



Contribution to the EU Consultation on the Farm to Fork Strategy

“If biodiversity is to be restored in Europe and opportunities are to be created for crop production utilizing 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”

(Geiger, F. et al. 2010)

How to effectively reduce pesticide dependency in the EU

This position paper takes stock of the emphasis that EU-Commission President Ursula von der Leyen has put on reducing pesticide dependency and encouraging the uptake of non-chemical alternatives in her mission letters to the incoming commissioners for health, environment and agriculture and rural development, as well as in the written and oral exchanges with the Members of the European Parliament, and finally in the European Green Deal.

With this background, we wish to present to you our considerations and proposals on what significantly reducing pesticide dependency entails and what it will take to make it happen.

1. The European Green Deal on pesticides

The European Green Deal (EGD) explicitly targets pesticides. In relation to the Farm to Fork communication, the EGD states: *‘The strategic plans will need to reflect an increased level of ambition to reduce significantly the use and risk of chemical pesticides, as well as the use of fertilisers and antibiotics. The Commission will identify the measures, including legislative, needed to bring about these reductions based on a stakeholder dialogue. The area under organic farming will also need to increase in Europe. The EU needs to develop innovative ways to protect harvests from pests and diseases and to consider the potential role of new innovative techniques to improve the sustainability of the food system, while ensuring that they are safe.’*

The EGD identifies the following actions in relation to greening the Common Agricultural Policy/Farm to Fork’ Strategy: *‘Measures, including legislative, to significantly reduce the use and risk of chemical pesticides, as well as the use of fertilizers and antibiotics’.*

However, both the Zero-Pollution Ambition for a Toxic-Free Environment (whose aim is to “better monitor, report, prevent and remedy pollution from air, water, soil, and consumer products”¹) and the Biodiversity Strategy (which is planned to include *‘Measures to address the main drivers of biodiversity loss by 2021’*) must include specific work on pesticides. In reality, this means fully involving the European Commission services that can best contribute to ensuring the development of a holistic approach, as highlighted several times in the EGD.

In the following paragraphs we lay down our position on legislative changes needed to achieve EGD objectives on pesticides:

¹ https://ec.europa.eu/info/sites/info/files/european-green-deal-communication_en.pdf

2. European Commission and Member States must fully implement current pesticide laws

The topic of pesticide use reduction is not new. Article 4 from Directive 2009/128/EC (SUDP) whose aim is to achieve a sustainable use of pesticides in the EU states: *”Member states shall adopt National Action Plans to set up their quantitative objectives, targets, measures and timetables to reduce risks and impacts of pesticide use on human health and the environment and to encourage the development and introduction of integrated pest management and of alternative approaches and techniques in order to reduce dependency on the use of pesticides”*.

However, Member States have made disappointingly little progress when it comes to implementing the SUDP as well as the pesticide regulation 1107/2009 and the statistics of pesticides regulation 1185/2009, as already mentioned in several reports from the European Commission, European Court of Editors (Special report)² and from PAN Europe³. Commission needs to set clear mandatory targets within SUDP in order to reach the objectives of the EGD.

3. Legislative changes need to align with the EGD objectives on moving towards a pesticide-free EU

The EGD calls *‘to significantly reduce the use and risk of chemical pesticides, as well as the use of fertilizers and antibiotics’*, **underlining that legislative changes will be needed**. From a pesticide perspective, following legislative actions are needed:

