

MEMBER STATES ACT AGAINST EU PESTICIDE REDUCTION

Part of the “Farm to Fork” strategy, reducing pesticide use and risk by 50% by 2030 is one of the European Commission's central measures to promote healthy ecosystems and biological diversity as well as to help achieve the biodiversity strategy, the biodiversity and climate goals of the European Green deal.

So far, the legally binding reduction in the use of pesticides has faced very strong headwinds from pesticide manufacturers and agricultural organizations.

The released documents obtained by PAN Europe under the [Request a Document - Consilium](#) show for first time what Member States' positions on the matter really are.

France is the only Member State currently supporting the call for 50% reduction in pesticide use and risk by 2030. Austria is the only country openly against this proposal, while Lithuania and Ireland gave an indirect critique.

France and Sweden proposed to introduce measures into the EU Directive on Sustainable Use of Pesticides to protect pollinators with Austria opposing.

France and Portugal recognize the importance of making Integrated Pest Management (IPM) concrete, reminding that it is mandatory and needs integrating into the EU Common Agricultural Policy, while a large majority of Member States are extremely reluctant to engage in the move towards IPM.

Finally, the released documents show that three Member States (Latvia, Poland and Sweden), while carefully avoiding any mention of the reduction targets, called on the EU to deliver impact assessments to accompany any revision looking at environmental and health aspects, in a move that strongly echoes industry's claim of the reductions leading to potential lost competitiveness.



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BACKGROUND

- ◇ Directive 2009/128/EC aiming to achieve sustainable use of pesticides in the EU (SUD) was adopted in 2009 with the aim to reduce the risks and impacts of pesticide use on human health and the environment and to promote the use of integrated pest management and of alternative approaches or techniques such as non-chemical alternatives to pesticides to reduce dependency on the use of pesticides.
- ◇ 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. PAN Europe has prepared several reports, studying the NAP, highlighting the bad implementation by Member States, for instance [this report](#).
- ◇ The European Commission prepared a report in [2017](#) commenting on the lacking implementation encouraging Member States to revised their NAPs accordingly, but as the report that the European Commission prepared in [2020](#) shows this has not happened.
- ◇ The European Commission's 2020 report is among others based on conclusions from audits undertaken in 2018-19, to [Austria](#), [Bulgaria](#), [Cyprus](#), [France](#), [Greece](#), [Hungary](#), [Ireland](#), [Lithuania](#), [Portugal](#), [Romania](#), and [Spain](#).
- ◇ The European Parliament prepared a [report](#) on the European Commission's first SUD evaluation and the European Council held a round table of ministers to welcome the report but no official 'Council Conclusion' was prepared.
- ◇ In 2020 the European Court of Auditors prepared several special reports highlighting the failure of EU pesticide regulation, first in a [report](#) concluding that there has been 'little progress' in the implementation of the SUD, then in a [report](#) concluding on the failure in EU actions to protect biodiversity (in particular pollinators).
- ◇ In December 2019, the European Commission presented its [European Green Deal](#) aiming at making the EU's economy sustainable.
- ◇ In May 2020 the European Commission published the [Biodiversity](#) and [Farm to Fork](#) strategies on 20 May 2020. Both strategies envisage as a central measure a 50 percent reduction in the use and risk of pesticides throughout Europe by 2030, as a follow up to the [response](#) that the European Commission gave to the 1,3 million EU citizens who signed the European Citizen Initiative 'Ban glyphosate and protect people and the environment from toxic pesticides'.
- ◇ On 25 May 2020, the European Commission sent its [report](#) to the 27 EU Member States and the European Parliament. The Commission report concludes that the aim of revising the SUD includes the 50% reduction in use and risk of chemical pesticides by 2030 target.
- ◇ In June 2020, the European Parliament decided not to make a report on this occasion, but instead react to the EU Commission's strategies.

◇ In July 2020, the German Presidency surprisingly decided to include the response to the EC report on the Council agenda and make it the subject of a political consultation process. The German EU Presidency asked all EU Member States to reply to two questions of relevance to the SUD, namely: a) “Do you have general comments regarding the conclusions of the Commission especially regarding their completeness and their conclusiveness?” and b) “How can the implementation of the integrated pest management be improved?”. Based on these replies, the German presidency prepared an initial text for ‘proposal for Council Conclusion on the SUD’ without making references either to the 50% use reduction target, or the biodiversity crises.

