The European Commission misleadingly claims a 20% reduction in risks posed by pesticides in the EU

Yesterday the European Commission published - for the first time - trends in the newly established Harmonised Risk Indicators intending to measure the evolution of the risks posed by pesticides in EU Member States.

While PAN Europe welcomes the European Commission’s intention to finally collect data on pesticide sales and to convert these into risk indicators, we seriously regret that European citizens are still left in the dark about pesticide use, even in their own neighbourhoods, especially as a decade has passed since the SUD was approved.

The Directive 128/2009/EC on the Sustainable Use of Pesticides (SUDP) foresees in article 15 that the European Commission shall calculate risk indicators at Community level while Member States shall publish trends in the use of pesticides. Priority items shall be identified at national level in order to reduce risks (e.g. most toxic active substances, crops, regions or practices).

Yesterday (1) for the first time ever the European Commission published trends in the Harmonised Risk Indicators (HRI) for the period 2011 to 2017:

- HRI1 measures sales data (quantities of pesticide active substances placed on the market) weighted by a human toxicity factor; HRI1 indicates a 20% reduction in the risk posed by pesticides to human health and the environment, while
- HRI2 measures the number of emergency authorisations (derogations); it indicates a 50% increase in the period.

PAN Europe welcomes the European Commission’s intention to collect sales data and convert these into risk indicators. However, it remains unclear to us why the European Commission:

- Is arguing that HRI1 intends to measure risk reduction for the environment as well, as in reality the environmental aspects are not included (2);
- The HRI is not based on science and artificially places pesticides in groups with a certain arbitrary weighting factor; this means that the HRI is not transparent and the Commission cannot prove there is an actual risk reduction;
- Omits to mention that – remarkably - the sales of pesticides in the same period remained unchanged at 380 Million kg of active substances sold in the EU per year (3); there is thus no reduction in pesticide use, contrary to what the SUD is asking for;
- Omits to mention that Member States have scandalously opposed to deliver statistics on pesticides use since 2016 and have been badly implementing the SUD since its publication in 2009.

President-elected Ursula von der Leyen has been setting a significant reduction in pesticide dependency and the uptake of non-chemical alternatives high on the agenda of the new Commission by explicitly laying down these objectives in mission letters to incoming commissioner for health, environment and agriculture and rural
PAN Europe calls on the European Commission and Member States to finally commit to respect the SUD and engage towards pesticides dependency reduction. We believe this should be done by:

- Adding indicators based on the pesticide use; in addition, a list of key EU crops that consume a lot of pesticides should be monitored (for instance apples, strawberries, wine grape, tomatoes, potatoes).
- Making it mandatory for Member States to collect and publish this data, which farmers are already obliged to register.
- Identifying specific active substances for which special attention is required. This is the only transparent indicator that shows which sectors are delivering on pesticides use reduction and which not. Such an indicator will allow politicians to intervene if action is needed.

PAN Europe calls for the quantitative use of pesticides to be reduced by 50% by 2025; this is to be introduced in two main policy areas undergoing revision - the SUDP and EU’s Common Agricultural Policy, reaching a 80% use reduction by 2030 and a full pesticide phase out by 2035.

Note to editor:

2. PAN Europe position paper on HRI from December 2018: [https://www.pan-europe.info/sites/pan-europe.info/files/PANEurope_%20HRI.pdf](https://www.pan-europe.info/sites/pan-europe.info/files/PANEurope_%20HRI.pdf)
3. [https://www.pan-europe.info/issues/pesticide-use-europe](https://www.pan-europe.info/issues/pesticide-use-europe)
4. [A Eurostat research on use collected so far from 2019 says](#)

   *For the pesticide use data collection, countries used flags to indicate confidentiality. As regards volume of pesticides used, completely non-confidential data sets were provided by only 14 countries (CZ, DE, EE, IE, IT, CY, LV, LT, HU, MT, AT, RO, SK, UK). All other countries flagged at least part of the items with different levels of confidentiality, or not for publication (which can e.g. be due to uncertainty in data due to low count). Since the national pesticide use statistics are aggregated data (also grossed-up to give national estimates of usage), based on data collection from farms, where no persons or economic entities can be identified (neither directly nor indirectly), Eurostat would have expected no confidential data.*

5. [in the written questions](#) to Members of the European Parliament S.Kyriakides says:

   ‘I believe we could collectively reflect on the possibility of setting an EU-wide mandatory target on reduction of risk from pesticides. This reflection would be based on the new Commission Report to the Council and Parliament on progress in the implementation of the Sustainable Use of pesticides Directive, and the assessment of the functioning of the recently assessed Harmonised Risk Indicators.’

6. [The Eurostat report on implementation of 1185/2009](#) says:

   *As users are often interested in specific active substances or groups of substances that differ from the predefined classes, the Regulation could be seen as too restrictive; it does not allow the proper analyses to be carried out. A good example is the recent discussions on neonicotinoids, the group of pesticides that are potentially causing damage to bees. The active substances concerned are not all in the same chemical classes in Annex III, which means that the Commission has not been able to provide all relevant data to the policy makers.*

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