

Ms Ursula von der Leyen, President of the European Commission

Mr Frans Timmermans, Executive Vice-President for the European Green Deal

Ms Stella Kyriakides, Commissioner for Health and Food Safety

Mr Janusz Wojciechowski, Commissioner for Agriculture

Mr Virginijus Sinkevičius, Commissioner for Environment, Oceans and Fisheries

Monday, 21 March 2022

Joint open letter: Publication of the revision of the legislation on the sustainable use of pesticides, on 23 March 2022.

Dear President von der Leyen, Executive Vice-President Timmermans, dear Commissioners Kyriakides, Wojciechowski and Sinkevičius,

Over the last weeks, we have witnessed numerous public interventions with alarming messages according to which the EU's "food security" is in danger because of the war in Ukraine. We are aware that international solidarity is and will be needed, but the situation in the EU with regard to "food security" and "food sovereignty" is different to the messages we have heard these last weeks.

As pointed out by the think tank IDDRI^[1], *"what is at stake - at least in the short term - is not Europe's "food sovereignty". Rather, it is Europe's ability to maintain an intensive livestock industry that is competitive in the face of international competition and able to provide consumers with low-cost animal products"*.

We warn about the misuse of the current situation to advance the political agenda of some private sector lobby groups with regards to the EU environmental and health commitments in general and pesticides in particular.

A new report by Corporate Europe Observatory^[2] sheds light on the lobbying tactics used by the pesticides industry, and relayed by other lobbies and political actors, to undermine and derail the EU's Farm to Fork Strategy, which includes a 50% reduction target in the use and risk of chemical pesticides by 2030. This attack is not new; the same actors tried to derail the Farm to Fork Strategy two years ago, using the Covid-19 crisis as an excuse^[3].

^[1] <https://www.iddri.org/en/publications-and-events/blog-post/war-ukraine-and-food-security-what-are-implications-europe>

^[2] <https://corporateeurope.org/en/2022/03/loud-lobby-silent-spring>

^[3] <https://corporateeurope.org/en/2020/04/dont-let-industrial-farming-and-corporate-lobbies-use-covid-19-crisis-defend-continued>

The Commission is expected to publish the proposal for revision of the directive on the sustainable use of pesticides (SUD) on 23 March. The text is expected to include legally binding reduction targets in the risk and use of chemical pesticides, in line with the Farm to Fork Strategy. Ahead of that, the Agriculture Council is discussing today on the SUD and last week EU Agriculture Commissioner Janusz Wojciechowski called for the planned environmental reforms to be postponed. He also asked for EU farmers not to be burdened with new obligations.

We recall that the SUD is not a new piece of legislation: it dates back to 2009. Its objectives are to promote non-chemical alternatives to pesticides and to reduce dependency on the use of chemical pesticides. According to this directive, integrated pest management (IPM), which means using chemical pesticides only if necessary after exhausting preventive, physical, biological or other non-chemical methods of pest control, has been mandatory for European farmers since 2014.

However as the Court of Auditors^[4], the European Parliament^[5] and the European Commission^{[6] [7]} have all pointed out, Member States (MS) have failed in their obligations with regards to applying these provisions.

The insufficient degree of progress in the implementation of the SUD in the last decade, both by MS and at farm level, is deeply troubling, as is the lack of commitment by MS to set ambitious reduction targets for the use and risk of chemical pesticides, and the misuse of the war in Ukraine to maintain the status quo.

On top of that, as PAN-Europe has exposed^[8], trade associations are using the current political situation to ask for a derogation on the EU Maximum Residue Limits (MRLs) for pesticides in imported food and feed products. This derogation would allow commodities that do not comply with EU safety standards to access the European market for six months.

In this context, it is worth reminding that there is an abundance of reasons, economic and moral ones included, why political decision makers must urgently protect citizens and the environment and move away from the use of synthetic pesticides:

^[4] https://www.eca.europa.eu/Lists/ECADocuments/SR20_05/SR_Pesticides_EN.pdf

^[5] https://www.europarl.europa.eu/doceo/document/TA-8-2019-0082_EN.html

^[6] https://ec.europa.eu/food/system/files/2017-10/pesticides_sup_report-overview_en.pdf

^[7] https://ec.europa.eu/food/system/files/2020-05/pesticides_sud_report-act_2020_en.pdf

