

To:

Agriculture Ministers of EU Member States

Commission President

Chairs of the European Parliament Environment, Public Health and Food Safety (ENVI), and Agriculture and Rural Development (AGRI) Committees

Cc:

Executive Vice-President for the European Green Deal, Commissioner for Health and Food Safety, and Commissioner for Environment, Oceans and Fisheries

Members of the European Parliament ENVI and AGRI Committees

Brussels, 8 December 2022

**Re: Urgent need to defend the proposal for a Sustainable Use of Pesticides Regulation (SUR) against attempts to weaken, postpone and withdraw it.**

Dear Ministers,

Dear Commission President,

Dear Chairs of the European Parliament ENVI and AGRI Committees,

On behalf of the European Environmental Bureau, Europe's largest network of environmental citizens' organisations, I've been compelled to write to you after witnessing attempts by vested interests and some political decision makers to weaken, postpone<sup>[1]</sup>, and even withdraw<sup>[2]</sup> the European Commission's proposal for a Sustainable Use of Pesticides Regulation (SUR). I call on the European Commission, EU Agriculture Ministers and all political parties in the European Parliament to work towards the adoption of a strong SUR proposal and to resist the pressure from private interests to derail this urgently needed reform. This piece of legislation is of the utmost importance for protecting the environment and human health, making our society resilient to the twin climate and biodiversity crises, and securing the long term future of our agricultural sector.

What opponents seem to forget, whilst they attack the SUR proposal, is that much of its content is aimed at simply ensuring that existing EU law is implemented, for example by making it a Regulation. According to the current Sustainable Use of Pesticides Directive (SUD), from 2009<sup>[3]</sup>, Member States are required to reduce their dependence on the use of pesticides, minimising or prohibiting its use in sensitive areas, and implementing Integrated Pest Management (IPM) at farm level. Therefore, the lack of support for the proposal, and the voices proposing its withdrawal, can be seen as a refusal to comply with EU law. It is concerning that much of this opposition comes from the very institutions entrusted with upholding due legislative processes and decisions.

The pesticide use reduction target is one of the most heavily opposed parts of the SUR proposal, despite its feasibility. For example, the EU-funded research project IPMWorks<sup>[4]</sup> is engaged in achieving a 50% cost effective reduction in the use of pesticides only by applying IPM. Given that IPM

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has been mandatory for European farmers since 2014, a reduction in pesticide use should have already been reached if the SUD had been properly applied[\[5\]](#),[\[6\]](#).

The Agri-food industry often argues that it cannot comply with the SUR proposal as it is lacking a toolbox of measures. However, on 15 September 2022, the conference Developing a Farmers' Toolbox for Integrated Pest Management Practices from Across the Union took place in Brussels[\[7\]](#), and presented the results of several projects on IPM, including IPMWorks. Yet the Agro-industry still claims that what is asked of them under the SUR proposal is too difficult. It is also worth noting that many pioneering farmers are already successfully applying IPM, agroecology or organic farming in the European Union and across the world, disproving the claim that such practices are out of reach.

Occupational exposure to pesticides causes very serious illness to farmers[\[8\]](#). But the health of citizens in general, including children[\[9\]](#), is also increasingly threatened by pesticide exposure. By significantly reducing their use in EU agriculture, the health of European farmers and citizens would be better protected. Yet, despite the feasibility of what is proposed in the SUR, which environmental civil society groups do not consider ambitious enough, stakeholders in the agri-food sector, several EU Agriculture Ministers and some members of the European Parliament, oppose this reduction, and pesticide victims[\[10\]](#) are silenced. History will not be kind to those who, despite being presented with solutions, opted to systematically block them, upholding the status quo of wilful neglect of citizens' health for the benefit of short-term private interests.

Also silenced in the debate is the fact that food security in the EU is not threatened by the war in Ukraine. The "food security is in danger" argument continues to mislead political decision makers[\[11\]](#),[\[12\]](#). This is a false narrative that has been thoroughly debunked by experts, including Olivier De Schutter, UN Special Rapporteur on extreme poverty and human rights and Co-Chair of The International Panel of Experts on Sustainable Food Systems. As De Schutter has explained, high prices do not necessarily reflect a gap between supply and demand, and contrary to popular belief the world produces enough food to feed everyone[\[13\]](#). Instead, a dysfunctional mix of commodity markets and an over-centralised food system exacerbate food price peaks adding to the volatility of a fragile market, with some companies exploiting their market power[\[14\]](#).

Twisting or misusing important concepts like food security to block society's progress (in 2021 alone, the EU wasted 151 million tonnes of food, of which 89 million tonnes were wasted on farms[\[15\]](#)), is very worrying, as is the failure to listen to independent science[\[16\]](#).

We are hurtling towards an unlivable future, whilst empowered actors refuse to take the actions needed to avert it. Strong environmental measures and an ambitious SUR proposal are vital to curb the interlinked biodiversity and climate change crises and protect against a reduction in agricultural yields and heavy economic losses. Droughts and heatwaves have already reduced European yields on average by 9% and 7.3% between 1961 and 2018[\[17\]](#), and the effects will only get worse if we don't act now. As the FAO outlines, IPM can actually help tackle crop pests and diseases in a changing climate[\[18\]](#).

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The lack of biological control methods, and the need to wait until these are available, is another argument used by some stakeholders to boycott the SUR proposal. The drastic decline in biodiversity on farmland has led to a decline in nature's own pest control mechanisms. Bringing nature back to farmlands, e.g. through 10% high-diversity landscape features on farmland, and implementation of IPM would provide biological control to agricultural pests for free, along with many other benefits[19].

