A Roadmap for a Pesticide Phase-Out

The issue of pesticide use in the EU and their consequences for health and the environment continues to be a growing concern, with widespread calls for action from citizens and scientists. Over a million EU citizens have called for a pesticide phase-out through the <u>Save</u> <u>Bees and Farmers European Citizen Initiative</u> and are still awaiting a response from the European Commission. Also the <u>Stop Glyphosate ECI</u>, various <u>Eurobarometer surveys</u>, a recent <u>IPSOS poll</u> and the <u>Conference on the Future of Europe</u> demonstrate the overwhelming support among Europeans for significantly reducing pesticide use. Moreover, there is widespread agreement within the scientific community that failing to reduce pesticide use is not an option. In July 2023, more than <u>6,000 scientists</u> issued a warning about the urgent need for drastic pesticide reduction to protect people and nature, and to ensure sustainable long-term food production.

Despite the well-documented risks pesticides pose to biodiversity and human health, the European Union has so far failed to tackle the issue of pesticide reduction. Although the Sustainable Use of Pesticides Directive (SUD) was introduced in 2009, pesticide sales and use in Europe have not decreased. Since then, the European Commission committed, as part of the Green Deal and Farm to Fork Strategy, to reduce the use and risk of chemical pesticides, as well as the use of the most hazardous pesticides, by 50% by 2030. However, the key legislation to achieve these goals - the Sustainable Use Regulation (SUR) - was abandoned in February 2024.

Back in February, over 125 organizations, including farm workers and farming organisations, issued a <u>joint statement</u> condemning the withdrawal of the SUR proposal. Recently, in less than 3 months more than 260 000 Europeans signed a <u>new petition</u> that urges the European Commission to prioritise pesticide reduction.

Biodiversity is collapsing at an unprecedented rate. Europe has seen a 60% decline in farmland bird populations¹ and at least 70% decline in insect populations², including pollinating insects and pest predators, while over 75% of the insect biomass disappeared from protected areas in 27 years³. Pesticides are a major driver of this decline, provoking cascading effects with potentially severe consequences to food production in the medium to long run⁴.

The widespread use of pesticides not only threatens ecosystems and biodiversity but also impacts human health and human rights, including the right of present and future generations

¹ Rigal, Stanislas, et al. (2023). <u>Farmland practices are driving bird population decline across Europe</u>

² Hallmann, Caspar A., et al. (2017). <u>More than 75 percent decline over 27 years in total flying insect biomass in protected areas</u>

Seibold, Sebastian, et al. (2019). <u>Arthropod decline in grasslands and forests is associated with landscape-level</u>

Møller, Anders Pape (2019). Parallel declines in abundance of insects and insectivorous birds in Denmark over 22 years

Ball, Lawrence, et al. (2023). The Bugs Matter Citizen Science Survey

³ Hallmann, Caspar A., et al. (2017). <u>More than 75 Percent Decline over 27 Years in Total Flying Insect Biomass</u> in Protected Areas

⁴ Finger, Robert, et al. (2024). Europe needs better pesticide policies to reduce impacts on biodiversity

to live in a clean, healthy, and sustainable environment⁵. Numerous studies have linked pesticide exposure to serious health issues, such as respiratory conditions, neurological disorders, cancers, and reproductive problems⁶. Agricultural workers, their families, and communities near farming areas face heightened exposure, while pesticide residues affect everyone through contaminated food and water. Pesticides degrade soil⁷ and water quality⁸, contribute to climate change, and accumulate in the environment, harming children's health and creating a toxic legacy that will harm the well-being, resilience, and rights of future generations⁹.

Alternatives to pesticide use exist and must be supported. Studies demonstrate that it is possible to feed Europe while phasing out pesticides¹⁰. Shifting to agroecological practices like intercropping and crop diversification increases biodiversity, improves soil health, and strengthens resilience to pests, diseases, and climate variability. These practices have also been proven to preserve crop productivity and farm profitability¹¹. Many farmers, as noted by Agriculture and Food Commissioner Christophe Hansen during his confirmation hearing in November 2024¹², wish to reduce their pesticide use and need support.

