January 2025

A Roadmap for a Pesticide Phase-Out

There is widespread agreement within the scientific community that failing to reduce pesticide use is not an option. In July 2023, over 6,000 scientists issued a warning about the urgent need for drastic pesticide reduction to protect people and biodiversity, and to ensure long-term food production.

The widespread use of pesticides not only threatens ecosystems and biodiversity but also impacts human health and human rights, including the right of present and future generations to live in a clean, healthy, and sustainable environment[1]. Pesticides degrade soil[2] and water quality[3], contribute to climate change, and accumulate in the environment, harming children's health and creating a toxic legacy that will harm the well-being of future generations[4].

Despite the well-documented risks pesticides pose to biodiversity and human health[5], the European Union has so far failed to tackle the issue of pesticide reduction. Although the Sustainable Use of Pesticides Directive (SUD) was introduced in 2009, pesticide sales and use in Europe have not decreased. Since then, the European Commission committed, as part of the Green Deal and Farm to Fork Strategy, to reduce the use and risk of chemical pesticides, as well as the use of the most hazardous pesticides, by 50% by 2030. However, the key legislation to achieve these goals - the Sustainable Use Regulation (SUR) - was abandoned in February 2024.

Over a million EU citizens have called for a pesticide phase-out through the Save Bees and Farmers European Citizen Initiative and are still awaiting a response from the European Commission. Also the Stop Glyphosate ECI, various Eurobarometer surveys, a recent IPSOS poll and the Conference on the Future of Europe demonstrate the overwhelming support among Europeans for significantly reducing pesticide use. Recently, in less than 3 months more than 260 000 Europeans signed a new petition that urges the European Commission to prioritise pesticide reduction.

Studies demonstrate that it is possible to feed Europe while reducing pesticide dependency[6]. Many farmers, as noted by Agriculture and Food Commissioner Christophe Hansen during his confirmation hearing in November 2024[7], wish to reduce their pesticide use and need support to do so. The conclusions of the Strategic Dialogue on the future of EU agriculture call for an

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[1] How can the EU better protect children from harmful pesticides - in Europe and beyond? — CRIN (2023)

[2] Heinrich-Böll-Stiftung (2024). Soil Atlas, JRC (2024). The state of soils in Europe, Beaumelle et al. (2023). Pesticide effects on soil fauna communities-A meta-analysis, Gunstone et al. (2021). Pesticides and Soil Invertebrates: A Hazard Assessment

[3] EEA (2024). Improving health and resilience of waters in Europe, EEA (2024). Europe's state of water 2024: the need for improved water resilience,

[4] UNICEF (2018) Understanding-the-impact-of-pesticides-on-children.pdf

[5] EEA (2023). How pesticides impact human health and ecosystems in Europe

[6] Schiavo, Michele, et al. (2021). An agroecological Europe by 2050: What impact on land use, trade and global food security?,
Tibi, Anaïs, et al. (2022). Protecting crops by increasing plant diversity in agricultural areas. Synthesis of collective scientific expertise.

[7] Hearing of Christophe Hansen, Commissioner-Designate, 4 November 2024

end to "business as usual" in agriculture[8]. These conclusions emphasize the need to reduce external inputs such as pesticides and highlight the importance of upholding existing legislation while finding effective ways to improve its enforcement.

A swift and just transition to phase out pesticides and safeguard our environment, biodiversity and people's health must remain a top priority for the new European Commission. This goal should be central to the EU's Vision for Agriculture and Food, which will be presented within the first 100 days of the new EU Commission.

Since the proposal for a Sustainable Use Regulation (SUR) was abandoned by the European Commission in February 2024, **here are our demands to make pesticide reduction a reality:**

1) Full implementation of the Sustainable Use Directive 2009/128/EC

The current Directive on the Sustainable Use of Pesticides (SUD) aims to reduce both the reliance on pesticides and their negative impact on human health and the environment[9]. However, the national implementation of the Directive has been severely lacking, as underlined by different analyses, including assessments from EU bodies themselves[10]. As a result of this insufficient implementation, pesticide use in the EU has not decreased - with pesticide sales remaining more or less the same over the last decade[11] - leaving citizens and the environment largely unprotected.

