PAN EUROPE NEWSLETTER

Winter 2012/2013

Pesticides Action Network Europe

Introduction

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Dear newsletter readers,

PAN Europe is gradually recovering from the "bad" year 2011 when suddenly our both main funders withdrew their support to us and we were unable to either employ a network coordinator or hold our annual meeting. Other charities replaced the previous funders gradually, which has allowed us to work on the most urgent topics of pesticide regulation including the cut-off principle and endocrine criteria, the pesticide approval process, bees and neonicotinoids, and the Sustainable Use Directive.

We now have four part-time staff and one volunteer in our Brussels office. We have been able to cooperate with our members and allies on these issues, but having a network coordinator is still a big wish for us. PAN-Europe is well established in the Brussels lobby arena, regularly visible in media, and is currently working on some exciting projects. 2013 will be a very important year, as it is the year when implementation of several important issues will be decided on in the EU. By the end of 2013, the Commission will have to present criteria for endocrine disrupting pesticides, make a decision on the neonicotinoid threat to bees, publish a list of substitute pesticide candidates, and by January 2014, European Member States will have to present National Action Plans for the sustainable use of pesticides and implement Integrated Pest Management. PAN Europe and the network will be there, fighting for a cleaner world and to protect people and the environment from harm.

February 2013, Martin Dermine, Isabelle Pinzauti, Henriette Christensen, Maria-Jose Amaral, Hans Muilerman.

Content

1. BEES & NEONICOTINOIDES

November 2012 Bologna meeting on neonicotinoids

Our project on neonicotinoids, aimed at obtaining an EU-wide ban on this class of insecticides which are very harmful to insects and especially to honeybees, led us to organize a meeting with our partners across Europe. Along with our team: Generations Futures (France), Global 2000 (Austria), UNAAPI (the Italian National Beekeepers Union) and members of the university of Bologna), we were joined by BUND (Friends of the Earth Germany) which is also interested on working on this issue. We gathered for a three day meeting in the lovely Italian city of Bologna in November.

The meeting was an opportunity to get to know one another and to exchange knowledge in order to increase the cooperation and effectiveness of the whole group.

Generation Future and Global 2000 shared their experience on residue testing and campaigning and members of UNAAPI presented their campaign work and the opportunities that allowed them to realize a ban on neonicotinoid seed coating on maize in Italy to protect their bees.

University of Bologna scientists exposed their research on the toxicity of neonicotinoids to honeybees and helped us to better understand the European Foods Safety Authority's (EFSA) role in regulation and the game played by the phytopharmaceutical industry who have long known about the toxicity of their molecules on honeybees.

BUND presented their work on informing and educating the general public about pesticides in general and especially on neonicotinoids.

PAN Europe presented its experience with court cases, lobbying at the national and European level, and the overall framework of the project.

This 48 hour get-together was intense and we led to very fruitful exchanges. It is very important to coordinate our efforts in order to not reinvent the wheel and waste time or money, and we believe this meeting has helped us fulfil this the objective. We left energized, happy to have met one another, and with everyone having a better picture of their role in working towards a ban on neonicotinoids and protecting insect fauna.

Fields trip to IPM farmer in Bologna

Bumble bees used as pollinators in glasshouses

The European Commission proposes a partial neonicotinoid ban to protect bees

In a most surprising decision the European Commission has been willing to take in 19 year fight of beekeepers and environmentalists against neonicotinoids, in January, the Directorate General for Consumer Protection and Health (DG SanCo) made a proposal to the Member States (MSs) to ban the use of the three most dangerous neonicotinoids to bees (imidacloprid, clothianidin and thiamethoxam) for 2 years crops that attract honeybees. Under the proposal, maize, sunflower, oilseed rape, and cotton agroindustry would no longer be allowed to use these substances either as seed-coating, granules, or spray. DG SanCo also proposed to ban the private use of neonicotinoids. Hans Muilerman, Chemical Officer at PAN Europe commented, “This is astonishing: it is the first time Commission has been willing to ban a pesticide because of its toxic effect on the environment”.

DG SanCo based its proposal on a report published early this year by the European Food Safety Authority (EFSA) which concluded that these three substances not only pose a high risk of toxicity to bees, through the presence of these toxic insecticides in nectar, pollen, by the dispersal of dusts during sawing of coated seeds, and by the production of guttation droplets (exsudate produced by young plants containing lethal amounts of neonicotinoids). EFSA also mentioned important data gaps to completely assess toxicity on honeybees, wild bees, and bumblebees. The Commission thus proposed a ban based on risk rather than proof, which is remarkable.

But the issue is not yet resolved: this is just a proposal and its outcome will be decided behind closed doors in the opaque European process of voting (comitology) in the Standing Committee on Phytopharmaceuticals. The vote will take place on February 25th and the industry is exerting enormous pressure on member states to influence the vote. Misleading information is spread on the web and the industry lobby publishes false figures, using fear as an instrument to convince them to vote against the Commission’s proposal. Industry funded a non-scientific Humboldt study, published in January, which predicted billions of euros of losses and unemployment, denying the dramatic effect of these substances on the environment, the cost of a lack of pollinators, and the agronomic alternatives that exist to these bee-killers such as crop rotation. Hope is on the horizon. Some member states including Italy, France, Slovenia and Germany banned neonics

years ago and their experience proves that bans improve honeybee's health and there is certainly no danger of a collapse of agriculture. Life is possible without neonicotinoids.

PAN Europe welcomes the Commission's proposal, for the sake of bees but also symbolically, because it shows that the environment can sometimes be taken into account in pesticide policy and take priority over short-term industry economic interest. Nevertheless, we are convinced that these measures are not sufficient, for the protection of honeybees, but also for the health of wild bees and bumblebees. EFSA acknowledged in its report that there is a high risk for wild bees and bumblebees nesting in the ground and this has not taken into account, shown by the fact that neonicotinoids are still allowed to be used on cereals or other crops. Furthermore, we fear a two year ban is not enough, knowing that the half-life of clothianidin can be longer than 1,000 days and that up to 98% of the substance of the coated seed remains in the environment. We will therefore maintain pressure and work towards a long-term full ban on these disastrous pesticides.