On [9 December 2020](#) [this](#) draft Council Conclusion passed COREPER 1, becoming the final Conclusion on [15 December 2020](#) approved by ministers without discussion as an A point.

At the request of PAN Europe on 24 September 2020 asking access to Working Paper (WK 8636/2020 INIT) 'Council Conclusions on the REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL' on the experience gained by Member States on the implementation of national targets established in their National Action Plans and on progress in the implementation of Directive 2009/128/EC on the sustainable use of pesticides and all relating documents.

The General Secretariat of the Council (GSC) informed PAN Europe on the 9 November that they had examined the request and identified 36 documents from 25 May until 6 November 2020. GSC sent 10 documents to PAN Europe on 9 November, and after a reminder from PAN Europe, the remaining documents arrived on 25 November.

These 36 documents are briefly described below and made available via web link, below:

On 16 July, the German Presidency of the Council informed the other Member States in a [letter \(WK 7883/2020 INIT\)](#) of its intention to submit two Commission reports to the Council. These are the report ([SUD](#)) and the report ([REFIT](#)).

A first online kick-off meeting was scheduled for 22 July with a [presentation](#) from the European Commission ([WK 8074/2020 INIT](#)), following which delegates were invited to send general comments on the Commission's conclusions, in particular with regard to their completeness and consistency, as well as proposals for improving the implementation of Integrated Pest Management to the German Presidency by 21 August ([WK 8154/2020 INIT](#)).

The following Member States had submitted comments and proposals to this effect: the Netherlands (25.08 [WK 8588/2020 INIT](#)), Luxembourg (26.08 [WK 8588/2020 ADD 1](#)), Austria (26.08 [WK 8588/2020 ADD 2](#)), Denmark (26.08 [WK 8588/2020 ADD 3](#)), Estonia (26.08 [WK 8588/2020 ADD 4](#)), Ireland (26.08 [WK 8588/2020 ADD 5](#)), Portugal (26.08 [WK 8588/2020 ADD 6](#)), Finland (26.08 [WK 8588/2020 ADD 7](#)), Slovenia (26.08 [WK 8588/2020 ADD 8](#)), Greece (26.08 [WK 8588/2020 ADD 9](#)) Poland (26.08 [WK 8588/2020 ADD 10](#)) and France (23.09 [WK 8588/2020 ADD 11](#)).

On 28 August, the German Presidency informed member states about the time table of the Commission work ([WK 8265/2020 INIT](#)).

On 14 September, the German Presidency presented a first draft of the Council conclusions on the Commission report ([WK 8636/2020 INIT](#)) inviting member states to a video conference to discuss this draft with Member States in a meeting on 22 September ([WK 9534/2020 INIT](#)). Following this videoconference, the Presidency invites Member States to submit their comments and proposed amendments in writing by 9 October ([WK 9897/2020 INIT](#)).

The following Member States had submitted comments and proposals to this effect:

Sweden (15.10 [WK 8636/2020 ADD 1 REV 1](#)), Poland (7.10 [WK 8636/2020 ADD 2](#)), Denmark (8.10 [WK 8636/2020 ADD 3](#)), Latvia (9.10 [WK 8636/2020 ADD 5](#)), Lithuania (9.10 [WK 8636/2020 ADD 6](#)), Finland (12.10 [WK 8636/2020 ADD 7](#)), France (21.10 [WK 8636/2020 ADD 8 REV 1](#)), Hungary (14.10 [WK 8636/2020 ADD 9](#)), Netherlands (16.10 [WK 8636/2020 ADD 10](#)) and Slovakia (19.10 [WK 8636/2020 ADD 11](#)).

On 26 October sent a revised draft for the Council conclusions (WK 8636/2020 REV 1). On 29 October the European Commission comments on the draft of the Council conclusions ([WK 8588/2020](#) ADD 12).

