



Does the CAP deliver on pesticide reductions?

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1. Who is PAN Europe



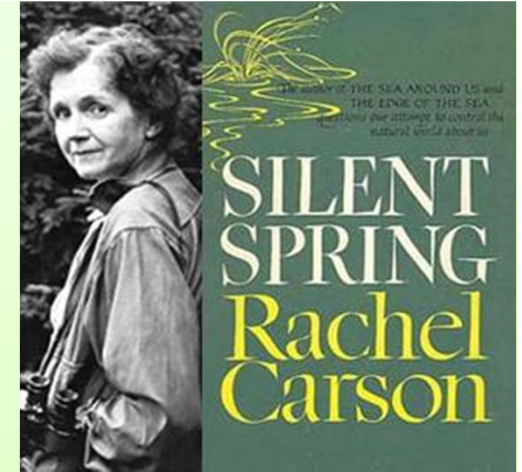
Pesticide
Action
Network
Europe

- PAN Europe is one of the 5 centers of PAN International
- 38 not-for-profit members in 26 European countries
- Working to replace use of hazardous pesticides with ecologically sound alternatives
- Brussels based with 5 part time employees

*Slogan from
the PURE campaign:*

Rather than wasting more years to agree on standard risk indicators, it is time to take action to protect environment, health and biodiversity.

2. Why pesticides?

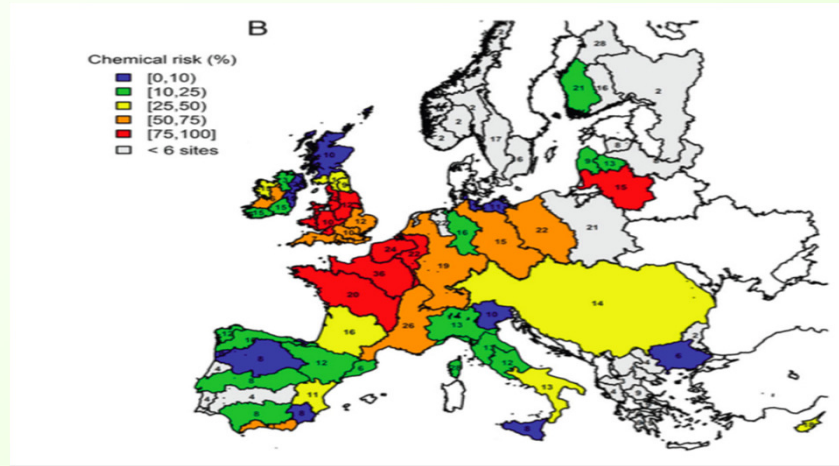


“The more I learned about the use of pesticides, the more appalled I became... What I discovered was that everything which meant most to me as a naturalist was being threatened, and that nothing I could do would be more important.”

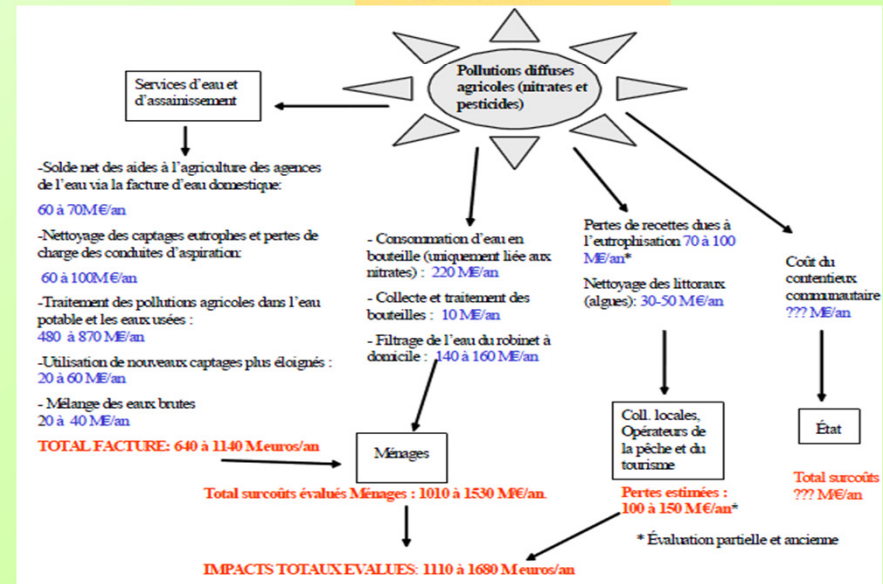
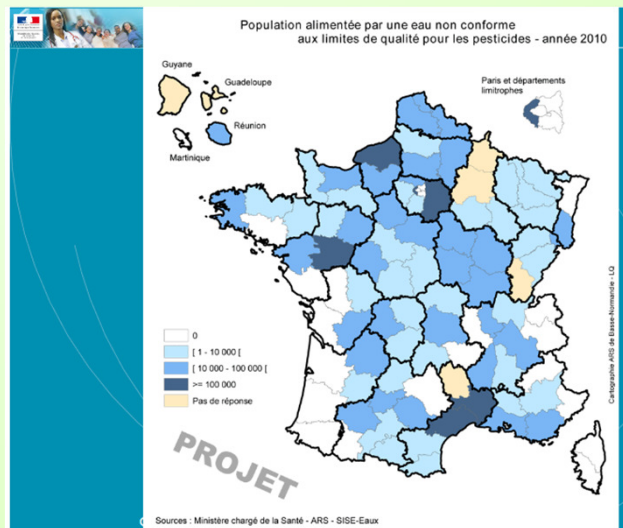
Rachel Carson, 1962

