# FOR AN AMBITIOUS PESTICIDES REGULATION THAT PROTECTS PEOPLE, BIODIVERSITY AND ECOSYSTEMS

## JOINT STATEMENT – OCTOBER 2023

We, the undersigned already more than 75 organisations, representing environment, health and consumers organizations, drinking water suppliers, farmers and agricultural workers, call upon all EU Member States and Members of the European Parliament to support and adopt a strong Sustainable Use of Pesticides Regulation (SUR) without further delays. Securing robust and coherent provisions in the SUR is urgent and essential to protecting farmers', farmworkers' and citizens' health, tackle the biodiversity crisis, the pollution of aquatic and other ecosystems, and support the much-needed transformation towards resilient food systems.

The need to significantly reduce pesticide use has been stressed by the scientific community, and repeatedly called for by EU citizens. Less than a year before the 2024 EU elections, people across the EU expect from decision-makers to better protect their health and nature.

IPM has been a legal requirement for farmers since 2014 (Directive 2009/128/EC), but implementation has failed. The SUR Regulation is essential to address the weaknesses of the 2009 Directive on the Sustainable Use of Pesticides and ensure that all EU Member States play their part in ensuring a sustainable future for farmers, citizens and the environment.

For the SUR to deliver on health and environmental protection, we specifically ask you to support the following ten priority demands (see also the Annex for further details):

**Support binding EU and national reduction targets** to reduce by at least 50% the use and risk of chemical pesticides by 2030, and to reduce by 100% the use of more hazardous pesticides by 2030. More than 1 million citizens across Europe call for phasing out the use of synthetic pesticides by 80% until 2030, starting with the most hazardous, to become 100% free of synthetic pesticides by 2035. The binding reduction targets should be set also for wholesalers and retailers, to make sure the whole food chain is engaged and contributes to reaching the pesticide reduction goals.

**Support and preserve binding and ambitious implementation of Integrated Pest Management (IPM) and crop-specific rules**. This requires setting a clear definition of hierarchical IPM steps from general agroecological practices to more crop-specific protection methods, with chemical pesticides being used as a very last resort. IPM should be applied on 100% of utilised agricultural area. Effective and enforceable IPM crop-specific rules have to be in place for at least 90% of the utilised agricultural area. A clear, directly nationally binding framework is a prerequisite for the SUR to lead to effective changes in agricultural practices, and decrease pesticide dependency.

**Replace the Harmonised Risk Indicator 1**, which is highly unfit for purpose, and **strengthen monitoring and reporting requirements**. It is essential that the used indicators allow for a realistic and correct evaluation of the reduction of pesticide use and risk over time. At the same time, regular public reporting of pesticide usage - crop and regional-specific - as well as mandatory monitoring of pesticides and their impact in/on different matrices (soil, water, air, biodiversity, indoor dust, humans) should be included in the SUR, using science-based and robust monitoring indices.

**Ban pesticide use in sensitive areas**, to protect human health, the environment and ecosystems. By way of derogation, in case all non-chemical IPM measures have failed and the economic threshold for crop damage is exceeded, low-risk non-synthetic and low-risk biocontrol substances could be allowed in agricultural areas located in sensitive areas (not outside agricultural areas). Within these boundaries, low-input nature-inclusive systems, including organic agriculture, agroecology and agroforestry, can be stimulated in agricultural areas. Sensitive areas should include at least the areas listed in the Annex of this statement.

**Establish effective cultivated or uncultivated buffer zones around sensitive areas to protect citizens and biodiversity, with widths as wide as needed to effectively protect citizens and biodiversity, and of minimally 100 m**. Cultivated or uncultivated buffers must also be established around all waterways, houses and gardens. Research shows that pesticides are found at very far distances from where they are applied, on children's playgrounds (1), in indoor dust (2) and nature areas (3). For example, research (3) shows that the number of pesticide residues in insects in nature areas is related to the proportion of agricultural production in a radius of 2,000 m. Measures, in the form of bufferstrips, need to be taken to also effectively protect untreated fields and pastures and organic fields from contamination with (other) pesticides.

1. Linhart et al. 2019. Pesticide contamination and associated risk factors at public playgrounds near intensively managed apple and wine orchards
2.The sprint towards a sustainable future - Wageningen University
3. Brühl et al. 2021. Direct pesticide exposure of insects in nature conservation areas in Germany

**Ensure coherence in the SUR, so that funds under the EU's Common Agricultural Policy (CAP) are used to support farmers in reducing pesticide use**, and to contribute to the preservation and restoration of ecosystem functioning and the regeneration of rural areas. The public funds of the CAP should be distributed in a fair way, supporting common goods and agricultural practices which reduce pesticides, protect citizens' health, preserve and restore the environment, while sustainably providing food. Member States can update their national strategic plans every year and make changes in their allocation of funds to align with SUR objectives. SUR obligations need to be reinforced in the specific objectives of the post-2027 CAP and in the conditionality of the CAP Strategic Plans regulation post-2027 (Regulation (EU) 2021/2115). Specifically IPM, crop-specific rules and reduction targets should be part of the conditionality in the post 2027 CAP.

