

## Pesticide checklist on National Strategic Plans of the Common Agricultural Policy

The European Union has agreed to reform EU's Common Agricultural Policy (CAP) and, as part of that, Member States (MS) need to prepare National Strategic Plans (NSP) by end of 2021. The European Commission is currently reading and commenting on the plans.

The purpose of this paper is to provide the European Commission services responsible for pesticides, DG SANTE, with a checklist, to be used during the assessment and approval process of the national strategic plans from a pesticide perspective, keeping in mind the current EU laws of relevance to pesticide use.

### Background information on the CAP and pesticides

#### EU Directive on Sustainable Use of Pesticides

Directive 2009/128/EC, aiming to achieve sustainable use of pesticides in the EU (SUD) makes it mandatory for farmers to apply Integrated Pest Management (IPM) as from January 2014 and mandatory for Member States to support farmers in the uptake of IPM.

The SUD foresees the following steps:

<p><b>Professional users</b> of pesticides <u>switch</u> to practices and products with the lowest risk to human health and the environment among those available for the same pest problem.</p>	<p>IPM principle N°8: Based on the <b>records on the use</b> of pesticides and on the <b>monitoring of harmful organisms</b> the professional user should check the success of the applied plant protection measures.</p>
<p><b>Member states shall take all necessary measures</b> to promote low pesticide-input pest management and organic farming, <b>giving wherever possible priority to non-chemical methods</b>"</p>	<p>Provide information and tools for pest <b>monitoring and decision-making</b>, as well as <b>advisory services on integrated pest management</b>" (Article 14(2)). Establish <b>appropriate incentives</b> to encourage professional users to implement <b>crop and sector-specific</b> guidelines for integrated pest management on a voluntary basis" Article 14.5).</p>

As part of the implementation, Member States of the EU were obliged to establish National Action plans (NAPs) in 2013 to set up their quantitative objectives, targets, measures and timetables to reduce risk, and as part of that identify which general principles farmers need to apply regarding IPM uptake.

To date, while the majority of the NAPs do recognize the problems with using pesticides, and the pesticide pollutions, the solutions that are being proposed today are [far from satisfying](#) as also mentioned in several of the [European Commission's own reports](#), especially regarding uptake of IPM.

#### The current Common Agricultural Policy on pesticides

Recital (35) of the EU Pesticide Regulation No (EC) 1107/2009 calls on: "*The Council should include in the statutory management requirement (...) certain support schemes for farmers and define the general principles of integrated pest management*". This in reality means that MS need to identify mandatory aspects of IPM that farmers need to apply without obtaining CAP support. When the CAP was reformed in 2013 MS and the European Commission agreed

on this to happen accordingly<sup>1</sup>. However, to PAN Europe's knowledge, the European Commission has still not asked the MS to define what they consider as mandatory IPM scheme, and therefore what would be the baseline in offering CAP funding to farmers.

The 2013 CAP reform made it mandatory for Member States to offer farmers information about alternatives and uptake of IPM via the [Farm Advisory Systems](#) (FAS). This means that from 2015, a farmer wishing to know about alternatives are entitled to obtain this information. However, again here, to PAN Europe's knowledge, the European Commission has still not verified to what extent this requirement is fulfilled by MS.

### The new CAP and pesticides

Despite huge public support for the new EU Green Deal (EGD) strategies and the objective of a 50% reduction in use and risk of pesticides by 2030 set in both the Farm to Fork (F2F) and the Biodiversity Strategies (BS), these targets were only included into the CAP Strategic Plan Regulation as recitals (122, 123). The implementing acts says that Member States are not obliged to include quantitative targets on these targets in their CAP Plans. They can, if they wish prepare an annexe to the NSP, but this annexe does not need to be approved by the European Commission.

However, in the new CAP there are two new pesticide-related indicators:

1. The annual result indicator (R.24) measuring the number of hectares where farmers are applying Integrated Pest Management as defined in article 3.4 and article 14.
2. The overall impact indicator (I.18) that will measure pesticide use and risk reduction at the end of the period. The indicator being used here is the harmonized risk indicator 1.

The fact that the CAP has specific pesticides indicators, means that MS, at least, have to address the issue of pesticides in their SWOT analysis. If the SWOT analysis concludes that actions are needed, interventions must be identified and proposed.

---

<sup>1</sup> The addendum specifies: "The Council and the European Parliament invite the Commission to monitor the transposition and the implementation by the Member States of Directive 2000/60/EC of 23 October 2000 establishing a framework for Community action in the field of water policy and Directive 2009/128/EC of the European Parliament and of the Council of 21 October 2009 establishing a framework for Community action to achieve the sustainable use of pesticides and, where appropriate, to come forward, once these Directives have been implemented in all Member States and the obligations directly applicable to farmers have been identified, with a legislative proposal amending this regulation with a view to including the relevant parts of these Directives in the system of cross-compliance."