The conclusions of the Strategic Dialogue on the future of EU agriculture call for an end to "business as usual" in agriculture¹³. These conclusions emphasise the need to reduce external inputs like pesticides and highlight the importance of upholding existing legislation while finding effective ways to improve its enforcement. The necessity to shift to more sustainable and diverse agrifood systems that protect the environment and the health of food producers and citizens is central to the outcome of the Dialogue.

⁵ CRIN (2023). How can the EU better protect children from harmful pesticides - in Europe and beyond?
⁶ EEA (2023). How pesticides impact human health and ecosystems in Europe, Inserm (2021). Collective Expert Review on the Health Effects of Pesticides, Silva, Vera, et al. (2023). Pesticide residues with hazard classifications relevant to non-target species including humans are omnipresent in the environment and farmer residences, Navarro, Irene, et al. (2023). Pesticide Residues in indoor dust of farmworker households across Europe and Argentina, WHO (2021). Nature, Biodiversity and Health: An overview of interconnections, Figueiredo et al. (2019). Spatio-temporal variation of outdoor and indoor pesticide air concentrations in homes near agricultural fields, Dereumeaux et al. (2020). Pesticide exposures for residents living close to agricultural lands: A review, Bretveld et al. (2006). Pesticide use and menstrual cycle characteristics among premenopausal women in the Agricultural Health Study

⁷ Heinrich-Böll-Stiftung (2024). <u>Soil Atlas</u>, JRC (2024). <u>The state of soils in Europe</u>, Beaumelle et al. (2023). <u>Pesticide effects on soil fauna communities-A meta-analysis</u>, Gunstone et al. (2021). <u>Pesticides and Soil</u> <u>Invertebrates: A Hazard Assessment</u>

⁸ EEA (2024). <u>Improving health and resilience of waters in Europe</u>, EEA (2024). <u>Europe's state of water 2024: the</u> <u>need for improved water resilience</u>, <u>TFA in Water: Dirty PFAS Legacy Under the Radar</u>, <u>TFA the Forever</u> <u>Chemical in the Water We Drink</u>

⁹ UNICEF (2018). <u>Understanding-the-impact-of-pesticides-on-children.pdf</u>

¹⁰ Schiavo, Michele, et al. (2021). <u>An agroecological Europe by 2050: What impact on land use, trade and global food security?</u>

Tibi, Anaïs, et al. (2022). Protecting crops by increasing plant diversity in agricultural areas. Synthesis of collective scientific expertise

¹¹ Lechenet et al. (2017). <u>Reducing pesticide use while preserving crop productivity and profitability on arable farms</u>, Mouratiadou et al. (2024). <u>The socio-economic performance of agroecology</u>. A review. Van der Ploeg et al. (2019). <u>The economic potential of agroecology</u>: <u>Empirical evidence from Europe</u>

¹² Hearing of Christophe Hansen, Commissioner-Designate, 4 November 2024

¹³ Conclusions of the Strategic Dialogue on the Future of EU Agriculture, September, 2024

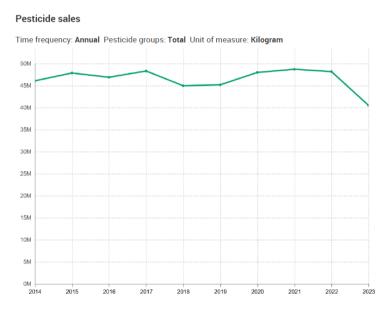
A swift and just transition to phase out pesticides and safeguard our environment, biodiversity and people's health must remain a top priority for the new European Commission. This goal should be central to the EU's Vision for Agriculture and Food, which will be presented within the first 100 days of the new EU Commission.