- a) **Ensure a proper implementation of EU Regulation No 1107/2009 on authorisation of plant protection products, starting with**
 - Limiting ‘emergency use’ derogations to real ‘emergency’ situation (a recent access to documents showed that in 2018 no less than 518 derogations were given)
 - Oblige Member States to start delivering the mandatory comparative risk assessment for all candidates for substitution and proceed with their ban or substantial restriction (Art 50)
 - Use Commission’s screening exercise on Impact Assessment for Endocrine Disruptors, trigger Article 21 to assess and ban all substances identified as known endocrine disruptors and are still in the market (25 active substances)
 - Ensuring an independent, objective and transparent scientific risk assessment of active substances and pesticide products
 - Fully apply the precautionary principle in pesticide risk assessment, when uncertainty persists as well as when an active substance is categorised as a ‘cut-off’ substance, adopt provisional risk manager measures at EU and Member States level (ban or substantial restriction)
 - Ban on glyphosate in the 2022-revision under Art 4
 - Implement transparent and coherent post-approval monitoring following the use of pesticide products to assess real life impacts. Monitoring costs should be borne by applicants and results should trigger rapid revisions of the dossiers

² <https://www.eca.europa.eu/en/Pages/DocItem.aspx?did=53001>

³ <https://www.pan-europe.info/eu-legislation/directive-sustainable-use-pesticides>

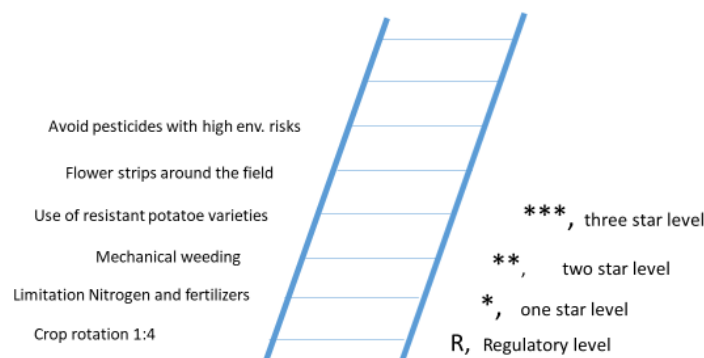
b) **Reinforce the implementation of SUDP objectives starting with:**

- Setting mandatory quantitative use reduction targets with clear timetables in article 4, with each Member State reporting progress and milestones. **PAN Europe proposes a reduction in synthetic pesticide use dependency of 50% by 2025, to reach 80% by 2030, aiming to reach a full phase-out by 2035.**
- Obliging Member States to apply the mandatory integrated pest management (IPM) and ensure the uptake of non-chemical alternatives (article 14)
- Several options exist to trigger pesticide use reduction, e.g. by including reduction targets into cross-compliance from the CAP, by transforming the SUD into a regulation, by developing a new legislation or by introducing pesticide taxations in line with what is mentioned in recital 4 of the SUDP
- Highlighting what is not IPM. This would mean banning high impact and preventative chemical methods, such as soil fumigations, seed treatment and ‘cosmetic’ use of pesticides. “New genomic techniques” must not be considered IPM and should stay regulated under EU directive 2001/18 to ensure a proper risk assessment, labelling and post-market monitoring
- To ensure a major impact to health and the environment start with major agricultural production in EU (see example in Box1).
- Facilitating knowledge exchange and transmission, establish public extension services for training and advise on nature-based agronomic practices. Building on the positive experience in a number of Member States⁴ to introduce an EU-ban on the use of pesticides in public areas (parks, playgrounds, schools, golf courses, cemeteries), in private gardens and for non-professional use.

Box 1. Development of IPM method in potato growing in the EU

A crop-rotation of 5 years will be made mandatory (part of ‘cross-compliance’). A next step will make mechanical weeding mandatory, gradually phasing out herbicides. A next step will be a limitation of fertilizers that will reduce the use of insecticides. A next step will oblige the use of only resistant varieties of potatoes, gradually phasing out fungicides, etc. (see graph on the IPM-ladder). It is a step-wise approach that enables all farmers to learn and experience, while front-runners show the way. Every farmer needs to make a first mandatory step on the ladder (regulatory obligation), and front-runners can put one or more next steps towards implementing IPM and sustainability and get financially rewarded. Over the years, additional steps are made on the ladder and regulatory mandatory steps added. We envision that the system can be applied EU-wide, and only needs marginal adaption in climate zones.