## NSP pesticide checklist proposed by PAN Europe

### 1. Make sure that the NSP contains a complete analysis of the problems caused by pesticides and that the measures being proposed are able to solve the identified problems:

The new CAP includes both a result and an impact indicator on pesticides. Therefore, each Member State needs to address the “problem” of pesticide in their SWOT analysis and the needs assessment identified.

It is possible that MS will “recycle” part of the pesticides analysis done in the National Action Plans (NAPs) in 2014 and in the revision from 2019. [Analysis from PAN Europe](#) showed clearly that while a number of member states had made relatively honest analysis of the problems caused by pesticides, the measures being proposed to solve these problems were totally inadequate.

It is crucial that the European Commission evaluate whether NSP adequately address these needs, and therefore important to make sure MS clearly identifies problems caused by pesticides linked to human health, biodiversity, water, soil contamination recognised in the SUD and propose ‘interventions’ are able to solve the identified problems. If needed, PAN Europe and its member are willing to provide detailed information if needed.

### 2. Make sure that Member States have a system in place to support farmers in the uptake of non-chemical alternatives:

The SUD foresees that Member States shall ‘*take all necessary measures to promote low pesticide-input pest management, giving wherever possible priority to non-chemical methods, so that 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*’ and as part of that:

- Establish or support the establishment of necessary conditions for the implementation of integrated pest management. In particular, they shall ensure that professional users have at their disposal information and tools for pest monitoring and decision making, as well as advisory services on integrated pest management.
- Establish appropriate incentives to encourage professional users to implement crop or sector-specific guidelines for integrated pest management on a voluntary basis, while mentioning these in their National Action Plans.

As explained above, it is already mandatory for MS to inform about alternatives to pesticides as part of the FAS.

Furthermore, according to the DG SANTE own audit reports (FVO reports):

- Majority of MS: forecast and warning system on pest outbreaks in place and regular bulletins in place.
- Many MS: organises conferences and training on IPM.
- A number MS: had made it mandatory for farmers to inform national administration about annual pesticide use.
- No MS: define binding IPM measures for farmers to comply with SUD.

It is crucial that the European Commission verifies that the NSP sufficiently explains the support system in place supporting farmers in the move towards IPM-uptake.

### 3. Make sure the NSP identifies the general principles of IPM

It is mandatory for farmers to apply the general principle of IPM since 2014 according to SUD (article 14). Therefore, farmers should not be allowed to receive CAP funding for these general principles. However, despite the Council already in 2013 asked the European Commission to make sure MS identify what they are asking farmers to do when talking general principle of IPM, clarifications on this is missing.

The majority of the FVO reports also conclude that “*There is no system to verify that all professional users implement the general principles of IPM as required by Article 14 of Directive 2009/128/EC*”. The European Commission has in both [2017](#) and [2020](#) stressed that Member States and farmers are dramatically lacking commitment and engagement when it comes to implementing and spreading IPM across Europe.

As explained in this [Analysis from PAN Europe](#) on the NAPs it is difficult what MS has done to upgrade the rules to farmers since IPM is mandatory, and therefore impossible to understand the difference between conventional and IPM farming. As a result, the CAP funding has today not seemed to have identified the environment and agronomic baseline. In the annexe is an example of how this could be done.

To ensure consistency and compliance with the SUD it is crucial that the European Commission asks each MS to identify the general principle of IPM, which measures are mandatory for farmers to apply, and for which no CAP funding can be offered. These should be made publicly available, allowing the general public to be informed about the baseline of CAP payments.

### 4. Make sure the NSP identifies new and updated requirements towards farmers

The new CAP makes it mandatory for farmers to apply certain aspects of the SUD, as part of the cross-compliance: certified training (Article 5.2), inspection of equipment (Article 8.1- 8.5), restrictions on the use of pesticides in protected areas especially regarding biodiversity and water (article 12) and proper handling and storage of pesticides and disposal of remnants (article 13.1) and 13.3).

In order to ensure compliance with these new requirements, it is crucial that European Commission verified that MS clearly identify which actions farmers need to do to be in compliance with these requirements, and as part of that also explain what is not IPM. In the light of the increasing number of studies showing the negative correlation between biodiversity loss and pesticide usage, should be requested to be very specific regarding which measure they aim to put in place to ensure compliance with article 12 of the SUD.

### 5. Check that IPM measures relating to rural development and the fruit and vegetable schemes are all being updated and that they are building blocks also including eco-schemes, all having as the overall objective of seriously reducing pesticide use dependency

For decades, a number of MS have been offering CAP funding (within the rural development policy and/or through the fruit and vegetable scheme) to farmers for applying, on a voluntary basis, uptake of IPM. See [this PAN Europe report](#) for details.

It is crucial to ensure that make sure that these measures called commitments defined and updated especially important to make sure that these IPM commitments are linked to clear reduction targets and timetables engaging the farmer (ex. engaging in 50% reduction in three years). We have been wasting so much time with the lacking engagement towards SUD, now is the moment to act.