Since the proposal for a Sustainable Use Regulation (SUR) was abandoned by the European Commission in February 2024, here are our demands to make pesticide reduction a reality:

1) Full implementation of the Sustainable Use Directive 2009/128/EC

The current Directive on the Sustainable Use of Pesticides (SUD), established in 2009, aims to reduce the reliance on pesticides and their negative impact on human health and the environment¹⁴. The reduced risk and use should be achieved through ambitious national action plans (NAPs), complete and result-based implementation of Integrated Pest Management (IPM) and the adequate protection of specific areas. However, the national implementation of the Directive has been severely lacking, as underlined by different analyses, including assessments from EU bodies themselves¹⁵.

As a result of this insufficient implementation, pesticide use in the EU has not decreased - with pesticide sales remaining more or less the same over the last decade¹⁶ - leaving citizens and the environment largely unprotected.



Source: eurostat - pesticide sales

¹⁴ Directive 2009/128/EC

¹⁵ Implementation assessment on SUD by the European Parliamentary Research Service (2018) Report on the SUD of the European Commission (2020) Report on the SUD of the European Court of Auditors (2020)

PAN Europe, <u>Reducing pesticide use across the EU</u> - <u>Sustainable Use of Pesticides</u>, an EU Challenge: Very few Member States are engaging to reduce their use of pesticides

¹⁶ Special report 20/2024: Common Agricultural Policy Plans – Greener, but not matching the EU's ambitions for the climate and the environment

There is an urgent need for the effective implementation and enforcement of the SUD. This includes:

Ambitious result-based National Action Plans

The SUD mandates that member states adopt National Action Plans (NAPs), but analyses reveal a significant lack of ambition in these plans. The European Commission must ensure that all member states, in consultation with trade unions and civil society organisations, establish and effectively implement ambitious, result-driven NAPs. These plans should include clear quantitative reduction targets, ambitious timelines, specific measures, and meaningful indicators to assess the current state of pesticide use. Additionally, they must outline how the use of all pesticides, beyond those considered low-risk natural options, will be reduced nationally.

Effective implementation of IPM

Although the SUD made Integrated Pest Management (IPM) mandatory across the EU in 2014 (Art. 14, SUD), multiple analyses by EU bodies highlight the lack of effective IPM implementation since then. According to the SUD, member states must take all necessary measures to promote low-pesticide-input pest management, ensuring the effective implementation of mandatory IPM principles. This includes establishing sector- and crop-specific rules and guidelines, as well as high-quality, independent advisory systems. Crop-specific rules and guidelines should be based on the best available IPM measures and should be established by independent scientists and experts in cooperation with farmers, building on expertise developed in successful projects such as IPM Work. Effective implementation of IPM - where non-low-risk pesticides are used only as a last resort - is crucial in reducing pesticide use and risk.

Adopting a crop-by-crop approach

To implement a roadmap with specific objectives, milestones, and actions to eliminate the use of pesticides and implement IPM progressively, we should take a differentiated view of individual crops. The crop-by-crop approach can effectively reduce the amount of pesticides used without compromising agricultural productivity.

It is crucial to begin with the crops where pesticide reduction is the easiest to achieve and where reduction will have the most significant impact. Approximately half of Europe's arable land is allocated to cereal cultivation, with winter wheat and maize occupying the largest expanses. Cereals stand out as significant consumers of pesticides within the European Union. We can swiftly lessen pesticide usage by initiating pesticide reduction efforts with these crops.

Farmers cultivating sensitive crops for which alternatives are not yet cost-effective may require an extended transition period due to the unique challenges posed by specific pests or diseases associated with these crops. Nevertheless, even these agricultural products can progressively shift towards synthetic pesticide-free production, as organic farming methods have always been viable for all crops. This transition can be facilitated through focused research efforts, adopting resistant varieties and alternative pest management strategies.

Expanding independent advisory systems

Although the CAP and the SUD mandate establishing advisory systems to provide specialised guidance on IPM, most farmers lack access to independent, high-expertise advisory services. Instead, many farmers rely on advice from private consultants who are affiliated with pesticide corporations. Independent advisory systems, supported by sufficient public funding, are essential for helping farmers adopt IPM practices and implement pesticide alternatives. The Strategic Dialogue report emphasises that independent advisory services are crucial for accessing knowledge and innovation and calls for the widespread availability of dedicated training and independent advisory systems.