There is an urgent need for the effective implementation and enforcement of the SUD. This includes:

- ***Ambitious result-based National Action Plans:*** The European Commission must ensure that all member states, in collaboration with trade unions and civil society organizations, develop and effectively implement ambitious, result-driven NAPs. These plans should include clear quantitative reduction targets, ambitious timelines, specific measures, and meaningful indicators to assess the current state of pesticide use. Additionally, they must outline how all pesticides, beyond those considered low-risk natural options, will be reduced at the national level.
- ***Effective implementation of IPM:*** According to the SUD, member states are required to take all necessary measures to promote low-pesticide-input pest management, ensuring the effective implementation of the mandatory IPM principles. This includes establishing sector- and crop-specific rules and guidelines, along with high-quality, independent advisory systems. Crop-specific rules and guidelines should be based on

[8] Conclusions of the Strategic Dialogue on the Future of EU Agriculture, September, 2024

[9] Directive 2009/128/EC

[10] Implementation assessment on SUD by the European Parliamentary Research Service (2018)
Report on the SUD of the European Commission (2020)
Report on the SUD of the European Court of Auditors (2020)
PAN Europe, Reducing pesticide use across the EU - Sustainable Use of Pesticides, an EU Challenge: Very few Member States are engaging to reduce their use of pesticides

[11] Special report 20/2024: Common Agricultural Policy Plans – Greener, but not matching the EU's ambitions for the climate and the environment

the best available IPM measures, developed by independent scientists and experts in collaboration with farmers.

- ***The adoption of a crop-by-crop approach:*** Member states should adopt a tailored approach that considers the specific needs of each crop. Such a crop-by-crop approach can effectively reduce pesticide use without compromising agricultural productivity, starting with crops where pesticide reduction is the easiest to achieve and where it can have the most significant impact.
- ***Expanding independent advisory systems:*** While the CAP and the SUD mandate establishing advisory systems to provide specialized guidance on IPM, most farmers lack access to independent, high-expertise advisory services. Independent advisory systems, supported by sufficient public funding, are essential for helping farmers adopt IPM practices and implement alternatives to pesticides.
- ***Protecting citizens, nature areas and water resources*****:** The SUD includes several critical provisions that must be better implemented and monitored. This includes the requirement under Article 12 for member states to minimize or ban pesticide use in specific areas, such as those frequented by the general public or vulnerable groups, as well as in water and nature protection zones. Additionally, under Article 11, the SUD mandates that appropriate measures be taken - such as the establishment of appropriately sized buffer zones - be taken to protect the aquatic environment and drinking water supplies from pesticide contamination.
- ***Ensuring coherence with the implementation of other environmental legislation:*** Implementation of other environmental current and future legislation, such as the Water Framework Directive, the Habitats and Birds Directive and the Nature Restoration Law and upcoming Soil Monitoring Law, is essential. Current pesticide use impedes the requirements and objectives of the above-mentioned legislation. Ambitiously reducing pesticide use and risk is essential to ensure the objectives of these legislations are met.

2) Full implementation of Pesticide Regulation (EC) No 1107/2009

Regulation (EC) 1107/2009 outlines the approval criteria for pesticides, stating that they must not harm human or animal health or have an unacceptable impact on the environment. However, the implementation of this regulation is marked by significant deficiencies. The Special Committee on the Union's authorisation procedure for pesticides (PEST) has highlighted severe shortcomings in the current risk assessment and authorisation processes, stressing the urgent need for reform. In 2023, only 15% of their recommendations had been fully implemented[12].

- **Regulation 1107/2009 and the 116 recommendations of The PEST Committee must be fully implemented without delay.**

[12] European Parliament resolution of 16 January 2019 on the Union's authorisation procedure for pesticides (2018/2153(INI)), Gaps in the EU Pesticide Authorisation, PAN Europe, 2023.

