



Factsheet: Which indicators to best measure the EU objective of pesticide use and risk reductions

February 2021

As part of the European Green Deal's strategies (Farm to Fork and Biodiversity), the European Commission is proposing to reduce pesticide risk and use by 50% by 2030. While PAN Europe fully backs the Commission in setting reduction targets for pesticides, we completely disagree with the indicator that the European Commission is proposing to measure this reduction. In the following we explain why.

1. The current indicator is based on pesticide risk, rather than use of pesticides

According to the EU law on Sustainable Use of Pesticides, more precisely in Article 15 of Directive 2009/128/EC, the European Commission is obliged to calculate Harmonised Risk Indicators at Community level.

Since 2019, the European Union has two indicators for this purpose:

- Harmonised Risk Indicator 1 (HRI1) - based on data on **pesticide sales** reported to the Commission by Member States,
- Harmonised Risk Indicator 2 (HRI2) - based on **the number** of emergency authorisations reported to the Commission by Member States.

The indicators are calculated using the methodology laid down in Annex IV of Directive 2009/128/EC, and in 2018, the European Commission published the trend results.

On its homepage, the European Commission's DG SANTE commits to developing more sophisticated indicators. In line with this commitment, the Court of Auditors' report on pesticide use states the need to *'improve statistics on pesticides when revising the legislation to make them more accessible, useful and comparable; and assess the progress made towards policy objectives, improve the harmonised risk indicators, or develop new ones, taking account of the use of pesticides.'*

2. Farm to Fork perpetuates the problem by maintaining the risk indicator criteria - at least until 2030

The European Commission writes in the question and answer session accompanying the Farm to Fork Strategy, that *'the Commission will develop further indicators and propose changes to the 2009 Regulation concerning statistics on pesticides.'* However, what they forgot to mention is new indicators are only foreseen to be introduced after 2030!

In July 2020, in an internal mail, PAN Europe asked the European Commission further details about the actual indicators: the Commission's reply was that the following two indicators had been chosen:

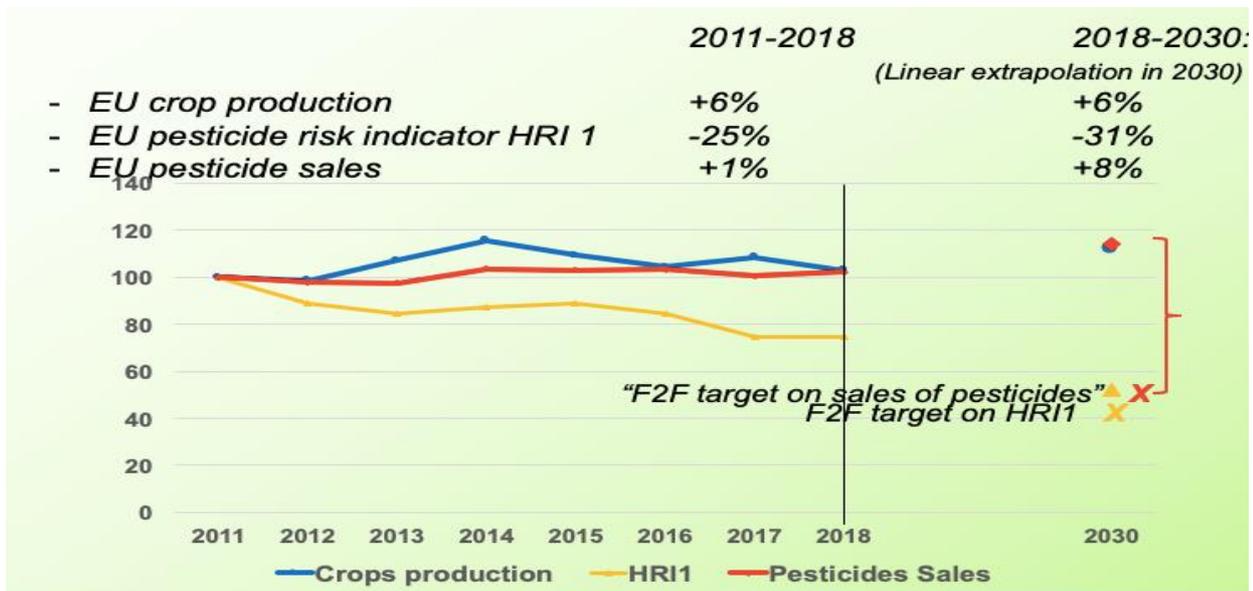
- Concerning the use and risk of chemical pesticides, the 50% reduction target, will be measured using Harmonised Risk Indicator 1 of Directive 2009/128/EC.
- Concerning the use of the more hazardous pesticides, the 50% reduction target, will be measured using data on the sales of pesticides under Regulation 1185/2009.

