safeguard and improve biodiversity on farms’* as per recital 44 of Reg.1307/2013 *“by boosting natural processes and so strengthening the ecosystem functions that are essential for the long term productivity and intrinsic fertility of our food production systems”*. [5]

Biodiversity is not an optional add-on to farming, but a vital component.

84% of the world's crop diversity relies on insect pollination and almost all crops benefit from natural pest control services [6]. Permitting a diversity of auxiliary insect populations to develop allows a natural equilibrium to be restored between insects helpful and harmful to the crops. A range of recent research projects with commercial growers in the UK, the Netherlands and Switzerland, where low-maintenance flowering field margins were created to specifically target beneficial pollinators and natural pest control services through the choice of appropriate non-crop vegetation, show that farmers can significantly increase yields in adjacent crops. [7]

We note that although yields are not the only determinant for farmers' incomes, the functional biodiversity that includes beneficial species delivering key services supporting crop growth and sufficient yields takes time and appropriate choices to build itself up. Comparing conventional systems using pesticides with those same systems immediately after cutting out pesticides is not a fair test: once the right species are in place, the yield gap is much smaller than often portrayed. [8]

PAN Europe and its members encourage the Member States, in order to benefit farmers and to reduce the need to use pesticides in the first place, to include far more nature-friendly landscape elements that attract functional biodiversity. It is important to desist from using pesticides in EFAs because they are attractive to pollinators and insects providing natural pest control. Use of pesticides on EFAs would create death traps for the many insects residing there and further undermine the services they provide.

The link between decline in biodiversity on European farmland and pesticide use has been well-documented by scientists over many years. A recent study using data from nine European countries concludes: *“If biodiversity is to be restored in Europe and opportunities are to be created for crop production utilising biodiversity-based ecosystem services such as biological pest control, there must be a Europe-wide shift towards farming with minimum use of pesticides over large areas.”* [9]

Besides, we do not understand how the EU is investing so much speech, time and resources into nature-based solutions, namely on its Innovation and R&D policies and programmes and considers leaving behind simple, cost-effective and well-known nature-based solutions for

agriculture, such as ensuring proper habitats for crop pollinators and other functional biodiversity (obviously using no pesticides).

Introducing more landscape elements would not only be good for biodiversity but even reach the policy objective from Back in 1999 where agricultural ministers – in the Agricultural Council of Cardiff – set specific objectives for agrochemicals into the Common Agricultural Policy (CAP): “to reduce the environmental risks of pesticide use (water contamination, deterioration of biodiversity, etc., further measures should be developed for sensitive areas.”

Footnotes:

[1] In 1999 agricultural ministers – in the Agricultural Council of Cardiff – set specific objectives for agrochemicals into the Common Agricultural Policy (CAP) agreeing: “In addition to EU rules to control maximum levels of pesticides in farm produce and measures to reduce the environmental risks of pesticide use (water contamination, deterioration of biodiversity, etc.), further measures should be developed for sensitive areas.”

[2] European Commission review of Greening after one year; SWD(2016) 218 final, part 3/6

[3] <http://data.consilium.europa.eu/doc/document/ST-12856-2016-INIT/en/pdf>

[4] Opinion by the European Economic and Social Committee of 21 September 2016 on the biodiversity policy of the EU, Article 4.7.4, <http://www.eesc.europa.eu/?i=portal.en.nat-opinions.38740>

[5] Cross-party group of 33 MEPs writing to Commissioner Hogan on 7.10.2016: http://www.greens-efa.eu/fileadmin/dam/Images/Topics/Agriculture_and_fisheries/PPP_on_EFAs_letter_10_10_2016.pdf

[6] Gallai N, Salles J/M, Settele J., Vaissinère B.E. (2009), Economic valuation of the vulnerability of world agriculture confronted with pollinator decline, *Ecological Economics* 68, 810-821

[7] Olson, D., Wäckers, F.L. (2007) Management of field margins to maximize multiple ecological services. *Journal of Applied Ecology* 44:13-21.

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[8] Liu, H. et al. *Biodiversity management of organic farming enhances agricultural sustainability*. *Sci. Rep.* 6, 23816; doi: 10.1038/srep23816 (2016) <http://www.nature.com/articles/srep23816?platform=hootsuite>

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[9] Geiger et al., Persistent negative effects of pesticides on biodiversity and biological control potential on European farmland, *Basic and Applied Ecology*, 11 (2): 97, 2009

Pesticide Action Network Europe (PAN Europe) was founded in 1987 and brings together consumer, public health, environmental organisations, and women's groups from across Europe. PAN Europe is part of the global network PAN International working to minimise the negative effects and replace the use of harmful pesticides with ecologically sound alternatives.

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