Court cases on neonicotinoids

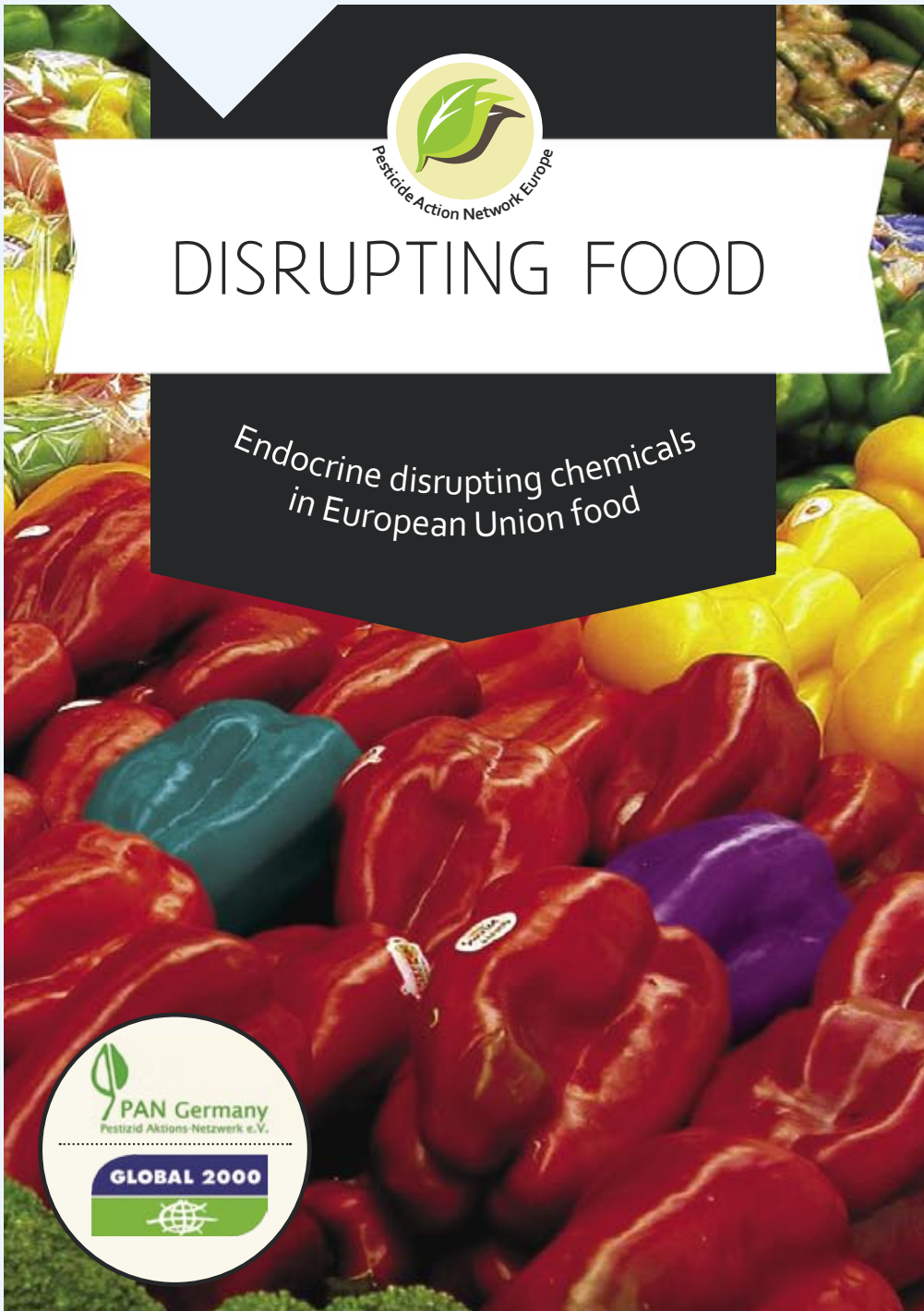
PAN Europe has launched early this year an action at EU-level to protect bees from toxic effect of neonicotinoids insecticides. The European legislation on maximum residue limits (MRLs) states that MRLs should be fixed in order to ensure high level of protection of human and animal health (Regulation 396/2005). The MRLs of neonicotinoids in honey and pollen have been fixed at 10 or 50 μg/kg, depending on the substance.

Sublethal and chronic toxicity experiments have proven adverse effects to bees at very small concentrations (less than 1 μg/kg). Therefore, PAN Europe has introduced a request to lower the setting of MRLs for honey and pollen in order to ensure a better protection of honeybees and respect the European legislation.

Safe food campaign in Austria

In Spring 2012, GLOBAL 2000 was asked by PAN Europe to participate in an initiative to produce a consumer guide that informs European consumers about the endocrine disrupting potential of pesticides in fruit in vegetables and to provide a tool to lobby in favour of strong criteria for characterisation of ED-pesticides by the European Commission through December 2013. We were pleased to work on this important project. The outcome of the analysis was shocking: our calculations on the basis of EFSA-pesticide monitoring data and existing scientific literature on potential ED-pesticides showed that the average European fruit and vegetable from conventional agriculture contains amounts of potential endocrine disrupting chemicals in the range of 300 micrograms to 1300 micrograms per kilogram. Comparitively, the daily dose of the sum of synthetic oestrogen and progesterone of an birth control pill is less than 200 micrograms.

This shocking discovery led to call a press conference on 16 August 2012. The event attracted quite a bit of media attention: all of the four Austrian television stations were present and reported about the press conference, as did Austrian radio. The print media also broadly picked up the issue and day after the press conference, we had around 36 media clippings.



Our call for Austria to remove ED-Pesticides from the list of pesticides that are allowed in “integrated production”, which is part of the Austrian programme for an environmentally sound agriculture (ÖPUL) - financed with hundreds of millions of Euros by the European Union – led to important discussions especially at the Ministry of Agriculture, the AMA (AMA-Gütesiegel is a relatively weak quality label for conventional agricultural products, with broad coverage in austria) and farmer organisations. Some of them blamed were unconstructive and claimed that GLOBAL 2000 was to be blamed for saying that Austrian agricultural products of being unhealthy and dangerous, but there were also more constructive reactions, for example, AMA which

posed questions on how we should deal with these findings.
In January, GLOBAL 2000 was invited to hold a presentation on ED-pesticides and their risk to consumers during the “Wintertagung”, Austrias biggest annual agricultural convention.

Moving forward:
The same calculations, that made together with PAN Europe using European pesticide monitoring data (EFSA report 2009) are to be carried out using Austrian pesticide data (until recently we didn’t have this data) as part of our program/projects together with REWE group Austria (pesticide reduction program PRP and NHP). We also intend to hold regular meetings with farmers. We hope to make use of these meetings to discuss possibilities to remove certain ED-pesticides from the production of special crops. We intend to repeat our call for a phase out of all ED-pesticides from the IP-list, list of pesticides allowed in integrated production within the Austrian environmental program ÖPUL (Helmuth Burtscher, Global 2000).

School fruit scheme in Slovak Republic & pesticide residues

(Daniel Lešinský, CEPTA)

Under the EU supported SFS (School Fruit Scheme) run in Slovakia as in other member states, the Commission will refund up to 80% of the price of any fruit and vegetables which are offered to the children. The idea is good of course; we need to teach our children to eat healthy food – including fruits and vegetables, but, how healthy are the fruits consumed in the EU? Based on official European monitoring - about 50% of them contain pesticide residues, about 25% have traces of more than one kind of pesticide (multiple residues). Many residues are EDs (Endocrine disruptors), for which children are the most vulnerable. Maximum Residue Levels (MRL) are based on best agricultural practice, not human ecotoxicity like ADI (Accepted Daily Intake), or ARfD (Acute reference dose). Additionally, about 50% of MRLs in the EU are still in the wake of the 2008 harmonisation and do not reflect multiply residues in any single food we eat. So, in the Autumn of 2012 (7.11.2012), I made a proposal to the Fruit and Vegetable Advisory Group of the European Commission to take a new approach with regard to the school fruit scheme – the forward 0 residues SFS approach (see all presentation here: http://www.pan-europe.info/Activities/Presentations/PAN%20F&V%20and%20pesticides_FINALnew.pdf). The Commission has not yet responded.

National Action Plan Slovak Rep.