Protecting citizens, nature areas and water resources

The SUD includes several critical provisions that must be better implemented and monitored. This includes the requirement under Article 12 for member states to minimise or ban pesticide use in specific areas, such as those frequented by the general public or vulnerable groups, as well as in water and nature protection zones. Additionally, under Article 11, the SUD mandates that appropriate measures be taken to protect the aquatic environment and drinking water supplies from pesticide contamination. This includes establishing appropriately-sized buffer zones for the protection of non-target aquatic organisms and safeguard zones for surface and groundwater used for the abstraction of drinking water, where pesticides must not be used or stored.

Ensure coherence with the implementation of other environmental legislation

The full implementation and enforcement of all other existing and future EU legislation, such as the Water Framework Directive (WFD), the Habitats (HD) and Birds Directive (BD), the Nature Restoration Law (NRL) and the Soil Monitoring Directive (SD) is key. Current pesticide use impedes the requirements and objectives of the above-mentioned legislation. Ambitiously reducing pesticide use and risk is essential to ensure the objectives of these legislations are met.

2) Full implementation of Pesticide Regulation (EC) No 1107/2009

<u>Regulation (EC) 1107/2009</u> outlines the approval criteria for pesticides, stating that they must not harm human or animal health or have an unacceptable impact on the environment. However, the implementation of this regulation is marked by significant deficiencies. Current pesticide risk assessments and authorisations fall short of adequately protecting citizens and the environment from the harmful effects of pesticides. The Special Committee on the Union's authorisation procedure for pesticides (PEST) has highlighted severe shortcomings in the current risk assessment and authorisation processes, stressing the urgent need for reform. In 2023, only 15% of their recommendations had been fully implemented¹⁷. Shortcomings include:

¹⁷ <u>European Parliament resolution of 16 January 2019 on the Union's authorisation procedure for pesticides</u> (2018/2153(INI)), Gaps in the EU Pesticide Authorisation, PAN Europe, 2023

- The close involvement of the pesticide industry in the risk assessment process, creating conflicts of interest and undermining independent scientific evaluations¹⁸.
- A failure by policymakers to apply the precautionary principle which requires prioritising the protection of human health and the environment when risks are uncertain, as stipulated in EU legislation.
- Pesticides known or presumed to be toxic¹⁹ should be banned, but in practice, very toxic pesticides (CMR, EDCs) remain on the market for years.
- The chronic exposure of citizens and ecosystems/biodiversity to cocktails of pesticide, as well as to the combination with other chemicals, is not or insufficiently considered. Additionally, the risk assessment of co-formulants, added to active substances in pesticide products, is lacking.
- Critical exposure pathways, such as dermal absorption and inhalation, are not correctly or adequately assessed.
- Neurotoxic effects of pesticides, including links to diseases such as Parkinson's, are not thoroughly evaluated²⁰, despite expert warnings of a "Parkinson's pandemic" linked to pesticide exposure²¹.
- Current pesticide risk assessment does not protect biodiversity²².
- The "Maximum Residue Levels" (MRLs) permitted in food are based on calculations rather than robust risk assessments. These MRLs change over time, indicating that citizens are exposed to pesticide levels that are later deemed unsafe.

Regulation 1107/2009 and the <u>116 recommendations of The PEST Committee</u> must be fully implemented without delay.

3) Adequate indicators and pesticide data to measure pesticide use and risk

Registering pesticide use data is mandatory through Regulation 1107/2009. From the 1st of January 2026, pesticide use data must be registered electronically through the Implementing Regulation (EU) 2023/564. The SAIO Regulation (Regulation (EU) 2022/2379 on statistics on agricultural input and output) will make pesticide use data available from 2028.