**The ladder for crop-wise implementation of Integrated Pest management
Example Potatoes.**



So far, Member States have been developing National Action Plans (NAPs) to show compliance with the SUDP by highlighting the measures they take within other EU policies, like the water framework directive, within the CAP. PAN Europe emphasises that it is now time to give importance to the SUDP and its implementation and NAPs should contain new ambitious measures.

c) Update the CAP reform proposals giving attention to the phasing-out of pesticides over time

The EGD specifies that each CAP strategic plan needs to set significant reduction targets. Recital (35) of the EU Regulation No. 1107/2009 also says: *“The Council should include in the statutory management requirement referred to in Annex III to Council Regulation (EC) No 1782/2003 of 29 September 2003 establishing common rules for direct support schemes under the common agricultural policy and establishing certain support schemes for farmers, the principles of integrated pest management, including good plant protection practice and non-chemical methods of plant protection and pest and crop management.*

To achieve its EGD objectives PAN Europe calls on the European Commission to upgrade the CAP reform proposal, starting with upgrading the conditionality as follows:

- Good Agronomic and Environmental Practices (GAEC 8) to specify that ‘crop rotation’ is intended as a 5-year crop rotation with leguminous crops and should not be replaced by practices considered as “equivalent” as proposed by the Council;
- Statutory Mandatory Requirements (SMR) to include article 14 of the SUDP or article 55 of the EU Regulation No 1107/2009 specifying that farmers must apply Integrated Pest Management (IPM), meaning a combination of agronomic practices as mentioned in the annex of the SUDP, always giving priority to non-chemical alternatives
- SMRs to make it mandatory for farmers to inform national authorities about real use data, building on article 67 of Regulation (EC) no 1107/2009, see point 3.

For more details, see also PAN Europe position papers⁵.

PAN Europe calls on the European Commission to set a 50% EU-wide pesticide reduction target by 2025 in the Farm to Fork strategy, as well as an 80% EU-wide reduction target in the biodiversity strategy by 2030, while making it mandatory for all CAP strategic plans to include an analysis on which pesticide groups to phase-out first by crop.

PAN Europe calls on the European Commission to update the Annual Impact Indicator (I.27) on pesticides and the Annual Result Indicator (R.37) to be measured as a share of agricultural land where farmers engage in three different scenarios of serious pesticide use reduction:

- Farmers engaging in 50% use reduction over a three-year period

⁵ <https://www.low-impact-farming.info/sites/default/files/2019-05/cap-inspiration-3.pdf>

- Farmers engaging in a 100% use reduction over a three-year period, and
- Farmers in certified organic agriculture.

The CAP must be used as an incentive to stimulate sustainable agriculture. Economic incentives should be spent on those farmers that adopt sustainable practices, for example implementing additional steps of IPM (see 3-star proposal in Box 1) and increasing biodiversity in the field. When drafting their CAP Strategic Plans, Member-States must include and dedicate an adequate part of their allocated budget to eco-schemes and agri-environmental measures that will incentivize farmers to apply agro-ecological practices allowing significant pesticides use reductions to happen. This horizontal approach will take into consideration compliance of agriculture with Habitats Directive (Natura 2000 areas), Water Framework Directive, Birds Directive and EU Biodiversity Strategy.

Box 2. Indicators to be implemented in the current CAP proposal:

Output sub-indicators under O13:

- *Number of hectares managed by conventional farmers under commitment to reduce pesticide use by at least 50% over a three-year period**
- *Number of hectares managed by conventional farmers under commitment to go pesticide free over a three-year period (in conversion to organic/agroecology), and*
- *Number of hectares certified organic*

**This indicator could be weighted depending on where these areas are, close to water, close to nature, close to residents, close to organic farmers.*

Result indicator R37 measuring progress in pesticide dependency reduction at the end of the seven-year period:

- *Share of agricultural area grown under commitment to reduce pesticide use by 100%*
- *Share of agricultural area under commitment to reduce pesticide use by at least 50%*
- *Share of agricultural areas certified organic*

Impact indicator should measure the actual amounts of pesticides used in the Member State for the period 2021-2027.

d) From harmonised risk indicators to real pesticide indicators

Discussions around pesticide use in the EU have been focusing on reducing ‘risk and impact’ rather than on reducing dependency, all while encouraging the uptake of non-chemical alternatives.