3. Evidence keeps growing

On the many negative consequences of pesticides

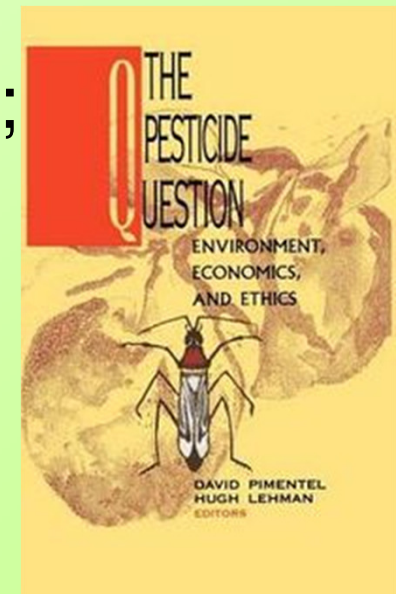


On the the costs of using pesticides



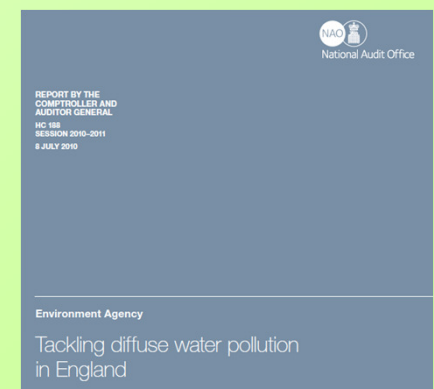
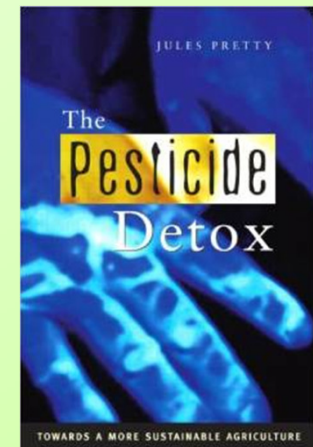
3a. Estimated annual economic losses caused pesticides in the USA

- public health, \$1.1 billion/year
 - pesticide resistance in pests, \$1.5 billion;
 - crop losses caused by pesticides, \$1.1 billion;
 - bird losses due to pesticides, \$2.2 billion; and
 - ground water contamination, \$2.0 billion.
- (Pimentel, 2009)



3b. Estimated annual economic loss caused by pesticides in the EU

- Studies in the UK and Germany US\$257m and \$166m, respectively, paid by sufferers of pesticide-related poor health, the environment and citizens (Pretty & Waibel, 2005).
- UK water companies spent £189 million removing nitrates and £92 million removing pesticides from their water supplies between 2004-2005 and 2008-2009 (National Audit Service, 2010) (+/- 350 M €)



4. Beyond the field

EU consumers do not want pesticides:

- Eurobarometer 314/2009, 70% of the respondents consider pesticides to be the chemicals posing most risk to the user
- Eurobarometer 354/2010, 72% of the respondents consider pesticide residues in fruit, vegetables or cereals to be a problem
- More and more buy organic, urban farming is booming, local production is in...