NAP SK – Slovak National Action Plan for „sustainable“ pesticides use was adopted without an understanding of what the partnership principle means in adopting strategic documents. The responsible person at the ministry did one on-line public consultation, followed by just one physical meeting of stakeholders. We were not able to see \ the final version of the document and were given no opportunity for discussion. In the working version, it was felt that the responsible person at the agriculture ministry have a lack of understanding for priorities of the directive and no understanding for the partnership principle approach. EU strategy as well as that of other member states would be instructive. The strategy would clearly define common targets in pesticides use, which could be evaluated. The NAP in such a case would then serve as it was intended. Otherwise, a good idea of a systematic approach in pesticides usage/dependence reduction by NAP will stay on paper, varying from country to country, with responsible officers using competitiveness as an argument against the safety of EU inhabitants, taxpayers, and the future.

(Daniel Lešinský, CEPTA)

Ban on pesticides in residential areas in NL?

Since summer 2011, I have represented PAN Europe in the Dutch working group for the National Action Plan regarding the non-agricultural use of pesticides. In the end, the working group decided to stop using pesticides on streets, parks and other residential green areas as well as for non-professional use. Only a minority of those selling the products were against the ban. Additionally, a study commissioned by the Dutch government showed that the use of non-chemical alternatives are not more expensive and the alternatives for keeping streets clean are only slightly more expensive. However when the National Action Plan (NAP) was published, it turned out that the use of pesticides in residential green areas on streets wouldn’t be banned at all. A 2011 parliamentatary resolution banning the use of Glyphosate was also ignored.

Since we noticed that the NAP of the government on many points didn’t meet the requirements of the Sustainable Use Directive, we started drafting an alternative plan. This alternative plan was one of the elements of the discussion in the Dutch parliament and with a new government, including Social-Democrats and Social-Democratic ministers, a new wind started blowing in the Netherlands. A resolution was adopted in November 2012 for a moratorium on the use of bee-killing neonicotinoides and as well other resolutions such as levies (taxes) for pesticides. The Netherlands moved from her traditional back-lagging position in Brussels, to a more progressive position supporting a ban. The new minister also asked for a revision of the NAP and there are some indications a ban in residential areas could be an outcome. (Kees Beaart, the Netherlands).

Go Organic! Many fruits and vegetables not safe for pregnant women and young children!

WECF Netherlands and PAN-Europe published the results of their study regarding hormone disrupting pesticide residues on fruits and vegetables as a press release just before Christmas. WECFs Margriet Samwel analysed the official residue data from the government, and the results were shocking, among others 90% of Dutch apples contained hormone disrupting pesticide residues. The press release warned - in light of the Christmas dinners - that pregnant women and children should avoid such EDC residues, and eat organic fruits and vegetables instead.

The press release generated a lot of traffic to the website (1450 extra unique visitors the first day) and various facebook pages and articles on the issue were published on over 20 popular websites, such as Babybegood.nl, Duurzaamnieuws.nl, GreenJump.nl, Motherbook.eu., and many others. We encountered a great deal of resonance via social media and from some papers and we gave a few radio interviews. A few journalists are considering further TV programs and articles later this spring (Chantal van den Bossche, WECF).

EU veterinary medicinal products Regulation.

Better protecting the environment from the adverse effects of veterinary medicinal products On the European level the revision of the European veterinary medicinal products regulation has started. A better protection of the environment has not been one of the main targets of the revision so far. PAN Germany - in exchange with NGOs working on related issues - is looking for possibilities to include more environmental protection in the authorisation process and to promote a more responsible use of veterinary medicine.

Considerable amounts of medicinal products used in animal breeding are released into the environment especially by intensive fattening operations. In the environment they contaminate surface and ground water, sediments and soil and have negative impacts e.g. on the well-being of aquatic communities.

PAN Germany informs in a new brochure on the current status of legal regulation in the realm of veterinary medicinal products, the goals of the revision, and the relevant administrative jurisdictions. Furthermore the publication discusses what improvements are needed from the perspective of environmental protection.

This includes
- the systematic collection and publication of data on commercial use of veterinary medicinal products
- to secure coherence with other relevant European regulations on specific substances, on the environment, on water protection, and on animal welfare,
- to strengthen environmental protection in the authorisation process e.g. by introducing a review programme for evaluating the environmental effects of veterinary pharmaceuticals that have been approved without being tested for their environmental impacts
- to promote a more conscious handling of animals and responsible use of veterinary medicine and
- a stricter regulation of the use of antimicrobials.

The brochure “Veterinary medicinal products and protection of the environment” is available in English and German: http://www.pan-germany.org/download/tierarzneimittel/tierarznei-EN-130207-web.pdf (Susan Haffmans, PAN Germany).

3. ENDOCRINE DISRUPTING CHEMICALS

Endocrine Disrupting Chemicals Training Session: 12 European NGOs meet in Vienna

At the beginning of October 2012, PAN Europe organized a training session for its members and partners in Global 2000's office in Vienna concerning Endocrine Disrupting Chemicals (EDCs). The issue is especially important now because the European Commission is scheduled propose final criteria for endocrine substances in December 2013. 14 representatives from 12 NGOs all over Europe came to this meeting: Bund (Germany), the Ecological Danish Council, the European Environmental Bureau, Friends of the Earth Bulgaria, Générations Futures (France), Global 2000 (Austria), Legambiente (Italy), the Social Environmental Institute (Poland), Vivosano (Spain), and WECF Netherlands. The goal of this meeting was to discuss on the next step in EDC lobbying both at the national and European levels and to provide scientific and communication expertise to various organisations with different backgrounds. PAN and other organizations gave input presentations as a base for our discussions. These included: What are EDCs? Decision making process overview and state of art; Lobbying, how and who should we target?; The examples of France and Denmark projects on the subject; Possible Communication tools; How to interest the Media?; and finally the Court cases brought by PAN and how to initiate one. These presentations were meant to be short in order to give participants time to discuss, share our experiences, and brainstorm. It was especially important for our EDCs campaign to meet in person with our various partners with whom we exchange very often by email.

PAN Europe will start a "healthy salad" campaign this year because every consumer has a right on endocrine-free food.

Consumer Guide distribution in Brussels: Belgian citizens and European technocrats

After having our Consumer Guide Disrupting Food translated in several languages (available on www.disruptingfood.info) and dissiminate around Europe via the internet, we decided that we should try to disseminate our guides in Brussels itself. Thanks to the help of our volunteer Ruta Kapre, we distributed the guide in some crucial city hubs. On one hand we wanted to target the European institutions, so we went to Place du Luxembourg, seat of the European Parliament and Schuman Square on the corner of Rue Froissart, close to both the European Commission and the DG Health and Consumers. It was interesting to see the people's reactions, often very interested. One could clearly say that there was a great deal of awareness of the issue. We also wanted to target the native Brussels population, especially families with young children who are the most vulnerable to Endocrines Disrupting Chemicals. We therefore went to both Flagey Market and Sainte Catherine Christmas Market on December 8th. Most of the people around, both Belgians and foreigners, were clearly worried about the quality of their food and wanted to have more information. All in all, it was a great experience for PAN which has done limited street action.