Until the 6.11 (end of our access to request) the following Member States had submitted comments and proposals to this effect:
Sweden (4.11 [WK 8636/2020](#) REV 1 ADD 1),
Austria (4.11 [WK 8636/2020](#) REV 1 ADD 2).

So, in the period from May to 6 November:

Germany, Cyprus, Malta, Croatia, Spain, Italy, Romania, Belgium, Bulgaria and Czech Republic did not contribute to the SUD debate.

Luxembourg, Greece, Hungary, Ireland, Estonia, Portugal, Slovakia, Slovenia, Lithuania, Latvia, only contributed once, either replying the questions from the German presidency or proposing changes to the German presidency drafts for Council Conclusions.

Denmark, Sweden, Austria, France, Poland, Finland, Netherlands contributed both by replying to questions from the German presidency and proposing changes to the German presidency drafts for Council Conclusions.

ANALYSIS OF THE DOCUMENTS

The German presidency abstained from asking questions to the Member States and did not include any reference in the proposal for draft Council Conclusion regarding the 50% pesticide reduction targets proposed by the European Commission in Farm to Fork and the Biodiversity Strategy, despite the Commission report mentioning that.

Instead, the German presidency prepared a disappointing draft refusing to acknowledge Member States' grave lack of effort, only proposing soft and voluntary measures such as training and research as the way forward, while sidelining all discussions on the idea of fixing EU-wide pesticide reduction targets and looking forward.

A few Member States did try to improve the German presidency text as follows:

- ◇ France proposes to link the SUD revision to the discussions of the quantitative use targets, but proposing to use the controversial Harmonised Risk Indicator 1 (HRI1) as indicator. Lithuania, Ireland, Portugal and Denmark referred to the Farm to Fork in their reactions recognising that changes are needed but without making reference to any specific percentage.
- ◇ France, supported by Sweden, proposed to expand the scope of the SUD to include pollinators in the upcoming revision of the SUD.
- ◇ Denmark highlights the potential that pesticide taxation has as an economic incentive to reduce pesticide use.
- ◇ France agrees with the European Commission on the poor monitoring of IPM, recognising the significant potential to reduce risk through the wider adoption of IPM practices, including the more widespread adoption of non-chemical pest control techniques, including agro-ecology.
- ◇ France calls on the European Commission to harmonise arrangements aimed at monitoring and controlling IPM implementation. Luxembourg and Austria echoed this, calling for the European Commission to propose an IPM baseline, to be respected equally in all Member States.
- ◇ Portugal recognised that IPM elements of the SUD are considered as statutory management requirements of the future Common Agricultural Policy (CAP) and that relevant IPM indicators are progressively included as part of the common conditions that farmers should comply with to benefit from direct payments under the various income support schemes, while France recognised the possible extra charges due to implementation of IPM, different tools could be mobilized, including the incentives of the CAP.
- ◇ Latvia and Sweden call on the European Commission to collect and compile results of research projects on sustainable plant protection to promote widespread application.
- ◇ Luxembourg mentions that criticism of HRI1 should take into account that the trend of decreasing risks as shown by the HRI1 is not due to changes in actual PPP use patterns, but to the non-renewal of approval of active substances that meet the cut-off criteria; meaning that the target of 50% risk reduction by 2030 could therefore be met by simply further withdrawing or not renewing the approval of such active substances, without any change in PPP use patterns and all member states, recognising the importance of further developing the indicators to measure quantitative use targets.

The majority of the Member States are watering down the bad text even further:

- ◇ The Netherlands, supported by Austria, argued that uptake of alternatives is always more expensive, setting aside not only the fact that farmers can be compensated within the CAP, but also that alternative practices that might seem costly in the short run, over time can become a benefit.
- ◇ Denmark points at precision farming – rather than agronomy – as the key in the IPM implementation. This is supported by Portugal, that even asked to **'further discuss the appropriate legal frame of precision agriculture technologies such as the use of drones in the application of plant protection products and work towards demonstrating that the use of low flying drones is an effective mean of reducing exposure and environmental risks in comparison to other aircrafts'**.
- ◇ Finland, supported by other Member States, argued for the need for further research rather than pointing at the many non-chemical alternatives that are already available today but are still not fully implemented.
- ◇ The majority of Member States focused on productivity rather than on farmers' income and negative externalities in the pesticide debate, illustrated by Slovenia arguing that **'Farmers economically dependent on yield cannot risk the losing crops if there are no efficient alternatives to be used'**.