Bystander exposure is an increasing problem:

L'épandage de pesticides restreint près des écoles

Le Monde.fr avec AFP | 10.07.2014 à 05h54 • Mis à jour le 10.07.2014 à 07h06

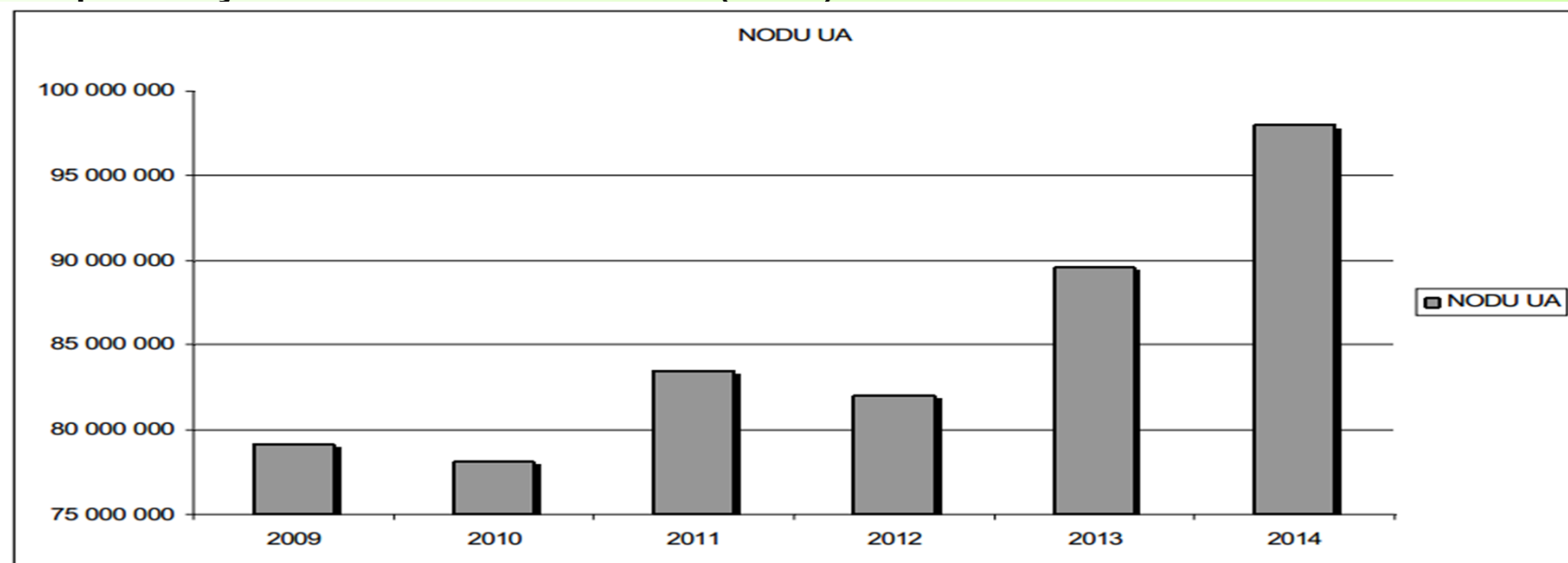


5. The overuse of pesticides

Studies from France:

- Jacquet F. *et al.* 2011: pesticide use can be reduced by 30% without consequences for yields and margins
- Lechenet et al 2017: pesticide use can be reduced by 42% in 59% of the (946) farms studied without consequences on yield

Frequency Treatment Index (TFI) in France 2009-2014



6. Why are farmers not reducing pesticide use?

- Farmers decision making is risk adverse
- Increasing (market) pressure pushes farmers to specialise, think short term and move away from working with nature
- Few tax rules to compensate negative externalities
- The CAP support is not fit for purpose on pesticide use

7. Pesticide use and CAP

INTEGRATED PEST MANAGEMENT | Working with nature

MS can encourage reductions of pesticide use e.g. by supporting voluntary integrated farming methods (incl. voluntary elements of Integrated Crop Management) through agri-environment-climate schemes.

Some MS are already doing so, it remains to be seen how the introduction of the general principles of IPM will influence baseline of such schemes.

Rural Development

Farm Advisory Systems

MS must offer farmers advises on rules under Cross Compliance but also on the SUDP and the WFD in particular aiming at reducing pesticide usage and informing about IPM.
It remains to be seen, what kind of advice, including on IPM, will be offered.

Insurance linked to yield

Dynamic approaches, increasing the IPM baseline

Mandatory crop rotation in the CAP

EFA: Ecological Focus Areas
GAEC: Good Environmental and Agricultural Practice
ICM: Integrated Crop Management

MS must implement ecological focus areas and the crop diversification scheme and promote good farming practices for pesticides reduction.

