

JOINT STATEMENT ON THE REVISION OF THE SUSTAINABLE USE OF PESTICIDES DIRECTIVE

February 28, 2022

We, the undersigned organisations, are deeply concerned about the lack of ambition in the proposal on the “**Sustainable Use of Plant Protection Products**” that the European Commission is planning to launch on 23 March. Given that the Directive on the Sustainable Use of pesticides (SUD) has failed to deliver on reducing the use of pesticides in the EU, it is high time for the Commission to introduce a proposal which will drive the transition towards agroecological food systems that protect biodiversity and human health.

The current agricultural model based on heavy use of machinery, fossil fuels, fertilizers and synthetic pesticides is today clearly showing its limits. In addition to devastating effects on the environment and health, this model has trapped European farmers in a vicious cycle of increased spending on pesticides to compensate for decreasing yields, without guaranteeing proper incomes. The economic benefits of this model are one sided and lay in the hands of a very concentrated industry, whose profits in Europe were estimated at 900€ million in 2017. In that same year, societal costs were estimated at 2.3€ billionⁱ.

The urgency of moving away from the use of synthetic pesticides is clear. Since the adoption of the SUD in 2009, there is increasing scientific evidence of the negative effects of pesticides, and of chemical cocktails¹ on all ecosystems, biodiversity and human health. Scientists warn that chemical pollution has exceeded safe limits for humanity, threatening the stability of global ecosystemsⁱⁱ. These risks are compounded when accounting for the effects of chemical pollution on biodiversity and climate changeⁱⁱⁱ.

Reducing the use of pesticides and transitioning towards a healthy, sustainable and toxic-free food system based on agroecology is both possible and necessary, as demonstrated by many hands-on experiences, practices and studies^{iv,v}. The 2017 INRAE study shows it is possible to significantly reduce the use of pesticides without affecting farms’ economic and productive performance^{vi}. Further research from IDDRI shows that agroecology can feed Europeans healthily, reduce agricultural greenhouse gas emissions by 40%, help to restore biodiversity and protect natural resources^{vii}.

Recently, 1.2 million Europeans signed the Save Bees and Farmers Citizens’ Initiative in which they demand a reduction of synthetic pesticides of 80% by 2030, a gradual phase-out of synthetic pesticides in Europe by 2035, and strong support to be given to farmers in their transition towards agroecology^{viii}. Massive investments and important policy changes are urgently needed to support EU farmers in freeing themselves from the pesticide industry. We also recall that the European Parliament “*emphasises the need for these reduction targets to be of a binding nature and the importance of pursuing them through holistic, preventive and circular approaches such as organic and agroecological practices*”^{ix}. The principles enshrined in Article 191.2 of the Treaty on the Functioning of the EU, must guide the revision of the SUD².

The Commission’s draft proposal for a Regulation on the Sustainable Use of Plant Protection Products **falls short in delivering the transformative changes needed to secure the EU’s transition towards agroecology**, despite a few positive elements.

¹ The EU safety assessments for pesticides are based on models rather than real-life studies and do not consider risks of pesticide cocktails and indirect effects in the food web. https://issuu.com/pan-uk/docs/the_cocktail_effect_-_report?fr=sODM1NzExOTMxNQ

² EU environmental policies should be based on the precautionary principle and on the principles that preventive action should be taken, that environmental damage should, as a priority, be rectified at source and that the polluter should pay: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:12008E191:EN:HTML>

We **welcome the proposal of a Regulation** to replace the current Directive which is essential in achieving effective implementation by Member States. Moreover, the proposal to **ban the use of pesticides in areas used by vulnerable groups and in sensitive areas**, such as Natura 2000 sites, is an important step in the right direction.

However, many elements of the proposal are worrisome and bring no improvements to the failed SUD. In addition, some positive aspects of the current SUD legislation, in line with the agroecological transition and the EU Green Deal's objectives, are absent from the draft proposal.

We urge the Commission to consider the following elements for its proposal for the new regulation:

1. Set the **transition to agroecological practices** and a pesticide-free future as a clear objective.
2. Establish **truly ambitious and legally binding reduction targets at both EU and national level** in the use and risk of synthetic pesticides, and to immediately ban the use of more hazardous pesticides. Moreover, the regulation should reflect the call of civil society for a gradual full phase out of the use of synthetic pesticides.
3. Maintain the aim for Member States to **reduce dependence on the use of pesticides**, as well as the need to promote the mandatory application of Integrated Pest Management (IPM), organic farming, non-chemical methods, and designate a sufficient share of agricultural area under high biodiversity landscape features.
4. **Upgrade the definition of IPM.** While the current legislation rightly makes reference to the need for the least possible disruption to agro-ecosystems, the way IPM is currently defined leaves too much room for destructive practices. Instead, the regulation must strengthen the definition by making the application of agroecological practices mandatory to achieve pesticide use reduction targets. The definition must set a hierarchy from least disruptive to agrosystems—including natural pest control—to most disruptive, with synthetic pesticides as a very last resort^x.
5. Require that **National Action Plans** drafted by Member States be reviewed and approved by the Commission and an expert group consisting of independent and environmental scientists and civil society to ensure transparency and independent scientific advice.
6. Exclude the incentivisation of **precision farming and genetic engineering techniques**, which will only maintain an industrial farming model and structural dependency on pesticides.
7. **Ban the use of highly damaging practices**, such as aerial spraying, seed coating, calendar spraying, the use of drones, and the use of synthetic pesticides in residential areas and areas frequented by children, without any exceptions. Provide for mandatory, appropriately sized buffer zones around houses, schools, offices and watercourses.
8. Ensure public access to **adequate statistics on pesticides** to monitor their use and effectively measure progress made on the binding targets. The regulation must include environmental indicators, set a short and clear deadline to improve the Harmonised Risk Indicators, and develop a comprehensive set of additional indicators.
9. Ensure that the budget of the **Common Agricultural Policy** is used to drive the transition towards agroecology.
10. **Change the name of the proposal** to, for example, the "Regulation to reduce dependence on synthetic pesticides". The name "Regulation on the Sustainable Use of Plant protection products" is a euphemism that uses biased terminology introduced by the pesticide industry. The use of synthetic pesticides is simply not sustainable.