^[8] [https://www.pan-europe.info/sites/pan-europe.info/files/css/Press%20Release/Letter_shameless%20instrumentalisation%20by%20industry%20of%20the%20Ukrainian%20conflict%20to%20maintain%20double%20standards_M\[60932\].pdf](https://www.pan-europe.info/sites/pan-europe.info/files/css/Press%20Release/Letter_shameless%20instrumentalisation%20by%20industry%20of%20the%20Ukrainian%20conflict%20to%20maintain%20double%20standards_M[60932].pdf)

- Recent scientific evidence shows that occupational exposure to pesticides has been linked to different types of cancer, Parkinson’s disease, cognitive impairment and respiratory health. Children’s early life exposure to pesticides while in the womb, via breastfeeding or their surrounding environment has also been linked to certain types of cancer and nervous system disorders^[9]. People living near agricultural or pesticide-treated areas can be affected too and consumers are exposed to pesticide residues in their food.
- The increasing scientific evidence tells us also of the harmful effects of pesticides and chemical cocktails on all ecosystems and on biodiversity. A 2022 ASC study warns that chemical pollution has passed safe limits for humanity, threatening the stability of global ecosystems upon which life depends^[10]. Scientists also warn of the combined effects of chemical pollution and climate change on biodiversity^[11].
- The estimated costs of chemical pesticides are much higher than their benefits. Societal costs in Europe were estimated at €2,3 billion in 2017, while industry profit was estimated at €0,9 billion that same year^[12].
- It has been proven that it is possible to significantly reduce pesticide use without affecting farms’ financial and productive performance^[13]. An EU agriculture operating under agroecological principles could improve the EU’s net contribution to the world’s market provisions of calories and proteins through the reduction in the consumption of animal protein and the relocation of plant protein production^[14].

^[9] Inserm Collective Expert Report. The effects of pesticides on health: new data (Inserm, 2021). Available at: <https://www.inserm.fr/wp-content/uploads/inserm-collective-expert-report-pesticides2021-executive-summary.pdf>

^[10] L. Persson et al., Environ. Sci. Technol. 56, 3, 1510-1521 (2022). DOI : [10.1021/acs.est.1c04158](https://doi.org/10.1021/acs.est.1c04158)

^[11] K. Groh et al., Environ. Sci. Technol. 56, 2, 707–710 (2022). DOI : [10.1021/acs.est.1c08399](https://doi.org/10.1021/acs.est.1c08399)

^[12] Bureau d’Analyse Sociétale d’Intérêt Collectif (Basic), Analyse de la création de valeur et des coûts cachés des pesticides de synthèse, (Basic, 2021). Available at : https://lebasic.com/wp-content/uploads/2021/11/BASIC_Etude-Creation-de-Valeur-et-Couts-Societaux-Pesticides_20211125.pdf

^[13] 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>

^[14] 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

- Exposure to pesticides has clear human rights implications. As Marcos Orellana, UN Special rapporteur on toxics and human rights reminded last week during a conference on pesticides held in Brussels^[15] « *All these impacts have adverse effects on the enjoyment of human rights; the rights to life, personal integrity, the right to water, the right to food, the right to health, the right to a healthy environment, and also the right to science, given the misalignment between scientific evidence and regulatory responses. Disinformation has become a lucrative business for many entities.* »
- EU institutions and national governments have the responsibility to act in the public interest and not in the interest of the private sector. It is worth reminding that 1,2 Million citizens, via the Save Bees and Farmers European Citizens' Initiative (ECI), have asked for an 80% synthetic pesticide reduction by 2030 and a complete phase out by 2035^[16].

Consequently, we urge the Commission to show vision and moral conviction by :

- Not postponing the much needed reform of the SUD.
- Making sure that the reform is ambitious enough and contains strong legally binding use reduction targets and other provisions in line with the civil society joint statement on the revision of the SUD^[17] and ensuring that farmers are supported in this transition.
- Making sure that all EU food and feed safety standards are upheld.
- Standing by its commitment to the Farm to Fork and Biodiversity Strategies, and transitioning away from our current agricultural model and its reliance on external inputs.