It remains to be seen how MS will implement the greening and if they will promote the non use of pesticide in the EFAs.

Greening of Direct Payments

MS can encourage reductions of pesticide usage, e.g. under the so-called Integrated Production as part of the environmental actions of the operational programmes.

Some MS are already doing so, it remains to be seen how the introduction of the general principles of IPM will influence baseline of such schemes.

Fruit & Vegetable Regulation

Cross compliance

MS must link the Regulation on Pesticides to CAP payments through Cross Compliance.

The GAEC provide also a tool for a better use of pesticides (buffer strips, etc.).

In the future certain aspects of the SUDP and WFD will become part of Cross Compliance after all MS have defined the obligations directly applicable to farmers.

It remains to be seen when and what kind of measures, including IPM.

IP: Integrated Production
IPM: Integrated Pest Management
SUDP: Directive on Sustainable Use of Pesticides
WFD: Water Framework Directive

Member States: MS Farmers
Pesticide Action Network

Agronomic practices

Monitoring

Physical control

Biological control

Pl. X

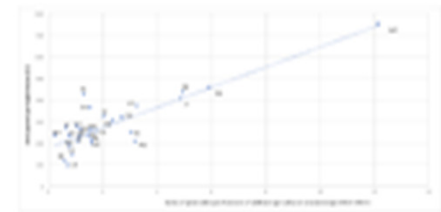


Inspiration note for the development of EU's Common Agricultural Policy: Why the CAP is broken on pesticides?

"The more I learned about the use of pesticides, the more appalled I became... What I discovered was that everything that meant most to me as a naturalist was being threatened, and that nothing I could do would be more important."
Rachel Carson, 1962

This reflection paper is in twelve points shortly questioning the CAP payments relating to pesticide issues. So far there is only a very limited mandatory instrument: pesticide free Ecological Focus Areas and Farm Advisory Systems which could help to encourage the needed transition towards low inputs farming. Time to open up this debate.

Almost 400,000 tons of active substance are sold in the EU to be sprayed on Europe's fields each year. Pesticide Action Network Europe (PAN Europe) has made a simple overview showing the link between pesticide sale and direct payments of the Common Agricultural Policy (1).



PAN Europe and its members dare to question if it is logical that tax payers' money is going to pay the highest direct payments per hectare to Member States with have the highest sale of pesticides per hectare?

7a. EU Directive 128/2009

Farmers are meant to apply IPM as from 2014 as a mandatory requirement of the SUD but

•**SUD is still not part of cross compliance:**



Sustainable use of pesticides: two steps forward, one step back

*In 2009 the European Parliament and the Council adopted a regulation on the placing of plant protection products on the regulation was to include the sustainable use of pesticides (and in particular integrated pest management) in cross-compliance (through SMR9) from 2014 onwards. However, in its proposal for a regulation on financing the CAP during in Regulation (EU) No 1306/2013), **the Commission explicitly excluded the sustainable use of pesticides and integrated pest management from the scope of cross-compliance by omitting the sentence that specifically referred** As a result, although the sustainable use of pesticides was to be included in cross-compliance from 2014, the current regulation now makes that timeframe uncertain. “*

7b. EU regulation 1107/2009

- **Farmers receive CAP direct payments even when using banned pesticides under 120 days use derogation:**

Between 2013 and 2016, over 1,100 emergency authorisations were granted by Member States

At least 62 emergency authorisations were granted by Member States allowing the use of bee-harming pesticides (PAN Europe et al report from 2017)

Table A

MS	Farmers	Seed association (S.A)	Pest. Company (P.C)	Both farmers and S.A	Trading company	Public body	Total
DE				2			2
FI	3				6		9
EE		5	2				7
IT			1				1
RO				20			20
EL	1						1
UK	1			2			3
BG			5				5
LT			2				2
LV				2			2
DK			3				3
HU		3					3
PT						4	4
Total	5	8	13	26	6	4	62
Statistics	8 (%)	13 (%)	21 (%)	42 (%)	10 (%)	6 (%)	

- **Farmers are allowed to store illegal pesticides on their farm it is for MSs to proof that farmers have used them before they can claim direct payment back (Ex. case from Denmark)**

7c. Other first pillar rules of relevance to pesticide use

- **Good Agricultural and Environment Conditions (GAEC):**

No coherence between EFSA's risk mitigation measures including buffer strips to protect water and what is included in GAEC by MS (ex. GAEC 1)

- **Greening:**

Ecological Focus Areas to become pesticide free as from 2018, but implementation rules again allows many loopholes