◇ Three member states (Latvia, Poland and Sweden,) while not mentioning the reduction target by one word, all used exactly the same wording in calling on the EU to deliver an impact assessment to accompany any revision looking at environment and health aspects, echoing the industry's claim to consider potential lost competitiveness.

◇ A number of Member States defend themselves as a result of an audit that the European rather than actually engaging in the debate, ex. Greece argues that it takes time to develop the needed supported structure able to accompany farmers in the ecological transition

GLOBAL 2000 and PAN Europe have carried out a fact-check of the arguments put forward by the Austrian Ministry of Agriculture against the Commission proposal: As a result, none of the arguments stood up to closer scrutiny.

For example, the Ministry of Agriculture claims that 'Targets have to be realistic and many are not comparable with those of other member states' citing the example of Austria, which 'has a very high percentage of biological farming. To increase this percentage by as high a margin as member states with a much smaller percentage is virtually impossible.' But in reality the Commission's [goal](#) is help the EU's organic farming sector to grow, with the goal of 25% of total farmland being used for organic farming by 2030. So, for countries having with a higher percentage of organic this objective will be easier not more difficult to reach.

CONCLUSION



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The latest draft that we have seen does not recognize the negative influence of pesticides on biodiversity, despite hundreds of studies making that link (including Geiger et al. 2010, Beketov et al. 2013, Pelosi et al. 2013, Woodcock et al. 2017, Sanchez-Bayo and Wyckhuys, 2019) most recently echoed by the European Environment Agency's report on the State of Nature in the EU 2020.

Instead it argues that the farming sector is already delivering biodiversity benefits and that moving towards another system will become too expensive by saying **'HIGHLIGHTS that IPM is to a certain extent already part of today's farming' and 'STRESSES that incorporating alternative methods and technologies on farm level also requires adaptation and adequate investment and demonstration while that further changing practices it should not lead to a disproportionate economic burden for farmers'**. This actually means that Member States are not in the least concerned with the extent of the decline in biodiversity despite the clear evidence of its collapse.

This is an extremely serious situation. Not only for Europe's citizens, animals and plants but also for the farmers themselves. Several researchers have been trying to place a value on the activity of insect-provided ecosystem services. Pollinators add a value of US\$215 billion per annum to crop production (Gallai et al. 2009), while the economic value of natural pest control has been calculated to represent a global annual value of 400 billion US\$ per year (Costanza et al. 1997). The present trajectory of biodiversity loss means that in Europe this gift of nature is now almost gone.

Actually, it seems that neither the German presidency nor several Member States actually understand IPM. They don't understand that IPM is a systematic

approach to crop production requiring all parts to function together. They don't understand the huge progress made across several greenhouse crops, orchards and vineyards. They aren't taking the time to seriously consider the huge strides towards IPM by those arable farmers who have already made progress despite their own lack of ambition. They don't understand that the present high input/high output system of farming exposes farmers to severe financial risk and they don't understand that because of careful soil, land and crop focus of IPM, farmers undertaking it actually are less exposed to losses.

In reality, pesticide use compromises natural pest control which, in turn, increases pesticide dependency. In agriculture, the vast majority of potential pests are controlled naturally by insect predators, such as ladybirds or parasitic wasps. When these beneficial insects are eliminated, through habitat loss or pesticide use, pest problems are seriously aggravated. To break this negative spiral, the agroecosystem needs to be diversified so that populations of natural pest enemies can regenerate and protect crops from pest damage. Largescale projects in the Netherlands and the UK have shown that conventional farmers who developed landscape structures targeted to insects providing natural pest control could reduce pesticide use by 90% while yields were maintained or even increased.

The way forward is for farmers to embrace the ecological transition that the European Green Deal is proposing, and to stop killing pests and start managing them instead in an approach based on working **with** – not against - nature. IPM is a part of EU legislation because EU policy, even at heads of government level, recognises its vital role.

Incredibly, Member States, seem incapable of understanding this.