

Comments on the Revision of the Sustainable Use of Pesticides Directive

April 2021

Intensive agricultural practices, including heavy pesticide use, are the main driver of the EU's collapsing biodiversity. The widespread use of pesticides is dangerously impacting Europe's ecosystems and human health, both directly¹ and through exposure to residues of neurotoxic pesticides and mixtures of pesticides². There is evidence that the excessive use of pesticides jeopardises productive agriculture, as the negative effects of some pesticides on beneficial pest predators and essential pollinators threaten crop yields.³ In addition, mixes of pesticides are accumulating in most European soils⁴, with negative impacts on soil microbial life and activity.⁵

The latest research from the US shows that, whilst pesticide use has gone down, more toxic pesticides for pollinators and aquatic invertebrates like neonicotinoids are being used, increasing the impacts on these trophic levels, undercutting the food chain.⁶ Whilst the EU has ostensibly banned neonicotinoids, they continue to be used via emergency authorisations.⁷ Yet, alternative solutions for crop protection against pests exist and have been tried and tested by many farmers⁸.

A mix of agronomic practices and landscape management are needed to shift to a nature-based model of pest management, building the natural resilience of agriculture systems to combat pests and diseases.⁹ Healthy ecosystems deliver essential services to agriculture – fertility, pest management, water management, pollination, etc. – but most agricultural ecosystems in the EU are strongly degraded¹⁰. EU policies must prioritise the restoration and protection of functioning ecosystems for their own sake, but also for a healthy and long-term sustainable farming system. Natural habitat is needed on farms to host populations of natural pest predators, and practices like crop rotation are needed to break the vicious cycle of resistance and pesticide dependency.

This underlines the need for a holistic shift to agroecological approaches that avoid harm to biodiversity while providing co-benefits for climate mitigation and adaptation¹¹. Policy and legislative action is urgently needed to boost the uptake of nature-based solutions across the EU.

¹ [Pesticides Action Network study reveals dramatic rise in global pesticides poisonings, 2020](#)

² "In 2015 more than 97% of food samples collected across the EU contained pesticides within the legal limits, with just over 53 % free of quantifiable residues (EFSA, 2017)." [European Environmental Agency, State of the Environment 2020](#)

³ [OECD Working Paper No. 155, 2020](#)

⁴ "Mixtures of pesticide residues in soils are the rule rather than the exception." [European Environmental Agency, State of the Environment 2020](#)

⁵ See for example [Mehjin et al, 2020](#) and [Vasickova et al, 2019](#)

⁶ [Schulz et al, 2021](#)

⁷ See for example this [PAN Europe report](#)

⁸ [PAN Europe & IBMA report Mapping IPM uptake in Europe](#)

⁹ See appendix to the RISE Foundation's 2020 report on crop protection, pp 9-10 https://risefoundation.eu/wp-content/uploads/2020/07/2020_RISE_CP_EU_Appendix.pdf

¹⁰ [European Environmental Agency, State of Nature in the EU 2020](#)

¹¹ [UN FAO, The Potential of Agroecology to build climate-resilient livelihoods and food systems, 2020](#)

The EU must facilitate a transition to agroecology, including through the Common Agricultural Policy

The Common Agricultural Policy (CAP), accounting for 1/3 of the EU's budget, must facilitate this transition. It is very disappointing that the CAP is not mentioned in this consultation, given its central role in influencing pesticides use. The exclusion of IPM from cross-compliance in the 2014-2020 CAP was criticised by the European Court of Auditors¹², who found that the lack of integration of the Sustainable Use of Pesticides Directive (SUPD) into the CAP was one of the main reasons for its failed implementation. Even worse, scientists have showed that the combination of direct payment instruments is keeping pesticides use above the level that they would otherwise be¹³. It beggars belief that this was not addressed in the 2-year transitional extension of the CAP nor in the proposals for the 2021-2027 CAP.

We therefore call on the European Commission to:

- Ensure the CAP delivers on the Green Deal objectives, including the target for a 50% reduction in the use and risk of pesticides. IPM must be a compulsory requirement for any farmer receiving public money by being included in conditionality, and robust indicators on both the use and risk of pesticides are direly needed to measure compliance. Anything less would fall drastically short of the promised new performance-oriented approach of the CAP.
- Prioritise knowledge exchange and upskilling in agroecological practices among farmers, by ensuring that CAP-funded advisory services are well-funded, fully trained in agroecological pest management, and independent of economic interests. In addition, EU-funded research must contribute to the agroecological transition and prioritise farmer-led research for locally-adapted solutions.

The Sustainable Use of Pesticides Directive must be reinforced with binding targets and properly enforced

There is unequivocal evidence that the SUPD is not delivering, as pesticides sales in the EU are stagnating at high levels and NGOs¹⁴, the European Court of Auditors¹⁵, and the European Commission itself¹⁶ have highlighted the poor implementation of the SUPD since its entry into force. Yet, the SUPD could be a powerful tool to reduce pesticide use and risks, if properly implemented by Member States.

We therefore call on the European Commission to strengthen the rules and step up the enforcement of the SUPD, to pursue an agenda of shifting to agroecological pest management:

- Enshrine the Farm to Fork and biodiversity strategy targets of 50% reduction of use and risk of chemical pesticides, and the target of at least 10% of agricultural land being dedicated to high-biodiversity areas and landscape features (a.o. buffer strips, rotational or non-rotational fallow land, hedges, non-productive trees, terrace walls, and ponds) in the revised SUPD. While the former should be set at EU level and translated at national level according to national circumstances (taking into account past efforts and potential for cost-effective reductions); the latter must apply at farm level across the EU.

¹² [Special report 04/2014](#)

¹³ [Brady et al, 2017](#)

¹⁴ See for example this [PAN Europe report](#) on the National Action Plans.

¹⁵ [Special Report 05/2020](#)

¹⁶ See this [2017 report](#) and this [2020 report](#) to the European Parliament and the Council.

- Step up implementation and enforcement of the SUPD, especially on IPM, through requiring clearer and more enforceable definitions of IPM in Member States' National Action Plans (NAPs). Step up controls, sanctions and infringements on IPM standards and illegal use.
- Ban certain substances and practices, such as aerial spraying and seed-coating, and take measures that will stop the abuse of emergency authorisations.
- Introduce a pesticides tax.
- Ensure that the SUPD applies to all types of farms: conventional, small, organic. NAPs should encourage the use of innovative practices to support them to implement nature-based pest management.
- Improve the indicators on pesticides to cover use and hazard of pesticides, not just sales, and improve the data on environmental impact, especially on water, soils and species. Require NAPs to set proper indicators & monitor farm-level uptake of IPM practices (ie. use of non-chemical practices) e.g. rotation, varieties, space for nature.
- Establish obligations for Member States to have a nationwide % of no spray zones, with priority to Natura 2000 areas.