- **Farm Advisory Service (FAS):**

FAS do need to inform about SUD (and WFD) and as a result on sustainable use of pesticides, but....seems far from being an independent adviser

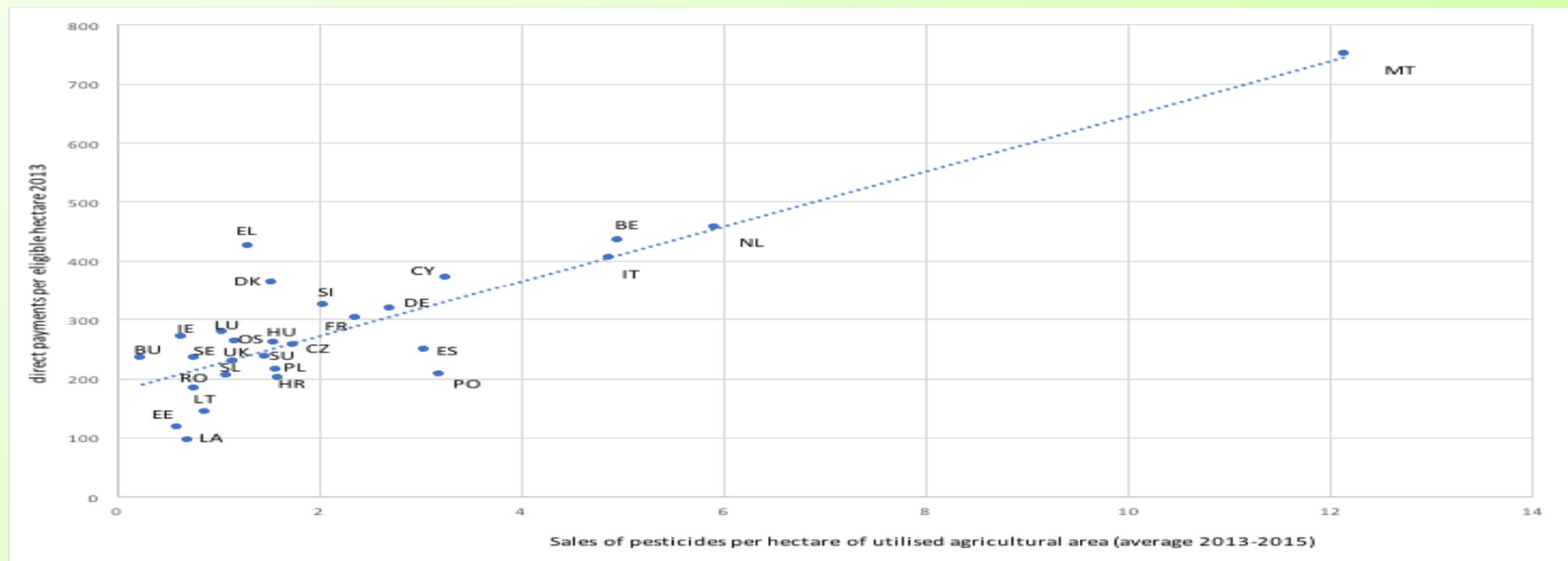


7. The CAP is not able to reduce farmers pesticide dependency!

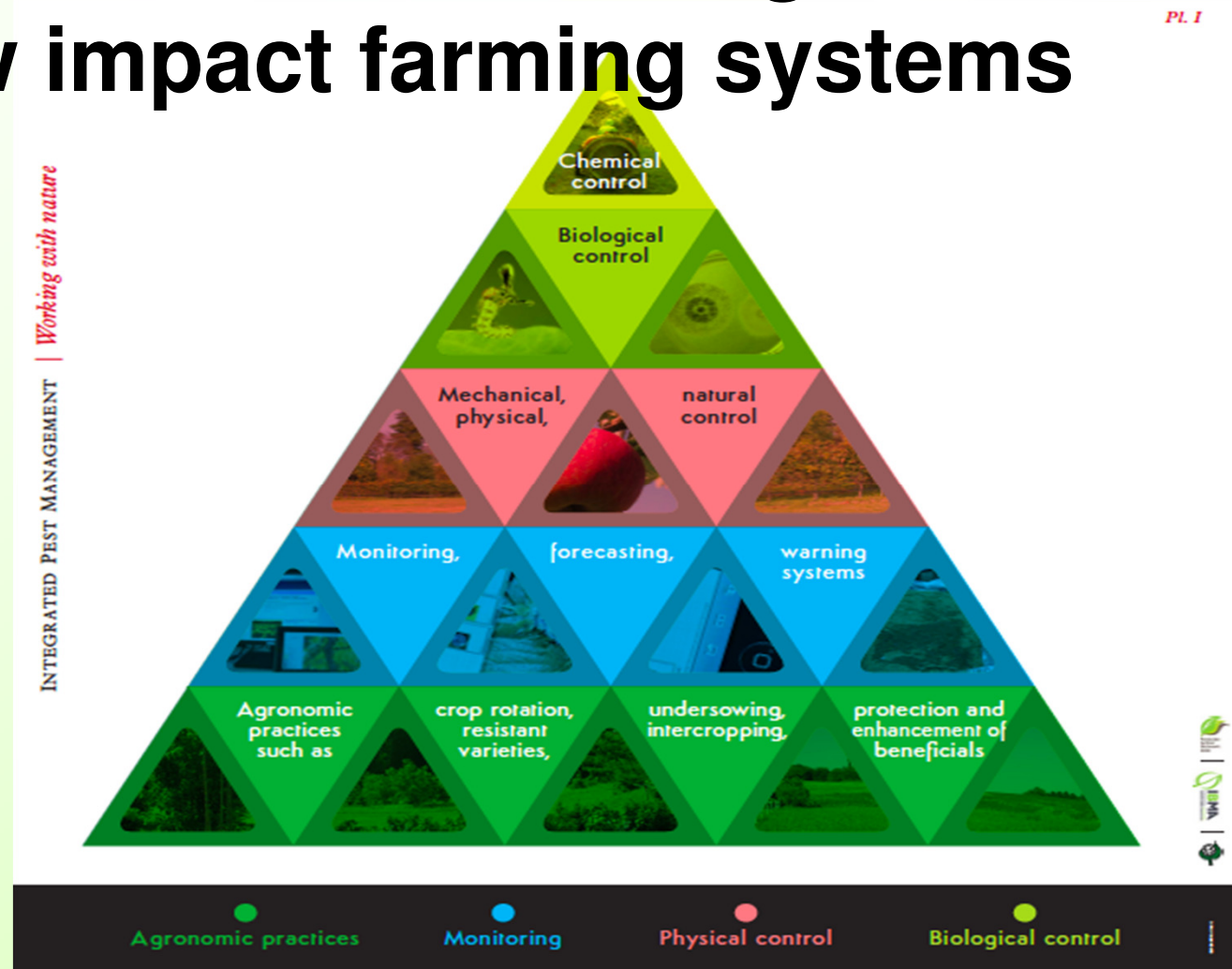


Almost 400,000 tons of active substance are sold in the EU to be sprayed on Europe's fields each year.

It is remarkable that the Member States receiving the highest direct payments/hectare = Member States selling most pesticides/hectare!



8. The real challenge for the 2020 CAP: promote the uptake of non chemical alternatives ensuring the transition to low impact farming systems



8a. 2020 CAP to accompany the farmers financially and technically towards low impact farming systems

1. Share some of the production risk for farmers willing to move towards nature based solutions, encouraging agronomic prevention rather than (chemical) cure (ex. mutual fund as risk management scheme in Veneto)
2. Be ready to finance potential extra costs for uptake of non-chemicals (ex. Napoli)
3. FAS to ensure independent advises: article 14.2 of SUPD: MS must ensure surveillance, monitoring, and advise (ex. Emilia Romagna) + Cooperatives to get actively involved (ex. Francia Corte)
4. Develop good pesticide indicators at farm (and at EU) level

9. Financing a 2020 CAP focused on low impact farming

- Unjustified CAP income support to disappear giving room for real environmental payments
- A third pillar for input taxation to finance CAP (the Danish taxation and 40% TFI reduction)?
- CAPs environmental payments (Greening, GAEC and Agri-Environmental Support) to become upgraded, coherent, ensure planning and longer term thinking also on input reductions (starting with SUDP) but also allow some flexibility to assist the farmer if he/she can proof logical steps have been taken
- Responsibility of MS and COM to be clarified, loopholes to be closed, including manipulation from chemical and seed industries



The current model has no future nor for farmers who are pushed to the limit economically but neither for nature!

A European wide study from 2010 shows:

‘Of the 13 components of intensification measured, the use of **insecticides and fungicides** had consistent negative effects on biodiversity. ..‘If biodiversity is to be restored in Europe ... there must be a **Europe-wide shift towards farming with minimal use of insecticides over large areas**’. Geiger, F. et al. 2010

Thank you for your attention