3) Adequate indicators and pesticide data to measure pesticide use and risk

The EU must ensure that the necessary indicators are developed and that pesticide use data is consistently collected, made publicly available, and easily accessible. Needed measures include:

- ***Improving the indicators to measure pesticide reduction:*** The Harmonised Risk Indicator I (HRI-1) has been widely criticised for its misleading portrayal of pesticide reduction trends, including by experts[13] and the European Court of Auditors[14]. Despite long-standing criticism and EU institutions recognising that the indicator is unfit for purpose and needs replacement, the Commission has not proposed any changes to this indicator. Indicators for pesticide reduction should be significantly improved by considering the toxicity of pesticides, including their environmental toxicity, and by accounting for the area treated.
- ***Strengthening monitoring and reporting requirements:*** The EU should ensure yearly public reporting of pesticide usage - crop, regional and local specific - as well as mandatory monitoring of pesticides and their impact on different matrices (soil, water, air, biodiversity, indoor dust and people), using science-based and robust monitoring indices.
- ***Ensuring transparent access to pesticide use, IPM and monitoring data:*** It is essential to ensure public, digital, centralised and harmonised full access to pesticide use data and pesticide monitoring data. Registering and communicating Pesticide Use Data is mandatory under the current legislation (Regulations 1107/2009, 2022/2379 and 2023/564)[15]. Pesticide use data will have to be gathered electronically and transferred to Eurostat, covering 75% (or, in the best case, 95%) of the total utilised agricultural area of the EU. The Farm Sustainability Data Network (FSDAN) should include data on pesticide use and IPM measures linked to robust indicators, to allow for effective benchmarking and sustainability monitoring. Best available IPM practices should set the standard for IPM implementation across Europe.

4) Support for farmers and farm workers in the transition

The EU must ensure that farmers and farmworkers are adequately supported in transitioning away from harmful pesticides. Needed measures include:

- ***Redirecting Common Agricultural Policy funding:*** The EU must ensure that the CAP funding is used to support farmers in reducing pesticide use, through the adoption of agroecological practices, and to contribute to the preservation and restoration of ecosystem functioning and the regeneration of rural areas. Public subsidies should be conditional on reducing pesticide use and properly implementing IPM. Member States can update their national strategic plans every year and make changes in their

[13] UBA 2023 - Misleading calculation: EU plans for pesticide reduction at risk, The Conversation: Plan Ecophyto : tout comprendre aux annonces du gouvernement

[14] ECA, 2024 - Special report Common Agricultural Policy Plans Greener, but not matching the EU's ambitions for the climate and the environment, ECA, 2023 - Sustainable use of plant protection products: limited progress in measuring and reducing risks

[15] Regulations 1107/2009, SAIO: Regulation (EU) 2022/2379

allocation of funds to align with reduction objectives. The next revision of the CAP will be critical to achieving these goals, with the need to move away from area-based payments, rewarding instead practices that provide benefits to ecosystems, while supporting farmers who need it the most.

- ***Ensuring fair incomes & better working conditions:*** The EU must ensure that farmers and farmworkers receive fair prices and a decent standard of living. This should include an urgent review of the European Directive on Unfair Trading Practices and the Common Organisation of the Markets regulation to ensure that farmers can earn fair revenues from the market and are not systematically forced to sell their products below production costs.
- ***Strengthening trade regulations:*** The EU's reduction of pesticide use must be accompanied by strong trade regulations that prevent unfair competition from products that do not respect EU rules. An immediate ban is needed on the EU's exports of hazardous pesticides banned in the EU that endanger people and the environment in other parts of the world. Also the Strategic Dialogue report underlines that the EU should end the practice of unethical double standards, and that Member States should stop exports of within the EU banned hazardous pesticides to countries with less stringent regulations. Moreover, we want to highlight that the EU should ban the import of products containing residues of pesticides banned in Europe. This is essential to eliminate toxic residues in imported food and create fairer competitive conditions for EU farmers.
- ***Ensuring better recognition of occupational diseases:*** Agricultural workers must be entitled to official documentation detailing the pesticide used during their work activity. This documentation would allow farm workers who fall sick from pesticide exposure to facilitate the proof that the disease is linked to their professional activity. Across the EU, occupational diseases caused by pesticide exposure should be recognised as such by the social security systems and be compensated appropriately.
- ***Better protection of farm workers against pesticides:*** Farm workers need targeted measures to ensure better protection from pesticide exposure and handling. Those shall consider realities on the ground and ensure access to training, effective and adapted workers information, better enforcement of occupational health and safety measures, and promotion of prevention activities to raise awareness among workers.
- ***Adopting a redistributive pesticide levy:*** A pesticide levy is a first step to internalising the actual cost of the use of pesticides. It can contribute to funding for the environmental costs of pesticide use, indemnifying those who suffer health consequences from the use of pesticides and supporting farmers in the transition to sustainable practices[16]. This levy could be linked to the pesticide hazard, reducing the levy for low-impact pesticides. Implementing a pesticide tax at the national level is also an option, but a harmonised system across the EU would ensure a level playing field and have a more significant impact.