Furthermore, the European Commission said ‘the Commission has committed to work on the development of further harmonised risk indicators, in conjunction with Member States, taking into account new data sources to better measure the evolution in the risks associated with the use of, and dependency on, pesticides. We are currently working with the European statistical DG, EUROSTAT to develop such data sources. **However, the achievement of the two pesticide targets under the Farm to Fork strategy will be measured as described above.**’

It is really unfortunate that the European Commission have chosen two indicators which are directly correlated: when a hazardous pesticide is officially removed from the market its sale will of course officially diminish. The indicators chosen will neither consider any of the pesticides used in derogation (HRI2), nor give any knowledge about actual use.

It worth mentioning, that HRI1, is also the indicator proposed by the European Crop Protection Association (ECPA) - now Croplife Europe - in the public consultation on the Farm to Fork Strategy, stating: ‘**ECPA views the use of the harmonised risk indicator 1 (HRI 1) developed and published by the European Commission as a reasonable way to measure the hazard reduction of pesticides used in both organic and conventional agriculture..... Any proposal for HRI targets should use a baseline level made from the average index in the period 2014-2017....**’.

The European Commission aims at using the average of 2015-2017 as the baseline years. PAN Europe made a feasibility analysis as a linear extrapolation based on the 2020 agricultural outlook, focusing on how to reach the 50% reduction target for pesticide use and risk using the currently proposed indicator (Harmonised Risk Indicator 1 with baseline 2015-17). As can be seen below, if the current trend continues, this target will be reached.



Maintaining the current choice of indicators means leaving the EU model of farming unchanged, which will result in the Farm to Fork pesticide use reduction targets remaining a paper tiger.

3. The way forward is developing use indicators and collecting use data from farmers

Almost two decades ago the European Union agreed to make pesticide use one of the agro-environmental indicators within the CAP. Pesticide record-keeping is a conditionality requirement of the Common Agricultural Policy as the general Food Law (Regulation No 178/2002) and its associated rules, in this case Regulation No 183/2005 on feed hygiene which in its Annex I, section II, (2) (a) states that ‘feed operators must in particular keep records on any use of plant protection

products and biocides". That is also why it is not considered eligible to pay farmers for pesticide record keeping under the Rural Development Programme. Finally, a number of MS, like Ireland, has informed PAN Europe directly that it has been mandatory for all farmers to register their pesticide use several decades ago.

Since 2011, farmers are obliged to keep records on their pesticide use under article 67 of Regulation (EC) No 1107/2009. Member States are obliged to identify trend in the use of certain active substance, identify priority areas and publish the results according to article 15 of the Directive 2009/128/EC on Sustainable Use of Pesticides (SUD) and obliged to provide use data to Eurostat under article 3 of Regulation (EC) No 1185/2009 on statistics on pesticides.

Back in 2017, the European Commission wrote in its report on the implementation of 1185/2009¹ that: *'The Commission...considers it important to further adapt the legislation on:*

- *Pesticides sales, so that all data that is not confidential can be made available to the public both as active substance, as well as in different forms of aggregation.*
- *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.'*

PAN Europe condemns the decades of inertia from the European Commission^{2 3} that has led to its failure to provide useful data that would inform both EU decision-making and EU citizens about the actual amount of pesticides used across Europe. In this context, the Commission's proposal to leave this situation unchanged until 2030 is particularly concerning.

The proper collection of use data is essential not only for calculating reliable and meaningful indicators, but also for the proper implementation of other EU environmental laws such as the Habitats and Bird Directives (Directive 92/43 and Directive 2009/147) and the Water Framework Directive (Directive 2000/60). For example, Member States are required to "collect and maintain information on the type and magnitude of the significant anthropogenic pressures to which the surface water bodies in each river basin district are liable to be subject" (Annex II section 1.4 of Water Framework Directive).

Similarly, Member States have the obligation under the SUD to take "appropriate risk management measures" in particular in protected areas (Article 12(b) of Sustainable Use Directive). It is also unclear just how Member States ought to take such appropriate measures, if they do not collect the data available to them under Article 67 of Regulation 1107/2009 (i.e. the data specifying which substances are actually used in these areas and in which quantities).

PAN Europe calls on the European Commission to prioritise the collection of reliable and precise data on the actual use of pesticides recorded by farmers and comparable across the EU. Measuring actual use of pesticides, especially if these are sector specific, is the only way for the European Commission to be truly engaged in the ecological transformation.

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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¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52017DC0109&from=EN>

² https://publications.jrc.ec.europa.eu/repository/bitstream/JRC118769/workshop_report_final1_1.pdf

³ <https://ec.europa.eu/eurostat/documents/749240/0/Statistics+on+the+agricultural+use+of+pesticides+in+the+EU>