## 6. Check the real pesticide use reduction commitments by farmers

The new CAP has a set of new [indicators](#) relating to pesticides say:

### The annual result indicator:

<a href="#">R.24<sup>PR</sup></a>	Sustainable and reduced use of pesticides	Share of utilised agricultural area (UAA) under-supported specific commitments which lead to sustainable use of pesticides in order to reduce risks and impacts of pesticides such as pesticides leakage
-----------------------------------	---	--

### The impact indicator – measuring trends over the entire period:

To contribute to halting and reversing biodiversity loss, enhance ecosystem services and preserve habitats and landscapes	<a href="#">I.18</a>	<a href="#">C.49</a>	Sustainable and reduced use of pesticides
	<a href="#">I.19</a>	<a href="#">C.36</a>	Increasing farmland bird populations
	<a href="#">I.20</a>	<a href="#">C.37</a>	Enhancing biodiversity protection
	<a href="#">I.21</a>	<a href="#">C.21</a>	Enhancing provision of ecosystem services
	<a href="#">I.22</a>	<a href="#">C.22</a>	Increasing agro-biodiversity in farming system

The European Commission should make sure that the result indicator R.24 on 'sustainable and reduced use of pesticides' explicitly count number of hectares where farmers are committing to an actual pesticide use reduction, for instance 50% reduction in a three years period (against his/her own baseline).

The European Commission should also make sure – as the result indicator R.24 in reality will be counting number of hectares where farmers commit to IPM – that hectares where farmers are applying vague concepts like precision farming, pesticides in derogations are not included into this result indicator.

Finally, it is needed to start discussions already now on the future of the impact indicator I.18 moving away from the controversial harmonised risk indicator 1 which is not measuring pesticide use reductions.

**For further information contact:** Henriette Christensen - [henriette@pan-europe.info](mailto:henriette@pan-europe.info)

*The sole responsibility of this publication lies with the author. The European Union is not responsible for any use that may be made of the information contained therein.*



## Annexe: Example from Denmark on how to integrate the IPM principles into cross compliance

As part of the SUD implementation the Danish public administration developed an IPM point system based on the wording on what IPM is according to the Annex III of the SUD. The original was to start by making it voluntary for farmers to fill in, towards becoming mandatory to fill in for farmers obtaining CAP funding, with the final idea of making it mandatory for farmer to obtain at least 60 points to become eligible to obtain CAP basic (first pillar) payments.

Unfortunately, the idea was never implemented, but while it definitely is not a perfect tool (ex. making no distinction between the various rotations) it is still an interesting concept.

The 8 ipm principles		Total IPM-point scored	Max. to be scored
		Practice	
1	The prevention of weeds, diseases and other harmful organisms — crop rotation, — use of adequate cultivation techniques (e.g. stale seedbed technique, sowing dates and densities, under-sowing, conservation tillage, pruning and direct sowing), — use, where appropriate, of resistant/tolerant cultivars and standard/certified seed and planting material, — use of balanced fertilisation, liming and irrigation/drainage practices, — preventing the spreading of harmful organisms by hygiene measures (e.g. by regular cleansing of machinery and equipment), — protection and enhancement of important beneficial organisms, e.g. by adequate plant protection measures or the utilisation of ecological infrastructures inside and outside production sites.		40
2	harmful organisms must be monitored by adequate methods and tools such as field observations, early warning systems, forecasting and diagnosis systems as well as advice from independent and qualified advisors.		12
3	Warnings, forecasts and threshold values are all essential for the decision-making process if and when to apply plant protection measures. regional and climatic conditions are also taken into account.		12
4	Sustainable biological, physical and other non-chemical methods are preferred to chemical methods if they provide satisfactory and cost-effective pest control.		8
5	The pesticides applied shall be as target specific as possible and have the least side effects on human health, not-target organisms and the environment.		8
6	Pesticide intervention is to be kept to a minimum, preferably by applying reduced doses, limiting frequency of application as much as possible and by partial application, thereby reducing the risk of development of pesticide resistance.		10
7	When there is a known risk of resistance developing, the pesticide in question is either to be replaced with another product or a mixture of pesticides with different modes of action.		5
8	Spray records and presence of harmful organisms are continuously monitored to assess the success of the applied plant protection measures.		5
<b>Total points score for implementation of IPM principles</b>			<b>100</b>

Source: IPM-points scoring system, the knowledge Center for Agriculture, Denmark, 2013

URL: [https://www.landbrugsinfo.dk/planteavl/plantevaern/ipm/Filter/pl\\_php20130111\\_ipm-point\\_system\\_ver\\_1\\_uk\\_Danish\\_epa.xls](https://www.landbrugsinfo.dk/planteavl/plantevaern/ipm/Filter/pl_php20130111_ipm-point_system_ver_1_uk_Danish_epa.xls)