Media Links:

http://www.lemonde.fr/planete/article/2012/12/12/perturbateurs-endocriniens-bruxelles-se-dechire_1804965_3244.html

http://blogs.rue89.com/de-interet-conflit/2012/12/14/perturbateurs-endocriniens-lagence-europeenne-minee-par-les-conflits

http://www.lemonde.fr/planete/article/2012/12/05/fertilite-masculine-les-dangers-averes-des-perturbateurs-endocriniens_1800127_3244.html

http://www.ots.at/presseaussendung/OTS_20120817_OTS0033/global-2000-fordert-verbot-von-hormonell-wirksamen-pestiziden-durch-minister-berlakovich

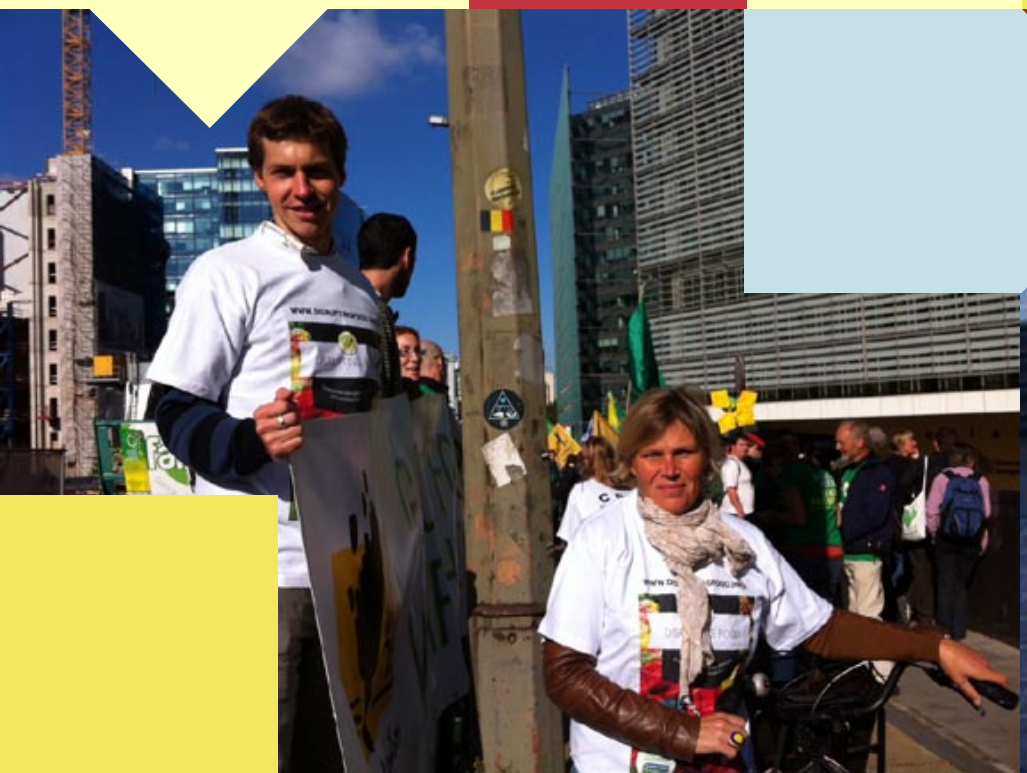
http://www.onmeda.es/noticias_salud/noticias/alimentos_como_la_lechuga_o_los_tomates_contienen_hasta_30_t%C3%B3xicos_diferentes-234.html

http://www.europeanvoice.com/article/imported/seed-treatment-poses-a-risk-to-europe-s-bee-population/76174.aspx

http://anh-europe.org/news/it%E2%80%99s-official-pesticides-are-killing-the-bees

http://chemicalwatch.com/11301/ngo-highlights-edc-residues-in-eu-fruits-vegetables

[Our campaigners, Martin and Henriette left and Ruta right].

