



Mr. PRATS MONNE  
Director General for Directorate on Health and Food Safety  
B-1049 Brussels  
Belgium

Brussels, 29 October 2015

**RE: National implementation of the Directive 2009/128/EC establishing a framework for Community action to achieve the sustainable use of pesticides**

Dear Mr Prats Monne,

We would like to start by congratulating you on your new appointment as Director General of DG SANTE.

We are writing to express our concern about the delayed publication of the report on the implementation of the EU Directive on the Sustainable Use of Pesticides (SUD) that the European Commission was due to submit to the European Parliament and the Council of Ministers on 26 November 2014.

We are aware that DG SANTE has taken some steps towards the publication of the report, namely by asking the Food and Veterinary Office (FVO) to prepare the '*Report on the evaluation of National Action Plans required under Article 4 of Directive 2009/128/EC establishing a framework for Community action to achieve the sustainable use of pesticides*'. Member State experts were informed about the FVO evaluation at the 15 July 2013 meeting of the Standing Committee on the Food Chain and Animal Health. However, the European Commission has neither published the FVO evaluation nor released or passed on its report to the European Parliament or the Council of Ministers.

The audits conducted by the FVO show that EU monitoring and guidance on the sustainable use of pesticides are highly needed. As a result of the two audits undertaken in Austria and Italy in 2015,<sup>1</sup> the FVO concludes that neither country has a '*system to verify that all professional users implement the general principles of IPM as required by Article 14 of Directive 2009/128/EC*'.

It goes without saying that an improved implementation of the SUD could provide concrete benefits in terms of public health and environmental protection. Consequently, the evaluation and a rigorous implementation of the Directive are of vital concern.

We therefore ask the European Commission to:

- publish the FVO evaluation and its report on the SUD implementation without further delay;
- incorporate the findings and recommendations of the FVO into its own report, so that the European Parliament and the Council can hold an informed debate on the issue;
- agree with the Parliament and Council the concrete actions to fully implement the SUD;

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<sup>1</sup> In 2015 the FVO published the following audit reports concerning the marketing and use of pesticides:  
Austria: [http://ec.europa.eu/food/fvo/audit\\_reports/details.cfm?rep\\_id=3480](http://ec.europa.eu/food/fvo/audit_reports/details.cfm?rep_id=3480)  
Italy: [http://ec.europa.eu/food/fvo/audit\\_reports/details.cfm?rep\\_id=3484](http://ec.europa.eu/food/fvo/audit_reports/details.cfm?rep_id=3484)

- follow up Member States actions to improve the implementation of the SUD, starting with the observations already made by the FVO in its audit reports

In view of the public interest in this matter we will make this letter available on our websites.

Yours sincerely,



François Veillerette  
President of PAN Europe



Jeremy Wates,  
Secretary General, EEB



Ariel Brunner  
Senior Head of Policy for Europe  
and Central Asia – BirdLife Europe



Jorgo Riss  
Director – Greenpeace European Unit

**PAN Europe** is a network of NGOs working to minimise negative effects and replace the use of hazardous chemicals with ecologically sound alternatives. We work to eliminate dependency on chemical pesticides and to support safe sustainable pest control methods. Our network brings together 35 consumer, public health, and environmental organisations, and women's groups from across Europe.

**Greenpeace** is an independent campaigning organisation that acts to change attitudes and behaviour, to protect the environment and to promote peace. We value our independence and do not accept donations from governments, the EU, businesses or political parties. **Greenpeace European Unit** is part of the international Greenpeace network with over 40 offices and about three million supporters. We monitor the work of the EU, expose deficient policies and challenge decision-makers to implement progressive solutions.

**BirdLife Europe** is a Partnership of nature conservation organisations in 47 countries, including all EU Member States, and a leader in bird conservation. Through its unique local to global approach BirdLife Europe delivers high impact and long term conservation for the benefit of nature and people. BirdLife Europe is the regional secretariat of BirdLife International.

**The European Environmental Bureau (EEB)** is a federation of about 150 environmental civil society groups based in more than thirty countries: most EU Member States, most candidate and potential candidate countries, as well as a few neighbouring countries. These organizations range from local and national to European and international. The EEB's office in Brussels was established in 1974 to provide a focal point for its members to monitor and respond to the EU's emerging environmental policy. The EEB's aim is to protect and improve the environment by influencing EU policy, promoting sustainable development objectives and ensuring that Europe's citizens can play a part in achieving these goals. EEB stands for environmental justice, sustainable development and participatory democracy.