The European Commission has recently released the first trend in the EU harmonised risk indicator (HRIs)⁶ as foreseen in article 15.4 of the SUDP⁷. This shows a slight reduction in the period 2011-2017, but as annual pesticide sales have remained unchanged at around

⁶ https://ec.europa.eu/food/plant/pesticides/sustainable_use_pesticides/harmonised-risk-indicators/trends-hri-eu_en

⁷ https://ec.europa.eu/food/plant/pesticides/sustainable_use_pesticides/harmonised-risk-indicators_en

400,000 tonnes of active substance, with use even increasing in a major country like France by no less than 21% between 2017 and 2018⁸, it is becoming evident that this approach is not an adequate indicator of pesticide use reduction and does not reflect the real risk.

HRI must be urgently updated, as already mentioned in PAN Europe's position paper on this matter⁹, as follows:

- Upgrading of the HRI1 to also include environmental exposure
 - Upgrading of the HRI2 to also include quantities, in order to monitor to what extent drops in HRI1 indicators linked to non-approval of an active substance are actually withdrawn from the market
- e) **The development of an indicator based on the use of pesticides in countries and specific crops is urgently needed.**

Farmers are obliged to register their pesticide use under article 67 of Regulation (EC) No 1107/2009 on the authorisation of pesticides, while according to article 15.2 of the SUDP, Member States are obliged to publish use statistics. Furthermore, Regulation (EC) No 1185/2009 on statistics on pesticides says in recital 6 that *'statistics need to be detailed up to the level of the active substances'*, while recital 7 mentions *'mandatory data collection was recommended as the best option because it would allow the development of accurate and reliable data on the placing on the market and use of pesticides quickly and cost-efficiently'*.

The European commission's own [REPORT](#) from 2017 on the implementation of Regulation (EC) No 1185/2009 already mentioned how to proceed by stating, among others: *'The Commission considers it equally important to adapt further the legislation on pesticides use statistics to ensure a more consistent approach and coverage across the Member States. This could include specified common reference periods and clear coverage requirements for the crops to be surveyed. The coverage rules could be based on the crop production statistics (a certain percentage of arable and permanent crops could be covered) and on analyses of the potential risks to the environment and human health, based on the sales of active substances. These rules would be set up in close collaboration between the relevant Commission's services and agencies and with national experts'*. It is PAN Europe's opinion that implementation of the Statistics Regulation is urgent.

Although it is beyond the power of the European Commission to define how the data collection should be carried out by EU Member States, it is crucial that it works with Member States to:

- obtain product-specific use data, starting from the main crops
- find technical solutions to protect sales confidentiality
- make information on the use of products publicly available

Such an ambitious approach is absolutely essential for the future of agriculture, health and the environment. It will benefit farmers' long-term stability, will reduce the impact of pesticides on biodiversity and human wellbeing, and in parallel will give to European citizens the pesticide-free Europe they are asking for.

⁸ https://www.generations-futures.fr/wp-content/uploads/2020/01/ecophyto_note_de_suivi_2018-2019_vdef.pdf

⁹ https://www.pan-europe.info/sites/pan-europe.info/files/publication%20of%20HRI%20MD_EM.pdf

The reality on the ground of many organic farmers proves this is feasible¹⁰. As such, we ask that EU financial tools be directed towards establishing such an ecological transition and accompanying the necessary stepwise change.

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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¹⁰ <https://www.low-impact-farming.info/>