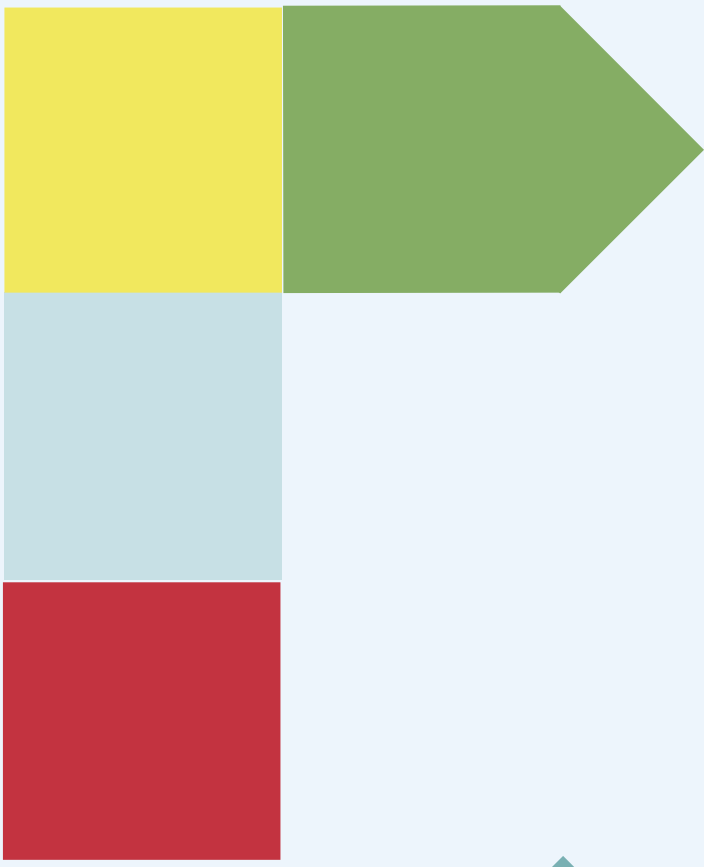


PAN Europe is on Facebook and soon on Twitter

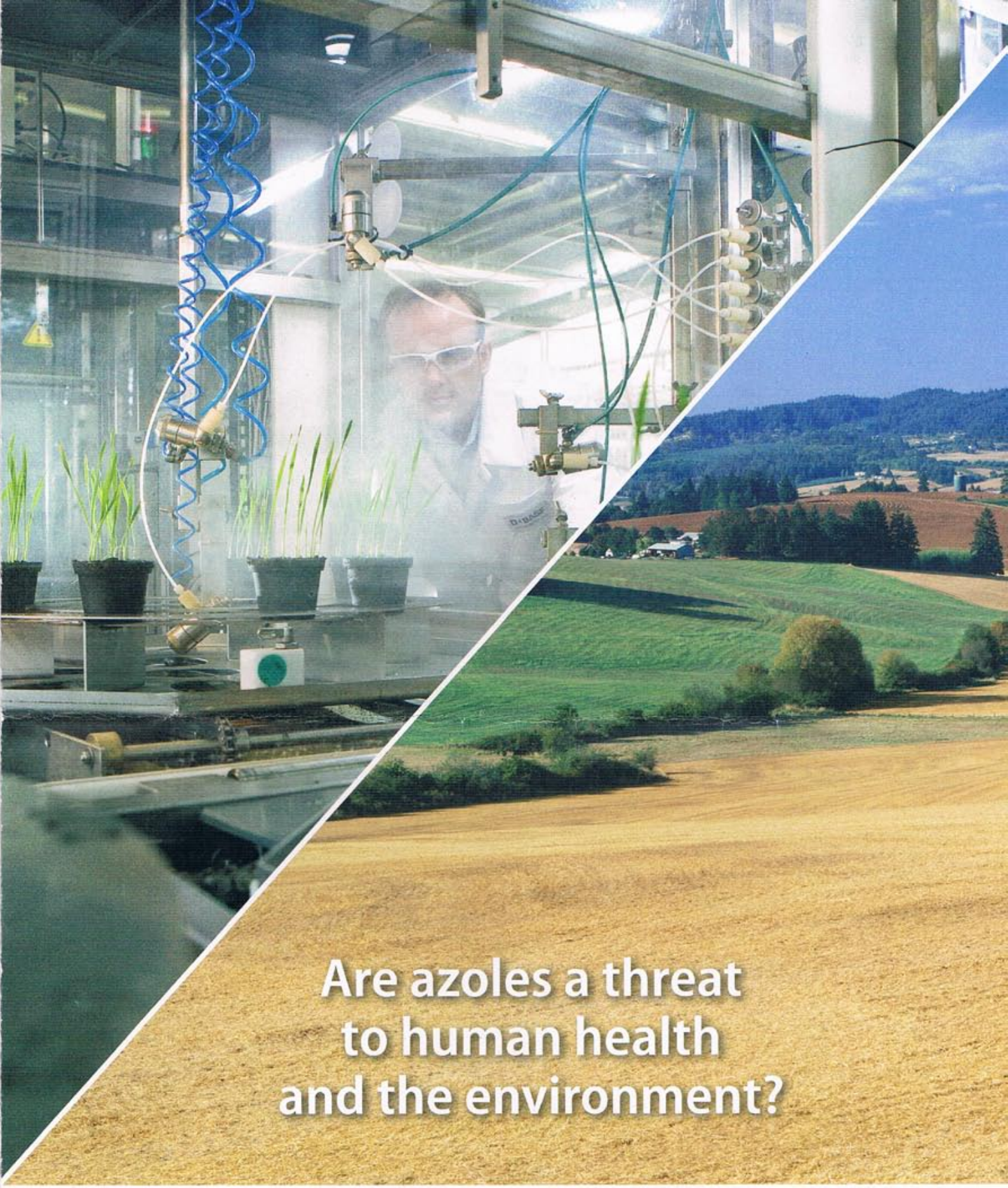
Launched in June 2012, PAN Europe now has a Facebook page. We now have 263 “likes” but depending on the subjects of our posts we sometimes reach over than 2000 people a week. The most popular subjects were the honeybee issue and the work on the Commission to ban the neonicotinoides that appear to be killing them. Of course we also use this page to promote PAN projects, reports, press releases, and petitions, but most importantly, it is a way to inform people about scientific literature and media article from all over Europe. People are thereby up to date about the evolution of issues such as Endocrine Disrupting Chemicals, the Bees disappearance probably caused by pesticides, the CAP 2013 reform, and more generally other environmental linked subjects that might interest people. Although the number of people that “like” our page is still growing, it is interesting to see that they are from all over the world, Europe of course but also USA, South America, and even India. In addition, in 2013, PAN decided to continue with this social networking wave and will start a Twitter feed in March in order to react in real time to the environmental issues that emerge everyday in Europe and on the Brussels scene, especially those related to pesticides.

BASF fears of a ban on endocrine disrupting azoles

German chemical company BASF produced a flyer trying to scare off politicians saying a ban of the endocrine disrupting azole pesticides is unnecessary because no harmful effects on humans have been found, and that a ban would cost 4,6 Billion Euro’s and force Europe to import wheat (Europe is currently a wheat exporter).



Our Facebook page:
http://www.facebook.com/pages/PAN-Europe-Pesticide-Action-Network/317276691687544



Are azoles a threat to human health and the environment?

BASF
The Chemical Company

ELO
European Landowners' Organization

4. AGRICULTURE AND NATIONAL ACTION PLANS

Illegal pesticides and the Common Agricultural Policy

Earlier this year, Danish national television found a large number of illegal pesticides on a number of Danish farms. The Danish administration reacted by attempting to recollect part of the CAP money back from the implicated farmers. Though, as there is no visual proof that the illegal pesticides in question where actual used in the fields (the inspectors did not see when the farmers actually sprayed and the cereals have already been sold), it seems to be illegal to claim the CAP payments back. Absurd no?

Pesticides, crop rotation, and the Common Agricultural Policy

Since 1999, there has been environmental requirements in the Common Agricultural Policy (CAP); the EU defines the overall objectives, while it is for member states to define details. In Brussels terms, a number of EU Regulations and EU Directives, known as the so-called statutory mandatory requirements as well as a set of Good Agricultural and Environmental Policy standards (GAEC), together are known as cross compliance.

First Directive 91/414/EC, now 1107/2009 Regulation is one of the 19 mandatory requirements that farmers needed to respect to obtain CAP funding. However farmers only need to respect certain articles of this regulation.
Currently, the Sustainable Use Directive (SUD) is still not part of the so-called cross compliance. Instead crop rotation, which is the key principle of Integrated Pest Management (IPM) defined in the SUD, is a GAEC requirement applied in only 18 Member States.

The European Commission's 2011 reform proposal, suggested introducing the SUD into cross compliance, not starting in 2014 as stated in the SUD, but starting from 'when it has been implemented by all member states'. As you all know, the proposal also also included the introduction of a green component, meaning that in order for farmers to obtain payments in the future, they would have to apply a simple agronomic package of practices consisting of crop diversification, ecological focus areas, and no tilling of pasture. This is in line with the basic principle of IPM, asking farmers to start taking a holistic approach to farming. Also, to give more weight to the green component, the GAEC requirements were proposed to be changes, among others, deleting crop rotation.

In principle, crop rotation is an indirect mandatory requirement in today's CAP, but with the reform, it risks becoming a voluntary requirement for farmers, to be supported under rural development. When the CAP reform was proposed in 2011, the environmental baseline had already been lowered.

Though, this new architecture of the CAP -putting agricultural practices up front – seemed to be positive, as it allowed us to speak about the basic principles of integrated production, the need to integrate nature into and around the field, diversification, crop rotation, cover crops, ecological focus areas, keeping pasture, etc. Definitely more interesting than the normal CAP debate, which was generally limited to technical terms like cross compliance, modulation, rural development, agri-environmental measures, etc.

The CAP reform is currently being discussed in the European Parliament and the European Council. While the battle is not over until it is over, the deal on the budget makes it very clear that concepts like budget cuts, cutting red tape, the financial crisis, are winning over the battle on sustainable development, with the result being that progress is again being pushed off the agenda, and we risk being left with 'money for nothing'.

Faustine Defossez from the EEB explains this in a very nice way in an interview to Euractiv : *"On the one hand, the Council and the Parliament are trying to exempt as many farms as possible, but on the other, those that are left will have to comply with an empty shell of a greening package"*

So once again the EU is being overruled by member states' interests, meaning that the original idea of finally putting agricultural practices up front, and make farmers more equal with the EU – and finally making EU citizens understand why we have a CAP, is being lost again.

It seems that we are instead back to the idea that the EU should set the overall outline, and the Member States should define specifics, which again – as in the case of chemical regulation – means that the door for loopholes and derogations remains is wide open. This is definitely not a good development for the big EU picture, definitely not a good thing the environment and public health in the EU, and is especially bad for EU farmers because EU citizens remain in the dark about the kinds of benefits that they are actually being delivered, which puts the long term financing of the CAP in danger.

