



‘If biodiversity is to be restored in Europe and opportunities are to be created for crop production utilizing biodiversity-based ecosystem services such as biological pest control, there must be a Europe-wide shift towards farming with minimum use of pesticides over large areas’
(Geiger, F. et al. 2010)

PAN Europe’s remarks on the public consultation: ‘Sustainable use of pesticides – revision of the EU rules’

Pesticide Action Network (PAN) Europe and its members welcome the fact that the European Commission allows citizens to express their opinion on the upcoming revision of EU rules in relation to pesticide use. We especially welcome the fact that this public consultation recognises the potential of introducing a tax on pesticide use, a tool discussed in the 2007 Thematic Strategy on SUD, but for a long time forgotten.

On the other hand, however, we regret that this public consultation:

- Does not consult on 80% reduction target by 2030 towards a full phase out
- Nor makes any link to the Common Agricultural Policy currently in revision

Furthermore, questions should have distinguished between long- and short- term reflecting the ecological transition highlighted in both the Biodiversity and the Farm to Fork strategies.

Finally, we repeat that there is already enough evidence proving that the SUD is not delivering and that alternatives to pesticides already largely exist. We therefore question the need for this evaluation and impact assessment. To recover some of the lost time in the implementation of the SUD, we call on this evaluation to give an overview of the damage that pesticides cause to people and the planet and make a sector-specific overview of the many alternatives that can deliver already now. In this way, the impact assessment will respond on **how** to make this ecological transition happen, rather than whether this transition is necessary!

1. Why is the 80% pesticide reduction target and date for a full phase-out not considered?

PAN Europe and its members wonder why this public consultation has not been used to verify whether the 50% reduction target by 2030, as proposed in the European Green Deal, is enough.

One of the demands set forth in the 2017 European Citizens Initiative “Ban glyphosate and protect people and the environment from toxic pesticides” , which was signed by over 1,3 million people, included a call for a pesticide-free future. The current European Citizen Initiative “Save Bees and Farmers”, which calls on the European Commission to phase out all pesticides by 2035 has already been signed by over 440.000 people, signalling that the will for a pesticide-free future is growing among EU citizens. We therefore wonder why this public consultation does not consult on possible higher percentages for reduction targets on the path towards a pesticide free future by 2035.

2. Why no questions on the Common Agricultural Policy?

Every year, the European Union spends 60 billion euro within the Common Agricultural Policy (CAP). The CAP is currently being reformed, and it is therefore a perfect moment to make

updates. Despite the questionnaire on the SUD revision does ask a number of relevant questions, for instance on the idea of introducing pesticide taxation and promoting organic farming, there are no specific questions verifying whether the respondents believe that the CAP should be targeted to pay the agricultural sector to reduce pesticide use, and how.

In the CAP reform currently under discussion, the link to the SUD only engages farmers with soft measures like training, information and checking of pesticide equipment, or with voluntary measures. The CAP reform proposal currently being discussed completely set aside that the SUD makes it mandatory for farmers to apply Integrated Pest Management on their farms as from 2014.

A large number of civil society organisations have been calling on the European Commission to withdraw the CAP, as the CAP reform proposal currently under discussion was published before the European Green Deal was released, and therefore does not include a true reflection on how the CAP should target, among others, the 50% reduction targets on pesticides. So why are there no questions in this public consultation on the importance of the CAP in delivering pesticide use reductions?

3. Why no distinction between short to longer run reflecting the ecological transition?

The European Green Deal is calling for an ecological transition. This means a stepwise move from the unsustainable economic model in which we work *against* nature towards a sustainable model in which we work *with* nature by 2030. The European Commission is proposing to kick off this process by setting a number of quantitative use targets among others on pesticides.

In the questionnaire on the SUD evaluation, there are a lot of questions regarding how pesticide use reductions will influence, among others, farmers' income and citizens' health; however, it is not clear if these questions relate to short- or long-term transition.

In reality, pesticide use compromises natural pest control which, in turn, increases pesticide dependency. In agriculture, the vast majority of potential pests are controlled naturally by insect predators, such as ladybirds or parasitic wasps. When these beneficial insects are eliminated, through habitat loss or pesticide use, pest problems are seriously aggravated. To break this negative spiral, the agroecosystem needs to be diversified so that populations of natural pest enemies can regenerate and protect crops from pest damage. Largescale projects in the Netherlands and the UK have shown that conventional farmers who developed landscape structures targeted to insects providing natural pest control could reduce pesticide use by 90% while yields were maintained or even increased.

So, when a farmer makes the transition from applying pesticides towards applying alternatives, it will take time before the soil recovers and becomes fertile again. Also, it will take time before nature recovers. Therefore, it would have been more appropriate to consult on how to ensure a serious implementation of the SUD revision making it deliver towards the ecological transition over time. Further, as part of that, it would have been more appropriate to ask more specific questions regarding the many alternatives we already know are available, in order to be able to start mapping them and scaling them up, this way helping farmers to start working increasingly with nature, an approach that allows farmers to save money over time.