Currently, there is a lack of systematic and detailed data on pesticide use, which makes it challenging to track the effectiveness of efforts to reduce pesticide usage. The existing indicators for pesticide reduction are insufficient to truly measure progress. To address this, the EU must ensure that the necessary indicators are developed and that pesticide use data is consistently collected, publicly available and easily accessible. This will allow for better monitoring and more transparent tracking of the reduction of pesticide use and associated risks.

¹⁸ Pesticide firms withheld brain toxicity studies from EU regulators, study finds

 ¹⁹ carcinogens, mutagens, toxic for reproduction, endocrine disruptors, neurotoxic, persistent bioaccumulative and toxic (PBT), very persistent and very mobile (vPvM) and persistent, mobile and toxic (PMT)
 ²⁰ EU citizens are not protected against neurotoxic effects of pesticides

²¹ Pesticides play a role in Parkinson's explosion, says Dutch expert, Bloem and Boonstra (2023). The inadequacy of current pesticide regulations for protecting brain health: the case of glyphosate and Parkinson's disease, Matsuzaki et al. (2023). Pesticide exposure and the microbiota-gut-brain axis, Diwan et al. (2023). Impact of Pesticide Residues on the Gut-Microbiota-Blood-Brain Barrier Axis: A Narrative Review, Gama et al. (2022). Chronic Effects of Dietary Pesticides on the Gut Microbiome and Neurodevelopment

²² PAN Europe (2024). License to Kill: an EU guideline with far-reaching consequences

Improving the indicators to measure pesticide reduction

The Harmonised Risk Indicator I (HRI-1) has been widely criticised for its misleading portrayal of pesticide reduction trends, including by experts such as the German Environment Agency UBA²³ and the Scientific and Technical Committee of the French National Adaptation Plan²⁴. The core issues with HRI-1 stem from its volume-based approach and reliance on non-scientific risk factors, which discriminate against less harmful substances that need to be used in more significant amounts. This misrepresentation of pesticide usage trends can obscure the reality of pesticide impacts, particularly when less harmful substances are involved.

Another particularly problematic feature of the HRI-1 is that when a pesticide is banned, the historical data for its use is retrospectively assigned a risk factor of 64. This artificially inflates the perceived reduction in pesticide use, creating a false sense of progress. As a result, the data presents an exaggerated drop in pesticide use, which misleads the public and policymakers about the effectiveness of efforts to reduce pesticide usage and risk.

The European Court of Auditors itself stated that the HRI methodology overestimates the risk reduction in the use of pesticides, underlining that sales of pesticides have remained relatively constant since 2011 and the need for more robust indicators²⁵. Despite long-standing criticism and EU institutions recognising that the indicator is unfit for purpose and needs replacement, the EU Commission has not proposed any changes to this indicator. It continues to use it to communicate misleading information on pesticide use trends and risk²⁶.

To address this, indicators for pesticide reduction should be significantly improved by considering the toxicity of pesticides, including their environmental toxicity, and by accounting for the area treated. Such improvements would ensure that the indicators reflect the actual environmental and health risks posed by pesticide use and provide a more accurate picture of progress towards pesticide reduction.

Strengthening monitoring and reporting requirements

The EU should ensure yearly public reporting of pesticide usage - crop, regional and local specific - as well as mandatory monitoring of pesticides and their impact on different matrices (soil, water, air, biodiversity, indoor dust and people), using science-based and robust monitoring indices.

²³ UBA (2023). <u>Misleading calculation: EU plans for pesticide reduction at risk</u>

²⁴ The Conversation: Plan Ecophyto : tout comprendre aux annonces du gouvernement

²⁵ ECA, 2024 - Special report Common Agricultural Policy Plans Greener, but not matching the EU's ambitions

for the climate and the environment, ECA, 2023 - Sustainable use of plant protection products: limited progress in measuring and reducing risks

²⁶ <u>EU Commission spreads unscientific information about pesticide reduction</u>

Ensure transparent access to pesticide use, IPM and monitoring data

It is essential to ensure public, digital, centralised and harmonised full access to pesticide use data and pesticide monitoring data. Registering and communicating Pesticide Use Data is mandatory under the current legislation (Regulations 1107/2009, 2022/2379 and 2023/564)²⁷. Pesticide use data will have to be gathered electronically and transferred to Eurostat, covering 75% (or, in the best case, 95%) of the total utilised agricultural area of the EU. Furthermore, other legislative frameworks (*e.g.*, Water Framework Directive) or projects/preparatory actions (e.g. INSIGNIA-Europe) are paid by public money to carry out pesticide monitoring data. Yet, these data are not publicly available, centralised or standardised at the EU level. This situation must change immediately in line with EU data rules²⁸.