Innovations and resource efficiency in the European agricultural sector

As part of Europe 2020, the EU's growth strategy for the coming decade, the European Commission has established a set of European Innovation Partnerships (EIPs) as a new approach to EU research and innovation. One of these EIPs will deal with agricultural productivity and sustainability.

PAN Europe is part of one of the 42 'high level representatives' in the steering committee, meant to develop a Strategic Implementation Plan that will give orientation and strategic advice to the EIP. While we do know that there is a risk these efforts will turn out to be just another piece of paper, we do feel that we should engage in the process in order to provide input on what kind of action is needed to ensure that EU farmers start seriously reducing their dependency on chemical inputs.

As a contribution to this debate on innovation and resource efficiency, we have prepared a set of factsheets. These can be found here:

http://www.pan-europe.info/Resources/Briefings/innovation%20and%20resource%20efficiency-1.pdf

Implementation of the Sustainable Use Directive – National Action Plans

By November 2012, member states should have had sent their National Action plans (NAPs) to the European Commission and other member states.

On 8 February, the European Commission posted the NAPs online: http://ec.europa.eu/food/plant/pesticides/sustainable_use_pesticides/national_action_plans_en.htm
It is still too early to say something about content, but here a little overview of which members have respected the deadline:
The NAPs in English already online: Netherlands, Slovenia, Czech Republic, Lithuania, Finland
The NAPs in national language are: Bulgaria, Cyprus, France, Hungary, Romania, Slovakia, Spain
Member States which still need to submit their NAPs include: Austria, Belgium, Denmark, Germany, Greece, Ireland, Italy, Latvia, Luxembourg, Poland, Portugal, Sweden and the United Kingdom

While some of the member states which still have not submitted their NAPs, including Denmark, Ireland, Germany, and Belgium, the plans are currently in public consultations and expected to be finalised and published in due course. Five Member States still have yet to adopt the Sustainable Use Directive into national law even though the legal deadline expired more than a year ago (November 2011).

The European Commission is the watchdog of the EU and it is therefore the Comissions role to make sure that member states implement EU Directives. In the case of the SUD, DG SANCO is currently in touch with member states, aiming to train civil servants in member states on the different aspects of the SUD, organizing meetings with and without stakeholders, analyse the content of the NAPs, ensure that the minimum requirements are fulfilled, and if necessary, take (legal) actions to make sure that they will be fulfilled.

But what are the minimum requirements?

Taking a first look at the SUD, it seem to be a paper tiger, especially because of the many 'where possible', 'if feasible' in the text. However, when reading carefully through the text, it becomes clear that the SUD is a real tiger, targeted at reducing pesticide dependency, with the following mandatory requirements:

- **member states shall give priority to non-chemical alternatives** *"Member states shall take all necessary measures to promote low pesticide-input pest management, giving wherever possible priority to non-chemical methods."*(Article 14), and:
- **Farmers need to implement Integrated Pest Management** from 2014: *"professional users of pesticides switch to practices and products with the lowest risk to human health and the environment among those available for the same pest problem."* (Article 14.1)
- Ensure that pesticide use is **minimised or prohibited in specific areas** (Article 12)
- Establishing **appropriately-sized buffer zone**s to protect non-target aquatic organisms and safeguard zones for surface and groundwater used for the abstraction of drinking water, where pesticides must not be used or stored (Article 11)

PAN Europe will continue to monitor developments to verify if member states are taking serious action to fulfil these requirements.

5. PESTICIDES

Still massive use of derogations by France, Portugal and Greece

In July 2012, PAN-Europe published a follow up report on the use of the “120 day derogation” (Article 53 of Regulation (EC) N0 1107/2009), that allows Member Sates to apply illegal pesticides for almost a crop season (120 days for an emergency when no viable alternatives are available). Despite a 30% decrease compared to previous years, 230 authorizations were granted for 127 substances during 2011 including extensions of use for other crops or products totally banned in Europe, as dichlorvos and dichloropropene. France, Portugal, and Greece remained the top granting countries with 32, 30, and 21 derogations each. PAN-Europe questioned the abusive use of this system by Member States without any oversight from the European Commission and urged the Commission to take a more active role in the process. Specifically the Commission was called upon to make the derogation system fully transparent and to force Member States to use existing alternatives.

Our report was echoed by the European Parliament and the media, particularly the situation of Portugal, the only country from the top 3, that did not show a clear reduction in the number of derogations granted. The Commission admitted to some misuse of Article 53 by Member States and announced that it was working on a guidance document to establish harmonized criteria concerning the evaluation and decision-making of this process and to define detailed information to notify the Commission and other MS about. In October 2012, PAN-Europe was invited to comment on a draft version of the guidance document. In the draft, the EC introduced a higher level of control on the derogation process, but many questions have still been left open.

Bats at risk from pesticide exposure

Researchers from the University of Koblenz-Landau[1] have warned that bats are at a greater risk of pesticide exposure than had previously been suspected. The researchers said that bats may consume insects sprayed with damaging chemicals, and that due to their long lifespan and low birth rates, bats are particularly susceptible to adverse effects on reproduction caused by pesticides. The scientists studied bats foraging for insects in an apple orchard which had been sprayed with Fenoxycarb and Chlorpyrifos insecticides.

Not only did they discover that bats feeding on tree dwelling insects are at risk of pesticide exposure, the researchers found that the current European Union risk assessments did not adequately consider the animals when reviewing the safety of agricultural chemicals. The discovery comes just months after the European Food Safety Authority acknowledged that current pesticide testing does not provide adequate protection for insect pollinators.

In addition to their iconic status as the only flying mammals, bats are important pollinators and naturally regulate insect populations.

The researchers concluded that, as bats can be exposed to chemicals through their diet as well as through drift and inhalation and the effects of exposure can be cumulative and severe for bat colonies, immediate action must be taken to include considerations of bat species in agricultural chemical trials.

1. Stahlschmidt P, Brühl CA., Environ Toxicol Chem. 2012 Jul;31(7):1556-63. doi: 10.1002/etc.1834. Epub 2012 May 9.

Official Review of dangerous nerve poison Chlorpyrifos

In 2012, EU Health Commissioner John Dalli decided to start a review of the approval of pesticide Chlorpyrifos after years of accumulated evidence of harm. This was announced in a letter to PAN Europe by Dalli's head-of-cabinet, Mrs. Darmanin. It is one of the first-ever cases of approved pesticides being reviewed because of new concerns. Chlorpyrifos is an insecticide used on grapes and potatoes and was provisionally approved in 2006. However, the conditions for approval –to show in 2-years time that the risks for birds and mammals are acceptable- have not been fulfilled. Further, independent scientists have continued to present strong evidence of harm to humans. New evidence from the USA[2 3] shows brain damage in children exposed to Chlorpyrifos at everyday exposure levels, the effects being more irreversible for young girls than boys. This new evidence only strengthens the available evidence of harm and shows the present EU standards are irresponsibly high. Additionally to that, Chlorpyrifos is a persistent and bioaccumulative chemical, it is travels long distances and is shown to be present almost everywhere in the environment, in food and air, even in the Arctic[4] , in ice, snow, fog, air, seawater, lake sediment, fish and vegetation. PAN Europe has send letters to Mr. Dalli presenting the scientific evidence on 07-06-2011 and 13-09-2012 and now Dalli finally has taken responsibility to protect citizens and the environment and starts the review. PAN Europe has urged Mr. Dalli to choose for a full ban since it is the only way to prevent further damage being done. Based on a yet to be released EFSA opinion, the Commission needs make proposals again to the Standing Committee in early 2013.