Yours sincerely,

International/European organisation

Jeremy Wates, Secretary General, EEB

Ariel Brunner, Head of Policy, BirdLife Europe and Central Asia

Lili Balogh, President, Agroecology Europe

Martin Dermine, Policy officer, PAN Europe

^[15] <https://eeb.org/exposure-to-pesticides-worldwide-has-clear-human-rights-implications/>

^[16] <https://www.savebeesandfarmers.eu/eng/>

^[17] <https://www.slowfood.com/wp-content/uploads/2022/03/SUD-Joint-Statement.pdf>

Kim Ressar, Project Coordination Sustainable Recreation Planning, Naturefriends International (NFI)

Noa Simón Delso, BeeLife

Eric Gall, Deputy Director, IFOAM Organics Europe

Olga Kikou, Head of EU Office, Compassion in World Farming

Genon Jensen, Executive Director, Health and Environment Alliance

Floriana Cimmarusti, Secretary General, Safe Food Advocacy Europe (SAFE)

Matthias Wolfschmidt - International Strategy Director, Foodwatch international

Jagoda Munic, Executive Director, Friends of the Earth Europe

Mikhail Durkin, Executive Secretary, Coalition Clean Baltic

Eoin Dubsky, Senior Campaign Manager, SumOfUs

Sascha Gabizon, Executive Director, Women Engage for a Common Future WECF International

Nina Holland, researcher, Corporate Europe Observatory

Claire Robinson, director, GMWatch

Anaïs Berthier, Head of EU Affairs, ClientEarth

Marta Messa, Director, Slow Food Europe

Laura Sullivan, Executive Director, WeMove Europe

Hannes Lorenzen, President, ARC2020

Arnaud Apoteker, General Delegate, Justice pesticides

National organisations

Koldo Hernández, Policy Officer in Ecologistas en Acción - Spain

Jos Ramaekers, chief policy officer, Natuurpunt - Belgium

François Veillerette, spokesman, Générations Futures - France

André Cicollela Président , Réseau Environnement Santé - France

Véronique Morreira, Présidente, WECF-France- France

Domantas Tracevičius, director, VšĮ "Žiedinė ekonomika" - Lithuania

Helmut Burtscher-Schaden, GLOBAL 2000 - Friends of the Earth Austria - Austria

Lorine Azoulai, porte-parole, Ingénieurs sans Frontières AgriSTA

Susanne Smolka, senior policy advisor, Pestizid Aktions-Netzwerk e.V. (PAN Germany) - Germany

Nicky Gabriëls, campaign and policy officer, Viva Salud - Belgium

Marc Fichers Nature et Progrès Belgique - Belgium

Karin Lexén, secretary-general, Swedish Society for Nature Conservation (SSNC) - Sweden

Jonas Jaccard, policy officer, SOS Faim - Belgium

Maureen Jorand, Head of food sovereignty and climate advocacy unit, CCFD-Terre Solidaire - France

Maria Staniszewska, Chairwoman Polish Ecological Club - Poland

Senka Šifkovič, policy officer, Umanotera, Slovenska fundacija za trajnostni razvoj - Slovakia

Fabian Holzheid, Political Director, Umweltinstitut München

Florian Schöne, Executive Director, Deutscher Naturschutzring - Germany

Benoit De Waegeneer, policy coordinator, SOS Faim - Belgium

Christian Pons, President, Union Nationale de l'Apiculture Française - France

Philip Kearney, Chair, An Taisce - the National Trust for Ireland - Ireland

Johanna Bär, Managing Director, Bündnis für eine enkeltaugliche Landwirtschaft e.V. - Germany

Annemarie Mohr, Office Director, Women Engage for a Common Future WECF e.V. - Germany

Dr. Niels Kohlschütter, Executive Director, Schweisfurth Stiftung- Germany

Tjerk Dalhuisen, kernteam Voedsel Anders network – The Netherlands

Leif Miller, CEO, NABU - the German Nature Conservation Union - Germany

Julie Potier, Executive Director, Bio consom'acteurs- France

Thomas Radetzki, Executive Director, Aurelia Stiftung - Germany

Teo Wams, director Nature Conservation, Natuurmonumenten – The Netherlands

Titia Wolterbeek, director De Vlinderstichting, chair SoortenNL – The Netherlands

Arnaud Schwartz, president, France Nature Environnement - France

Marjolein Demmers, Executive Director, Natuur & Milieu – The Netherlands

Claus Ekman, director, Green Transition Denmark - Denmark

Angelo Gentili, Head of the Agricultural office, Legambiente - Italy

Floris van Hest, Director Vogelbescherming Nederland - The Netherlands

Francisco Ferreira, president, ZERO - Portugal

Renaud Vivien, Responsable du service politique, Entraide et Fraternité – France

Regional organisations

Georges Cingal, General secretary, Federation SEPANSO Aquitaine

Sylvie Meekers, Executive Director, Inter Environnement Wallonie

Michel Besnard, president, Collectif de soutien aux victimes des pesticides de l'ouest

Andrea Schnattinger, Head of the Vienna Ombuds-Office for Environmental Protection