


Activity Report

2022



**Pesticide
Action
Network**
Europe



Introduction and Welcome by the President

Pesticide Action Network (PAN) Europe is part of a larger network of over 600 non-governmental organisations, institutions and individuals in more than 60 countries worldwide. PAN Europe is the regional centre for Europe alongside four other autonomous regional centres; North America, South America, Asia-Pacific and Africa. Today, PAN Europe counts 47 members among consumer, public health, and environmental protection organisations, women's groups and educational associations, from 28 European countries of which 23 are in the EU.

PAN Europe's main objectives are to promote EU policy and legislation to reduce dependency on pesticides, to advocate sustainable alternatives, to raise awareness on the risks of exposure to pesticides both for our health and the environment, and to provide its expertise for an adequate implementation and further development of EU legislation and policies.

These objectives were fully achieved in 2022 by obtaining a 50% reduction of pesticide use and risk, in the European Commission (EC) proposal for a Sustainable Use of Pesticides Regulation (SUR); by pushing Member States to substitute the most hazardous pesticides, namely the Candidates for Substitution (CFSs), via PAN Europe's **Toxic 12** Campaign; and by creating a coalition of European NGOs fighting for the ban of glyphosate while Member States were prolonging glyphosate's licence for an additional year. PAN Europe's team also worked very hard throughout 2022 to ensure that the voice of more than one million citizens, signing the **Save Bees and Farmers** ECI, was heard, while safeguarding the European Green Deal's (EGD) promise to stop the export of EU-banned pesticides.

"2022 has been a year of transition for PAN Europe, with the departure of Henriette Christensen, who established the Brussels-based PAN non-profit organisation in 2010, as well as the appointment of Dr. Martin Dermine, as the Executive Director of PAN Europe. The organisation is steadily growing and structuring itself to expand its work to new topics, while becoming more organised and resilient. I wish to express my gratitude to the dedicated work from the staff and, in particular, thank Henriette Christensen for the major role she played in the organisation for 14 years. Let us move towards a pesticide-free Europe!"

Koen Hertoge

Koen Hertoge, President of PAN Europe

EU Pesticide Policy



1.

New Sustainable Use of Pesticides Law

In the framework of the Farm to Fork (F2F) Strategy and the Biodiversity Strategy (BS), the EC has committed to reduce the use and risk of pesticides by 50% by 2030, while also reducing the use of the most hazardous pesticides, namely the Candidates for Substitution (CFSs), by 50% by 2030. In June 2022, the EC published a Sustainable Use of Pesticides Regulation (SUR) proposal. Thanks to the leading role of PAN Europe in coordinating European NGO advocacy work around the formulation of the proposal, the European Commission kept the 50% pesticide use and risk target, despite the strong lobby of the agribusiness that used the war in Ukraine as a danger for food security, and therefore argued for the pressing need to continue using pesticides in conventional agriculture. The new EC SUR proposal also foresees a ban of chemical pesticides in sensitive areas, nature sites and public areas. If the formulated EC proposal is maintained and even improved, during the trilogue negotiations with the European Parliament and Council, it will represent an important move towards a nature-based model of farming in Europe, with the possible achievement of a pesticide-free agriculture by 2050.

2.

Environmental Risk Assessment of Pesticides

In 2022, PAN Europe prioritised its work on the environmental and health risk assessment of pesticide co-formulants. Co-formulants are part of the mixtures contained in pesticide products, serving to enhance the product's toxicity. These are for instance surfactants, anti-foaming agents, solvents, or wetting agents. The co-formulants can make up more than 50% of a product's formulation. Many of them are very toxic while others increase the toxic effect of the active ingredient on both citizens' health and the environment. In 2022, the EC Directorate General (DG) for Health and Food Safety started working on a draft called "Implementing Regulation on Co-formulants". In the final proposal submitted for consultation, the Commission included an improved requirement (Requirement 10), thanks to our team's advocacy work. This requirement confirms that the level of protection against pesticide co-formulants is the same as for pesticide active substances.

In addition, in 2022 PAN Europe was a front-runner in the elaboration of a framework that aimed at establishing the risk posed by pesticides on wild bees (bumble bees, solitary bees), focusing on the adoption of an updated risk assessment of pesticides on wild bees [the European Food Safety Agency (EFSA) Bee Guidance Document]. Moreover, in 2022, PAN Europe carried out intense advocacy work on this topic together with three organisations, namely BeeLife, Pollinis and Apimondia. Following the publication of an opinion by the European Food Safety Agency, we started working on the risk assessment posed by pesticides on amphibians and reptiles.

3.

Enhance the implementation of Environmental Rules in Member States and the fight for the precautionary principle

One of the major issues linked to pesticide exposure in the EU is the bad implementation of the Plant Protection Product Regulation (EU1107/2009) at Member States level. PAN Europe has worked closely with its most engaged members to ensure a strict implementation of the rules and a ban of the most hazardous substances. PAN Europe's research on derogations, given by Member States to EU-banned highly hazardous pesticides, has revealed that over the last four years, 236 derogations were given to 14 highly hazardous and normally banned substances.