(picture below showing DOW Chemicals collecting signatures from farmers in 2012 for a petition against a ban on Chlorpyrifos)

2 Virginia A. Rauh, Frederica P. Perera, Megan K. Horton, Robin M. Whyatt, Ravi Bansal, Xuejun Hao, Jun Liu, Dana Boyd Barr, Theodore A. Slotkin, and Bradley S. Peterson, Brain anomalies in children exposed prenatally to a common organophosphate pesticide, PNAS | May 15, 2012 | vol. 109 | no. 20 | 7871–7876

3 Megan K. Horton, Linda G. Kahn, Frederica Perera, Dana Boyd Barr, Virginia Rauh, Does the home environment and the sex of the child modify the adverse effects of 2 prenatal exposure to chlorpyrifos on child working memory?, Neurotoxicology and Teratology 2012; DOI: 10.1016/j.ntt.2012.07.004

4. Chlorpyrifos as a possible global POP, Meriel Watts, PhD, For Pesticide Action Network North America, August 2012

10 years EFSA - 10 years of blind love for industry

Food Authority EFSA celebrated its 10th year anniversary in November 2012, but according to PAN Europe there is not much to celebrate. EFSA has a track record of working closely with industry and with industry-linked people who claim to be an independent scientist. The EFSA too readily embraces industry ideas, while forgetting about their mission to protect people and the environment. Below are a few examples illustrating the 10 years 'lost' by EFSA during which it could have worked to improve human health and the environment. There however is a glimmer of hope for the next 10 years, as illustrated by the recent EFSA-opinion on bees.

• EFSA organised a range of 'scientific' colloquiums' -generally organised with the industry lobby club ILSI (International Life Science Institute)- crowded with industry people and crowded with industry-linked people, while civil society was excluded. Cases include the 2005-colloquium on genotoxic carcinogens , the 2006-colloquium on pesticide mixtures and the 2011-joint EFSA/ILSI/CEFIC-workshop on TTC , an industry-tool to classify chemicals as 'safe' without testing. Many of the industry-linked people present served in the EFSA-panels and illustrate the cosy relations.

• While politicians decided to oblige regulators such as EFSA to take into account independent scientific work published in scientific journals, EFSA managed to write a Guideline[8] effectively excluding independent science by using the so-called "Klimisch-ranking". H.J. Klimisch is an employee of BASF claiming that industry-sponsored studies should be preferred over studies done in independent laboratories. EFSA themselves showed very clearly their bias on independent literature dismissing all 700 independent studies on the chemical Bisphenol A while continuing to base their conclusions on 4 industry-sponsored studies.

• One of the clearest cases of a conflict of interest was EFSAs work on TTC (Threshold of Toxicological Concern). Industry consultant Susan Barlow volunteered to chair the working group and invited her network of industry people to join her. 10 out of 13 members of the TTC-wg. were people promoting the use of TTC in the past -generally together with ILSI- and still were supposed to perform an independent assessment. 8 out of 13 had formal relations with industry group ILSI[9] .

• It is not only TTC which has been embraced by EFSA, but many industry-proposals and loopholes were adopted with help of the industry-linked in the EFSA-panels. On multiple occasions, harmful effects demonstrated in animal studies were dismissed and considered "irrelevant' for humans, controls in animal studies were not used and substituted by statistical methods allowing harmful effects, toxic pesticide breakdown products were classified as 'non-relevant', and wild plants and animals allowed to be killed by pesticides if they would return after one full year (called "recovery")

• So is EFSA not fulfilling its role at all? No, not entirely, a good inspiration for the next 10 year EFSA is the opinion on bees[10] where academic research was taken into account. This, however remains an all too lonely exception.

8. Submission of scientific peer-reviewed open literature for the approval of pesticide active substances under Regulation (EC) No 1107/2009, EFSA Journal 2011;9(2):2092
9. A toxic mixture, Industry bias found in EFSA working group on risk assessment of toxic chemicals, PAN E report on TTC.
10. Scientific Opinion on the science behind the development of a risk assessment of Plant Protection Products on bees (Apis mellifera, Bombus spp. and solitary bees), EFSA Journal 2012;10(5):2668

GM-crops increase the use of pesticides in the US.

Contrary to often-repeated claims that today's genetically-engineered crops have, and are reducing pesticide use, the spread of glyphosate-resistant weeds in herbicide-resistant weed management systems has brought about substantial increases in the number and volume of herbicides applied. If new genetically engineered forms of corn and soybeans tolerant of 2,4-D are approved, the volume of 2,4-D sprayed could drive herbicide usage upward by anotherapproximate 50%. The magnitude of increases in herbicide use on herbicide-resistant hectares has dwarfed the reduction in insecticide use on Bt crops over the past 16 years, and will continue to do so for the foreseeable future.

Herbicide-resistant crop technology has led to a 239 million kilogram (527 million pound)[11] increase in herbicide use in the United States between 1996 and 2011, while Bt crops have reduced insecticide applications by 56 million kilograms (123 million pounds). Overall, pesticide use increased by an estimated 183 million kg's (404 million pounds), or about 7%.

11. Charles M Benbrook, Environmental Sciences Europe 2012, 24:24

Silent Spring close to reality.

Rachel Carson's famous book 'The Silent Spring' starts with 'a fable of tomorrow', picturing "a town in the heart of America where all life seems to live in harmony with its surroundings". "Along the roads laurel, viburnum, and alder, great ferns and wild flowers delighted the traveller's eyes…….". But "then a strange blight crept over the area and everything began to change. Some evil spell had settled in the community……..everywhere was a shadow of death".

In our lifetime, we have been witnessing the fable become reality. Frogs and bats are poisoned by pesticides and dying of mysterious fungal infections, birds populations are decreasing at an alarming rate, even abundant birds seen in the fields like skylarks are threatened with extinction. Bees are dying. And what about us humans? Can you believe children are more sick now than a generation before?

In a landmark study of 12 national scientific institutes of work done in 8 West and East-European countries (Basic and Applied Ecology 11 (2010) 97–105), lead author Flavia Geiger and colleagues studied the effects of agricultural intensification. Loss of landscape elements, enlarged farms and fields sizes and larger inputs of fertilizers and pesticides have all taken their toll. Many wild plants and animals have gone extinct regionally or nationally and the potential to use biological control in agriculture has been reduced because beneficial insects have also been killed. Flavia Geiger and colleagues looked at 13 components of intensification in agriculture and the clearest relation with the decrease of biodiversity was the use of pesticides. The use of insecticides and fungicides in particular had consistent negative effects on biodiversity.