**Ensure that truly independent advisory services are available** to support farmers in reducing pesticide use. The pesticide industry should be prohibited from providing any kind of advisory services to farmers.

**Ensure strong provisions on occupational and non-occupational health and safety duties** by employers. Introduce sanctions for employers not respecting IPM rules and the reduction targets, and an obligation to provide training on pesticide use to workers during paid working time. Ensure that information is publicly available on pesticide legislation, the potential risks for health and safety linked to the exposure to all used pesticides, and on procedures to report diseases linked to the use of pesticides. Ensure that agricultural workers and citizens can access official documentation reporting the type of pesticides used during their work activity/used in their surroundings to get (occupational) diseases properly recognised in cases of diseases linked to pesticide exposure.

**Implement Extended Producer Responsibility. In addition, introduce a risk-based EU-wide pesticide levy**, in a progressive way, and tailored to the toxicity level of pesticides, to finally implement the polluter pays principle. The costs of pesticide impacts are a huge burden to society and should no longer be borne only by people, water companies and farmers using no or minimal amounts of pesticides. Extended Producer Responsibility and a pesticide levy is a first step to internalising the true cost of the use of pesticides, and can contribute to funding for the environmental costs of pesticide use, indemnifying those suffering the collateral damages from the use of pesticides and supporting farmers in the transition to sustainable practices.

As in the Directive 2009/128/EC and Regulation EC no 1107/2009, **include the precautionary principle,** set out in Article 191 of the EU Treaty. EU pesticide legislation states that the objective of protecting human and animal health and the environment should take priority over the objective of improving plant production. Therefore, in case of scientific uncertainty regarding risks, the precautionary principle should be applied. This principle should remain key in the SUR, and should also ensure that Member States further restrict or prohibit the use of pesticides in specific circumstances or areas.

**We count on you to stand firmly for a more resilient food system and implement the pesticide reduction objectives of the Farm to Fork and Biodiversity Strategies for the benefit of citizens, farmers, biodiversity and agricultural areas across the EU.**

## SIGNATORIES

Agroecology Europe
Asociación Bee Garden
BeeLife
"Bihar" Kis-sárréti Civilek Társasága
Biokultúra Közép-Magyarországi Egyesület
BirdLife Austria
BirdLife Europe and Central Asia
Bond Beter Leefmilieu
Broederlijk Delen
Bund für Umwelt- und Naturschutz Deutschland e.V. (BUND)
Bündnis für eine enkeltaugliche Landwirtschaft e.V.
Caring Doctors
Cambiamo Agricultura
CEEweb for Biodiversity
Child Rights International Network
Clean Air Action Group (Hungary)
Consultants for Sustainable Development
Corporate Europe Observatory
Deutsche Umwelthilfe (DUH) - Environmental Action Germany
DOF Birdlife
Dutch Butterfly Conservation
Earth Trek / Zemljane staze
ECOCITY
Eco Hvar Croatia
Ecologistas en Acción
EDC-Free Europe
ELTE Nature Conservation Club
Euro Coop
EurEau
European Environmental Bureau (EEB)
European Federation of Food, Agriculture and Tourism Trade Unions (EFFAT)
Fauna Alapítvány
Federazione Nazionale Pro Natura
Feedback EU
Fondation pour la Nature et l'Homme
foodwatch
Friends of the Earth Europe
Générations Futures
Health and Environment Alliance (HEAL)
Hogar sin Tóxicos
HOLOCÉN Természetvédelmi Egyesület
International Association of Waterworks in the Rhine basin
ISDE, International Society of Doctors for Environment
Justice Pesticides
Kétker Közösségi Alapítvány
Lipu - Birdlife Italia
Magyar Környezeti Nevelési Egyesület
Magyar Természetvédők Szövetsége
MIRAMAP (Mouvement Inter-Regional des AMAP)
Mozgalom az Egészséges Város Környezetéért Civil Társaság
Munich Environmental Institute (Umweltinstitut München e.V.)
Natagora
Nature & Progrès
Natuur & Milieu
Natuurmonumenten