Some of PAN Europe's successes

First, at the end of 2021, the European Commission proposed Member States to ban Sulfoxaflor, a new-generation neonicotinoid. Thanks to the advocacy work of PAN Europe and its members, Sulfoxaflor was banned in April 2022. Second, in March 2022, PAN Europe went to the hearing of the Court of Justice of the EU (CJEU) to present its views to the Court on five prejudicial questions that the Belgian Administrative Court had sent to the CJEU (case C162/21), upon PAN Europe's request. The five questions concerned the provision by EU Member States of derogations for the use of EU-banned neonicotinoids. PAN Europe pleaded for a strict implementation of the law and for not allowing derogations for EU-banned pesticides. In September 2022, the Advocate General published an opinion favourable to PAN Europe's demands. The case was won in January 2023 when the Court confirmed that derogations for EU-banned neonicotinoids were not allowed.

4.

Halting the export of EU-banned substances and their use in third countries

PAN Europe has worked throughout 2022 to ensure that the EGD promise to stop the export of EU-banned pesticides would become a reality. PAN Europe has coordinated the advocacy work on this issue in parallel with the organisation of an event on the export of EU-banned pesticides and sent a statement to Environment Commissioner Sinkevicius, asking to accelerate the work on the ban. PAN Europe has advocated to ensure the ban of imported food which contains EU-banned pesticides. In collaboration with other NGOs, PAN Europe has also denounced the links between the Food and Agriculture Organisation (FAO) of the United Nations and CropLife International.



<https://curia.europa.eu/juris/documents.jsf?num=C-162/21>

The success of the European Citizen Initiative Save Bees and Farmers

PAN Europe made the European Citizen Initiative (ECI) **Save Bees and Farmers** a success. The ECI was signed by over one million European citizens in 2022 and thus making it the 7th successful ECI (in a period of more than 10 years), among more than 100 ECIs launched in the EU. This is also the second successful anti-pesticides ECI. In fact, PAN Europe has been one of the founding organisations of the previous anti-pesticides European Citizen (ECI) initiative on **Stop glyphosate, moving towards a pesticide-free world**, which was successful in 2017 with 1.3 million signatures. The **Save Bees and Farmers** ECI demands 80% pesticide use reduction by 2030 and 100% pesticide use reduction by 2035. Therefore, this ECI will be key to creating a pesticide-free agriculture in Europe.





An impactful Pesticide-Free Towns campaign

PAN Europe's advocacy work and Pesticide-Free Towns (PFT) campaign, involving mayors of renowned European cities to become pesticide-free, put pressure at the EU policy level. In fact, the new SUR proposal calls cities and towns to be 100% pesticide-free in addition to sensitive areas. This ambitious target, that the European Commission is proposing, is the result of the many European best practices showcased by the campaign as well as the mayors' pledge. On 28 September 2022, a symposium on PFTs was organised in the European Parliament, co-hosted by MEPs from four political groups. The organisation of the symposium was the occasion to invite dozens of mayors from across the EU. The new provision of the SUR proposal will impact all mayors and citizens across Europe and will mark a clear step forward, towards the non-toxic environment objectives of the EGD.



Denouncing the most hazardous pesticides

In 2022, PAN Europe launched its Toxic 12 campaign, asking to substitute the most hazardous pesticides, namely the Candidates for Substitution (CFSs) with safer alternatives. The campaign was launched, with the publication of a report in May of the same year, highlighting that residues of the most toxic pesticides have increased in EU fruit and vegetables since 2009. Thanks to this report, which has received significant media coverage, and another one that followed, the European Commission has confirmed to PAN Europe that they would revise the Guidance Document on comparative risk assessment and pesticide substitution.

PAN Europe has also carried out an important preparatory work on creating a coalition of European NGOs active on glyphosate. In 2022, EFSA announced that it would postpone the publication of its scientific assessment of glyphosate to July 2023. This led Member States prolonging glyphosate's licence for an extra year. PAN Europe coordinated the creation of a coalition of NGOs, active against the reapproval of the hazardous substance in 2023. PAN Europe also updated its report on safe alternatives to glyphosate, which will be published in 2023. Moreover, to raise awareness on the issues of pesticides' toxicity among the general public, PAN Europe took part in three street actions: one in relation to the annual Forum for Agriculture, one ahead of a Council meeting on SUR and a third one after a litigation case lost by Bayer in 2022. The latter took place in front of Bayer's Brussels headquarters.



Inside PAN Europe

Board Members

Koen Hertoge

President

David Cary

Treasurer

Nick Mole

Secretary

Andrzej Nowakowski

Member

Seda Orhan

Member

François Veillerette

Member

Paula Silva

Member

Koldo Hernández

Member

Laurent Gaberell

Member

Balazs (Bob) Tomori

Member

Jana Simanovska

Member

Staff

Martin Dermine

Executive Director

Henriette Christensen

Senior Policy Adviser for Agriculture/
Finance Manager

Katerina Iordanopoulou

Administration and Membership Manager

Hans Muilerman

Senior Chemicals Coordinator

Salomé Roynel

Policy Officer (Chemicals)

Natalija Svrtan

Campaigner (Pesticide Free Agriculture &
Pesticide Free Towns)

Gergely Simon

Senior Chemicals Officer

Manon Rouby

Policy Officer & Legal Adviser

Tjerk Dalhuisen

Senior Communications Officer

Emilie Ballivian

Communications Assistant

Angela Rupp

Campaigner

Mecki Naschke

Coordinator (Ban Glyphosate Campaign)

Acknowledgments

Pan-Europe gratefully acknowledges support of the **Life Programme of the European Commission Directorate-General for Environment**, and the **European Environment and Health Initiative (EEHI)**, the **Oak Foundation**, the **Marisla Foundation**, **Sum of Us**, **QiGreen** and **Léa Nature**.