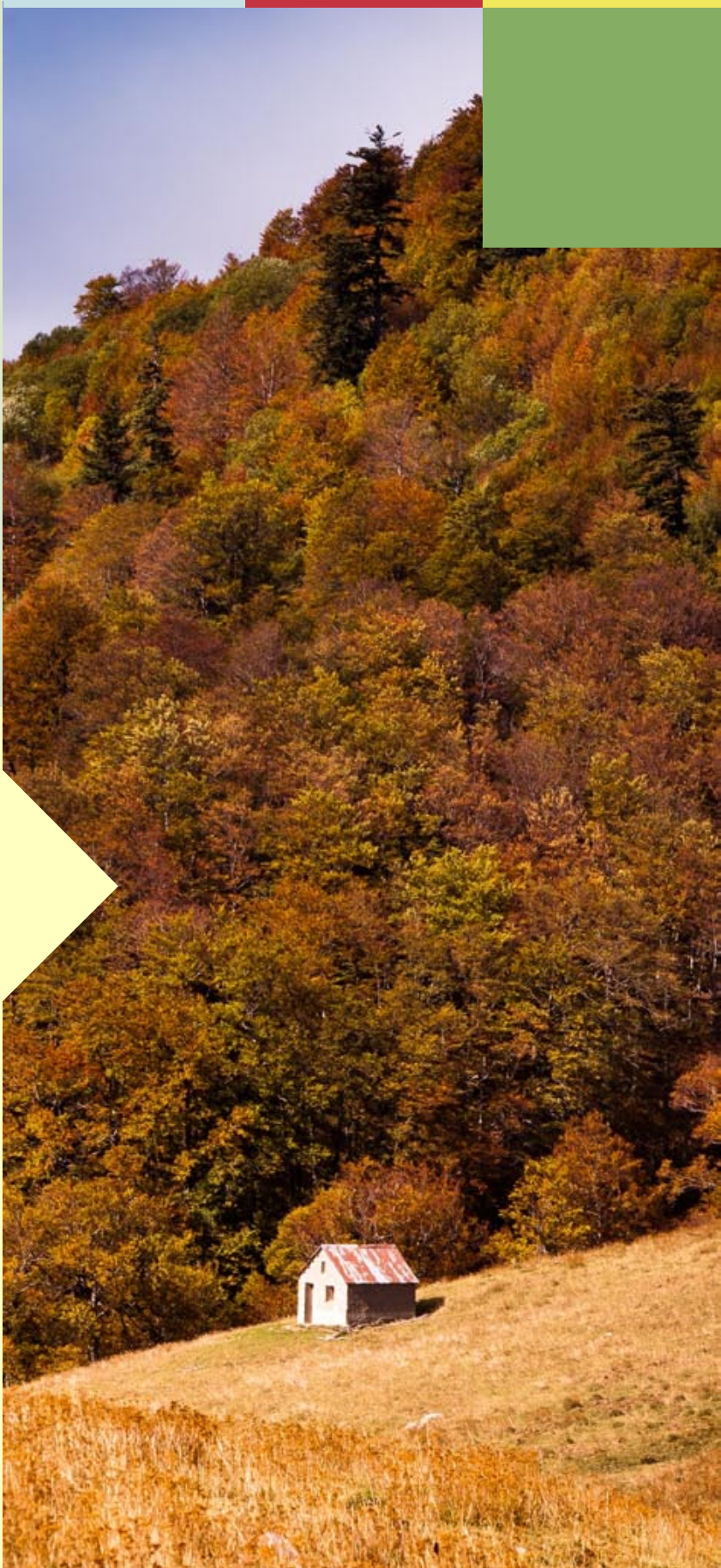
The European Union has had strict regulations on pesticides to protect human health and the environment since 1991, and this protection should prevail over the interests of crop production. One might ask why this regulation is so ineffective in protecting wildlife in Europe. This brings us to the Brussels arena where white could be white but also just as easily be black. The strict regulation to protect wildlife can be watered down by the Commission and member states in a procedure called 'comitology'. In this procedure, the Commission and EU member states (represented by their Ministries of Agriculture) are capable of twisting and turning the rules behind closed doors. The outcome is generally very positive for industry and farmers but not for the environment. Dozens of pesticides show a "high risk" for birds or for mammals or for bees, but often, the Commission and Member States decide to approve the pesticide. PAN-Europe recently published a report on 88 pesticides evaluated in a special procedure called 'resubmission'(PAN report on resubmission). This report clearly shows that is not a single case where a pesticide was banned for environmental reasons, while many were very harmful to wildlife. The official argument by Health DG SANCO is that Member states need to impose mitigation measures to protect wildlife, but it is totally unaware if this is the case, and if so, if the measures are enforced at all.

Rachel Carson was right, we are destroying our world. All the beautiful plants and animals are disappearing forever. The EU has high standards for protecting wildlife, but as it comes to decision-making, the rules are bent towards the interest of companies and wildlife is 'forgotten'.

6. PAN EUROPE COURT CASES

Glyphosate

PAN-Europe and Greenpeace started three court cases on the extension of the EU approval of Glyphosate, thereby requesting the disclosure of documents including the original industry studies. In the first case, the Commission denied us access to court and referred us to Germany for the documents because Commission claimed they did't have them. Nevertheless we appealed to European Court of Justice in Luxembourg. In the second case, we asked Germany the documentation. The Germans claimed the documents are confidential and we had no right to read them. We went to court in Braunschweig, and this court too felt that industry's interest should prevail over the public interest. We are considering an appeal. The third case is on a concrete authorisation in the Netherlands and a court meeting is pending.



Endocrine disrupting pesticides

PAN Europe and generation Futures brought the first court case on the fungicide prochloraz which was approved in 2011 while no assessment was made by Commission on its endocrine disrupting properties. Not regarding human health nor regarding the environment. A similar case has been started on the insecticide Bifenthrin together with ClientEarth and Generations Futures. On both occasions Commission denied us access to court and refused to comment on content. It will take some time not for Luxembourg court to decide and hopefully conclude to a court meeting.

Complaints at the European Ombudsman

In late 2011, a PAN Europe complaint was filed on the TTC work of the Food Authority EFSA[12]. 10 out of 13 people who had been developing, promoting and publishing on TTC in the past, generally with industry lobby clubs, were part of an EFSA working group and supposed to do an independent assessment. EFSA had its say on the complaint of PAN Europe. We could give again our observations but Ombudsman has still not made a verdict .

A second complaint was filed by PAN Europe in late 2012 regarding the Resubmission programme of DG SANCO[13]. On dozens of occasions, pesticides showed high risk for birds, for mammals, for bees, for water organisms, and in no case was a pesticide was banned. This means the pesticide Regulation has been violated and pesticides will continue destroying biodiversity.

Landmark case on access to court

PAN Europe, together with Natuur en Milieu (NL) brought a suit regarding massive food standard relaxing for pesticide residues in 2008. The Commission claimed we had no right to go to court but the Luxembourg court concluded that the Commission was wrong in 2012. While the verdict was quite clear, the Commission decided to an appeal. Both NGO's now face again a journey to Luxembourg to defend the outcome in 2012. The outcome of the appeal will not be known before 2014. Next to the victory in 2012, the Commission now –for the very first time- had to do a review for the case on relaxing standards since their appeal doesn't count for this case, and completely denied all of our claims. This means we have to challenge this Commission decision in the European Court of Justice– a case on content together with Natuur en Milieu.

Pilot cases on neo-nicotinoides

PAN Europe brought two cases on pesticides harmful to bees in the Netherlands, given the easy access to court in that country (access to court is easily granted, no lawyer needed). In 2011, a case was brought on all authorisations of Imidacloprid. The Dutch authorisation body was very slow in reacting and we decided to go directly to court. In early 2013, there will be a court hearing. A second case was on Fipronil (trademark Mundial), which is still ongoing.

12. PAN report on TTC
13. PAN report on resubmission

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