

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

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- 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)
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- 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

EU and International organisations

Agroecology Europe	Feedback Global
ARC2020	FIAN European Sections
Biodynamic Federation Demeter International	Friends of the Earth Europe
BirdLife Europe and Central Asia	Greenpeace
Client Earth	Health and Environment Alliance (HEAL)
Compassion in World Farming EU	IFOAM Organics Europe
Corporate Europe Observatory	Navdanya International
European Environmental Bureau (EEB)	PAN Europe
European Federation of Water Services (EurEau)	Slow Food Europe
European Professional Beekeepers Association	

National organisations

Arche Noah	Latvian Ornithological Society (LOB)
ASEED Europe	Latvijas Dabas fonds (Latvian Fund for Nature)
Asociacion Balear de Apicultores (Bee keepers association of the Balearic Islands)	Les Amis de la Terre Belgique
Asociación Bee Garden	Lipu
AssoBio	Mouvement d'Action Paysanne
Biom Association	NABU Germany
Birdlife Austria	NOAH - Friends of the Earth Denmark
Bond Beter Leefmilieu	Ogólnopolskie Towarzystwo Ochrony Ptaków
BUND e.V. -Friends of the Earth Germany	Oost West Centrum vzw
Bündnis für eine enkeltaugliche Landwirtschaft e.V.	Pestizid Aktions-Netzwerk e.V. (PAN Germany)
Centar za životnu sredinu - Friend of the Earth Bosnia and Herzegovina	Plataforma Transgenicos Fora
DOF BirdLife	Save Our Seeds
Earth Thrive	Slow Food Nederland
Eco Hvar	Slow Food Italy
Ecologistas en Acción	Slow Food Germany
Entraide et Fraternité	Sociedade Portuguesa de Entomologia
France Nature Environnement	The Greens Movement of Georgia - Friends of the Earth Georgia
Friends of the Earth Cyprus	Umweltinstitut München
Génération Futures	Voedsel Anders
Greenpeace Belgium	Voedsel Anders Nederland
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Hogar Sin Tóxicos (Spain)	WECF France
ImPAACTe - Pour une politique agricole et alimentaire wallonne de la transition écologique	Werkgroep Natuurlijk Imkeren
Inter-Environnement Wallonie	WWF Italia
ISDE Italy, Associazione Medici per l'Ambiente	ZERO - Associação Sistema Terrestre Sustentável
Justice Pesticides	Zukunftsstiftung Landwirtschaft