[16] Möckel, Stefan, et al. (2021). Pesticide tax in the EU: Various levy concepts and their impact on pesticide reduction"

Given the withdrawal of the SUR despite the urgent need and broad calls for pesticide reduction, including through two European Citizens' Initiatives, it is of the utmost importance for the EU to increase its efforts to effectively implement existing legislation and take ambitious steps towards pesticide reduction, ensuring that pesticides are used only as a very last resort. Aligning with the Farm to Fork objectives and the post-2020 Global Biodiversity targets must remain a priority of this new EU mandate.

The time for delay is over - the EU must act with urgency and ambition to protect the health and well-being of citizens, farmers and farmworkers, the health of our biodiversity and ecosystems, and lead the way towards more sustainable food systems without harmful pesticides.

Signatories:

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Quercus ANCN
Health and Environment Alliance (HEAL)
IFOAM Organics Europe
Fair Trade Advocacy Office
ISDE, International Society of Doctors for Environment
Journalists for Human Rights
Wen (Women's Environmental Network)
Swedish Society for Nature Conservation (SSNC)
Eco Hvar
Ecobaby Foundation
Compassion in World Farming EU
Lipu BirdLife Italia
Natuur.koepel vzw
Hogar sin Tóxicos
Health and Environment Justice Support (HEJSupport)
Natuurpunt Brugs Ommeland
VIA PONTICA FOUNDATION
Natuurpunt De Bron vzw
Natuurpunt Westland
Groen Ieper

Jesuit European Social Centre
Broederlijk Delen
Pestizid Aktions-Netzwerk e.V. (PAN Germany)
Vogelbescherming Nederland / BirdLife The Netherlands
Landschapsvrijwilligers Ieper
SAFE – Safe Food Advocacy Europe
Umweltdachverband
CEEweb for Biodiversity
ACU - ASSOCIAZIONE CONSUMATORI UTENTI (Consumers Users Association)
Deutsche Umwelthilfe (Environmental Action Germany)
Mouvement Écologique
Hnutí DUHA - Friends of the Earth Czech Republic
Slow Food
Natagora
Corporate Europe Observatory
Veblen Institute for economic reforms
Bond Beter Leefmilieu
foodwatch International
Community Hygiene Concern
Bulgarian Society for the Protection of Birds
PAN Italia
Ecologostas en Acción
ISDE Medici per l'Ambiente Italy
Care-act-terre
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Dutch Butterfly Conservation
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EIS Kenniscentrum Insecten
Child Rights International Network (CRIN)
Friends of the Earth Malta
Soortennl
Nature & Progrès
Friends of the Irish Environment
Earth Trek (Zemljane staze)
ECOCITY
GLOBAL 2000 - Friends of the Earth Austria
BIOM Association
Natuurmonumenten
Natuur & Milieu
Agroecology Europe
ARCHE NOAH
Natuur en Milieufederatie Zuid-Holland
The Polish Society for the Protection of Birds (OTOP, BirdLife Poland))

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