Natuurpunt
Ogólnopolskie Towarzystwo Ochrony Ptaków (BirdLife Poland)
PAN Europe
PAN Netherlands
Parkinson Vereniging
Pestizid Aktions-Netzwerk e.V. (PAN Germany)
Réseau Environnement Santé
Réseau National des Acteurs de l'Agroécologie du Togo (RéNAAT)
Romapis
Safe Food Advocacy Europe (SAFE)
Schweisfurth Stiftung
Slow Food
SoortenNL
Tavirózsa Association for Environmental Protection and Nature Conservation (Hungary)
Veblen Institute for economic reforms
Védegylet Egyesület
Velt
Voedsel Anders
Vogelbescherming Nederland
WECF France
WWF Romania
ZERO, associação sistema terrestre sustentável

# ANNEX

## INDICATORS

The Harmonised Risk Indicator 1 (HRI) to calculate progress towards the pesticide reduction targets is fundamentally flawed. As the methodology is based on quantities, without a link with the application rate/ha, risk of particularly toxic substances is heavily underestimated, while the risk of less harmful substances, that are used in larger quantities, is greatly overestimated. Moreover, in the current methodology, the banning or expiring of an active substance leads to an unreasonable high influence on the overall risk of the HRI1, due to the high risk weighting factor (WF) of 64 given to substances that are banned, while the categories don't allow for adequate diversification in risk of active substances. The indicator must therefore be timely replaced by a simple and robust indicator, accounting for the application rate/ha and indicating only effective reductions in the use and/or risk of pesticides.

The SUR should also provide for the development and eventual adoption of science-based risk indicators, based on ecotoxicity data and use data, to calculate and monitor trends in the ecological/environmental impact of pesticide use on different groups of organisms. In this regard, PAN Europe has suggested to include among more the TAT (Total Applied Toxicity) indicator. It is important that the pesticide indicators are systematically reviewed, in order to update them as needed according to progressive insights.

## SENSITIVE AREAS

It is crucial to protect sensitive areas, because of the importance of protecting public health, including vulnerable groups, the environment and ecosystems from exposure to pesticides. Only in cases where all non-chemical IPM measures have failed, and the economic threshold for crop damage is exceeded, low-risk non-synthetic and low-risk biocontrol substances could be allowed as a last resort on agricultural lands located in sensitive areas. Sensitive areas should include at least:

- **All public areas (parks, gardens, recreation and sports grounds, ...)**
- **Human settlements and all urban areas, including private gardens and kitchen gardens**
- **Areas frequented by vulnerable groups.**
- **Specific non-productive areas defined under GAEC8 (Regulation (EU) 2021/**

4. EU citizens more at risk from pesticides show new EU statistics - EU indicator on pesticides needs urgent reform - PAN Europe - August 2023; HRI 1: A risk indicator to promote toxic pesticides? - Global 2000; Towards sustainable plant protection - Umwelt Bundesamt - October 2022

5. A special higher weighting factor of 64 is given for banned active substances. When a substance is banned, it changes categories and receives, also retrospectively, a higher weighting factor. This gives the impression that the use and risk has strongly decreased, because the substance's weighting factor has, also retrospectively, increased through the change in category, while in practice nothing has changed.

- **Ecologically sensitive areas, including:**

  -All protected areas under Directive 2000/60/EC (with exception of IV 1 (iv)) and Directive 2020/2184 (Water protection).

  - All Natura 2000 areas (Directive 92/43/EEC and Directive 2009/147/EC), and any other national, regional, or local protected area reported by the Member States to the Nationally designated protected areas inventory (CDDA), where the conservation objectives relate to nature, biodiversity, or habitat protection.

  -Any area for which the monitoring of pollinator species establishes that it sustains one or more pollinator species which the European Red Lists classify as being threatened with extinction.

A buffer zone should also be implemented around all houses, gardens and other private properties where people live, work or play, which should be wide enough to effectively protect citizens from pesticide exposure. People, including vulnerable groups, often spend most of their time at home, where they should be protected from pesticide exposure.

All pesticide uses should be prohibited on all surface waters and within buffer zones of such waters, which should be wide enough to effectively protect surface waters from pesticide exposure. This buffer zone shall not be reduced by using alternative risk-mitigation techniques.

6. The 4 categories of active substances (AS) used for calculation of the HRI (*low-risk AS (WF1), all other approved AS (WF8), candidates for substitution AS (WF16), not approved AS (WF64)*) don't allow for a robust, science-based weighting of the various levels of toxicity of different AS. For example, a very large group of substances belongs to the 2nd class, while these substances have a wide variety of different levels of toxicity. At the same time, the 'not approved' substances can also include, for example, low-risk (or any) substances waiting for reapproval, which will then all receive the high weighting factor of 64.