Last but not least, European decision makers should not forget, in the heat of the current debate, that the reduction and even phasing out of synthetic pesticides has been demanded by an overwhelming percentage of European citizens[20]. A clear example of this is the recently validated European Citizens' Initiative (ECI) Save Bees and Farmers, signed by more than a million European citizens[21]. In this light, alongside the arguments stated above, it would be very difficult to justify the withdrawal or further delay of the adoption process of the SUR proposal.

For all the above-mentioned reasons I call on the European Commission, EU Agriculture Ministers and all political parties in the European Parliament not to give in to pressure, to support a strong SUR proposal and reject any further delays.

Yours sincerely,



Patrick ten Brink  
Secretary General  
European Environmental Bureau (EEB)

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[1] The request for additional data on the SUR comes from the following countries: Austria, Bulgaria, Croatia, Cyprus, Estonia, Finland, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Poland, Portugal, Romania, Slovakia and Slovenia. - [POLITICO](#)

[2] "A last-minute climbdown from the Commission, in which it said it would water down significant parts of the bill, failed to sway the diplomats. The move will likely set the proposal back by months, or could even kill it if the bill isn't finalized by the end of the Commission's mandate in 2024." - [POLITICO](#)

[3] "Member States shall adopt National Action Plans to set up their quantitative objectives, targets, measures and timetables to reduce risks and impacts of pesticide use on human health and the environment and to encourage the development and introduction of integrated pest management and of alternative approaches or techniques in order to reduce dependency on the use of pesticides." - [Directive 2009/128/EC of the European Parliament and of the Council](#)

[4] The [IPMWorks project](#) covers 16 European countries, this is several pedoclimatic zones, and a representative number of crops, including orchards and vineyards.

[5] "In 2020 about 322 million kilograms of pesticide active ingredients were sold in the EU-27 countries (EC 202). The slight reduction 2019 and 2020 in comparison to previous years was caused by droughts and perhaps by delivery issues due to COVID-19 (see Lamichhane & Reay-Jones 2021). However, the volumes are still in a similar range as the years before." – [Locked in Pesticides](#)

[6] "A reduction of total pesticide use by amounts at national level is not necessarily associated with a reduced toxicity or reduced pesticide intensity." – [Locked in Pesticides](#)

[7] [Developing a Farmers' Toolbox for Integrated Pest Management Practices from Across the Union Conference](#) – Took place on 15 September 2022

[8] Our analysis suggests that the risk of prostate cancer is increased in several farming activities (cattle and hog breeding, grassland and fruit-growing) and for some tasks including pesticide use." – Study by Clémentine Lemarchand et al. entitled [Prostate cancer risk among French farmers in the AGRICAN cohort](#)

[9] "Epidemiological studies of paediatric cancers led to a conclusion of a strong presumption of a link between pesticide exposure during childhood as well as maternal exposure to pesticides during pregnancy (due to occupational or residential use) and the risk of certain paediatric cancers, in particular leukaemia and tumours of the central nervous system." – [Inserm Collective Expert Report The effects of pesticides on health: New data](#)

[10] "Suffering from Parkinson's disease or cancer, European farm workers experience inadequate recognition and failing compensation schemes." – [Le Monde](#)

[11] "In the past weeks and months we are hearing an increasing amount of misinformation around the nexus between agriculture, food production, and food security. It is worrying, because it misleads policymakers toward counterproductive decisions that can risk lives." – [Twitter thread](#) by [Dr Guy Pe'er](#)

[12] "However, agricultural policy-makers – like the EU ministers meeting on Monday – should not abandon sustainable farming practices just to increase grain production, a team of scientists argues." – [Potsdam Institute for Climate Impact Research](#)

[13] "But high prices aren't necessarily reflecting a gap between demand and supply. In fact, contrary to popular belief, we are not currently facing a global shortage of food – wheat harvests reached a record high in 2021, stocks are reasonable, and we know the world produces enough food to feed everyone." – [EURACTIV](#)

[14] "The dominant commodity traders in agriculture are the so-called ABCD Group (ADM, Bunge, Cargill and Louis Dreyfus). They cover 70-90 per cent of the global grain trade and profit from the uncertainty of financial players and supply shocks in the real economy." – [Social Europe](#)

[15] "The estimate for food waste in primary production is based on WWF UK's estimates of 150 million tonnes wasted in Europe and has been adjusted based on the population of EU Member States" – [Feedback EU](#)

[16] "The European Union has failed to listen to independent science and is not putting the health and safety of its citizens first." – [EEB Comment](#)

[17] "Droughts and heatwaves have already reduced European yields on average by 9% and 7.3% between 1961 and 2018" – [Food security fact sheet](#)

[18] "These practices relate to a number of key activities, particularly crop diversification; the improved efficiency in the use of nutrients and fertilizers and the minimization of nutrient losses; efficient water management; Integrated Pest

Management (IPM); and conservation agriculture, which encompasses an array of practices (diversification of crop production, reduced tillage, and almost constant soil cover) that serve to increase soil carbon". - [Crops and climate change impacts briefs by Food and Agriculture Organisation of the United Nations](#)

[19] "Nature, through its ecological and evolutionary processes, sustains the quality of the air, fresh water and soils on which humanity depends, distributes fresh water, regulates the climate, provides pollination and pest control and reduces the impact of natural hazards" - [The global assessment report on biodiversity and ecosystem services. Ipbes summary for policymakers.](#)

[20] We call on the European Commission to propose to member states a ban on glyphosate, to reform the pesticide approval procedure, and to set EU-wide mandatory reduction targets for pesticide use. - ECI [Ban glyphosate and protect people and the environment from toxic pesticides](#)

[21] To protect bees and people's health, we call on the Commission to propose legal acts to phase out synthetic pesticides by 2035, to restore biodiversity, and to support farmers in the transition. - ECI [Save bees and farmers](#)