We ask the Commission to urgently take on board these demands into the future legislation to ensure policy coherence between the EU Green Deal objectives and to chart the path towards a pesticide-free world. **The pesticide reduction objective of the Farm to Fork and Biodiversity Strategies must not remain an empty promise.**

References

- i Bureau d'Analyse Sociétale d'Intérêt Collectif (Basic), Analyse de la création de valeur et des coûts cachés des pesticides de synthèse (2021): lebasic.com/wp-content/uploads/2021/11/BASIC_Etude-Creation-de-Valeur-et-Couts-Societaux-Pesticides_20211125.pdf
- ii Persson et al. (2022), Outside the Safe Operating Space of the Planetary Boundary for Novel Entities, Environ. Sci. Technol: [10.1021/acs.est.1c04158](https://doi.org/10.1021/acs.est.1c04158)
- iii Groh et al. (2022), Anthropogenic Chemicals As Underestimated Drivers of Biodiversity Loss: Scientific and Societal Implications, Environ. Sci. Technol: [10.1021/acs.est.1c08399](https://doi.org/10.1021/acs.est.1c08399)
- iv D'Annolfo et al. (2015), A review of social and economic performance of agroecology, International Journal of Agricultural Sustainability: https://www.researchgate.net/publication/283721380_Social_and_economic_performance_of_Agroecology
- v van der Ploeg et al. (2019) The economic potential of agroecology: Empirical evidence from Europe. Journal of Rural Studies: <https://hal.archives-ouvertes.fr/hal-02625121/>
- vi Lechenet et al. (2017), Reducing pesticide use while preserving crop productivity and profitability on arable farms, Nature plants: <https://www.inrae.fr/en/news/reducing-pesticide-use-agriculture-without-lowering-productivity>
- vii Poux et al.(2018), An agroecological Europe in 2050: multifunctional agriculture for healthy eating. Findings from the Ten Years For Agroecology (TYFA). Iddri-AScA: www.iddri.org/sites/default/files/PDF/Publications/Catalogue%20Iddri/Etude/201809-ST0918EN-tyfa.pdf
- viii <https://www.savebeesandfarmers.eu/eng/>
- ix European Parliament resolution of 20 October 2021 on a farm to fork strategy for a fair, healthy and environmentally-friendly food system (2020/2260(INI)): https://www.europarl.europa.eu/doceo/document/TA-9-2021-0425_EN.pdf
- x <https://www.low-impact-farming.info/sites/default/files/2017-02/ipm-pyramid.pdf>

Signatories

Agroecology Europe
ARC2020
BeeLife
Biodynamic Federation Demeter International
BirdLife Europe and Central Asia
Client Earth
Compassion in World Farming EU
Corporate Europe Observatory
EuroNatur
European Coordination La Via Campesina (ECVC)
European Environmental Bureau (EEB)

EU and International organisations

European Federation of Water Services (EurEau)
European Professional Beekeepers Association
Feedback Global
FIAN European Sections
Friends of the Earth Europe
Greenpeace
Health and Environment Alliance (HEAL)
IFOAM Organics Europe
Justice Pesticides
Navdanya International
PAN Europe
Slow Food Europe

National organisations

Arche Noah
ASEED Europe
Asociacion Balear de Apicultores (Bee keepers association of the Balearic Islands)
Asociación Bee Garden
AssoBio
Biom Association
Birdlife Austria
Bond Beter Leefmilieu
BUND e.V. -Friends of the Earth Germany
Bündnis für eine enkeltaugliche Landwirtschaft e.V.
Centar za životnu sredinu - Friend of the Earth Bosnia and Herzegovina
DOF BirdLife
Earth Thrive
Eco Hvar
Ecologistas en Acción
Entraide et Fraternité

France Nature Environnement
Friends of the Earth Cyprus
Génération Futures
Greenpeace Belgium

Hnutí DUHA - Friends of the Earth Czech Republic
Hogar Sin Tóxicos (Spain)
ImPAACTe - Pour une politique agricole et alimentaire wallonne de la transition écologique
Inter-Environnement Wallonie
ISDE Italy, Associazione Medici per l'Ambiente

Latvian Ornithological Society (LOB)
Latvijas Dabas fonds (Latvian Fund for Nature)

Les Amis de la Terre Belgique
Lipu
Mouvement d'Action Paysanne
NABU Germany
NOAH - Friends of the Earth Denmark
Ogólnopolskie Towarzystwo Ochrony Ptaków
Oost West Centrum vzw
Pestizid Aktions-Netzwerk e.V. (PAN Germany)

Plataforma Transgenicos Fora
Save Our Seeds
Slow Food Nederland
Slow Food Italy
Slow Food Germany
Sociedade Portuguesa de Entomologia
The Greens Movement of Georgia - Friends of the Earth Georgia
Umweltinstitut München
Voedsel Anders
Voedsel Anders Nederland
Vogelbescherming Nederland - BirdLife in The Netherlands
WECF France

Werkgroep Natuurlijk Imkeren
WWF Italia
ZERO - Associação Sistema Terrestre Sustentável
Zukunftsstiftung Landwirtschaft