The Farm Sustainability Data Network (FSDAN) should include data on pesticide use and IPM measures. The sustainability benchmarking system, a recommendation of the Strategic Dialogue on the Future of EU Agriculture, should include indicators on effective pesticide reduction and IPM indicators developed by experts. Comparative assessment of practices that reduce pesticides applied on farms across Europe is essential and should lead to wide implementation of ambitious IPM, based on best available practices.

4) Support for farmers and farm workers in the transition

The EU must ensure that farmers and farmworkers are adequately supported in transitioning away from harmful pesticides. Farmers and farmworkers need better and more secure livelihoods. If the climate and biodiversity crisis are not addressed, the challenges farmers and farm workers face will only worsen. The EU must focus on the real issues farmers face - the need for fair incomes and better working conditions - while funding and supporting farmers to phase out non-low-risk pesticides and switch to agroecological practices. Necessary measures include:

Redirecting Common Agricultural Policy funding

The EU must ensure that the CAP funding is used to support farmers in reducing pesticide use through the adoption of agroecological practices, and to contribute to the preservation and restoration of ecosystem functioning and the regeneration of rural areas. Public subsidies should be conditional on reducing pesticide use and properly implementing IPM. Member States can update their national strategic plans every year and change their allocation of funds to align with reduction objectives.

Public money should serve the public good, not sustain an agricultural model that harms farmers and nature. The budgets of the CAP should be made available and distributed fairly,

²⁷ <u>Regulations 1107/2009</u>, <u>SAIO: Regulation (EU) 2022/2379</u>

²⁸ Environmental Information - Directive 2004/35/EC, Transparency and sustainability of the EU risk assessment in the food chain - Regulation (EU) 2019/1381, Open Data - Directive (EU) 2019/1024, Implementing Regulation on High-Value Datasets - Regulation (EU) 2023/138, Data Governance - Regulation (EU) 2022/868, Harmonised rules on fair access to and use of data - Regulation (EU) 2023/2854, Interoperable Europe - Regulation (EU) 2022/868

favouring small and medium-scale farms, to support the transition to an agricultural model capable of preserving and restoring the environment while maintaining its ability to provide food and create jobs.

The next revision of the CAP will be critical to achieving these goals. The Strategic Dialogue on Agriculture also highlights the need to redirect CAP funding. The Dialogue's report calls for a more targeted allocation of CAP funds, moving away from area-based payments and instead rewarding and incentivising practices that provide ecosystem benefits while offering socio-economic support for farmers who need it the most.

The Dialogue's conclusions also call for creating a new sustainability benchmarking system for agriculture and food systems. This system should measure each sector and farm's progress towards sustainability objectives (e.g., biodiversity conservation, pollution reduction), using scientifically sound indicators.

Ensuring fair incomes & better working conditions

The EU must ensure that farmers and farmworkers receive fair prices and a decent standard of living. This should include an urgent review of the European Directive on Unfair Trading Practices and the Common Organisation of the Markets (CMO) regulation to ensure that farmers can earn fair revenues from the market and are not forced to systematically sell their products below production costs. If prices were better aligned with production costs, it would significantly improve farmers' income, allowing for a more significant portion of the CAP budget to be redirected towards supporting farmers in transitioning to agroecology and other sustainable farming practices while also providing safer and more attractive working conditions.

Strengthening trade regulations

The EU's reduction of pesticide use must be accompanied by strong trade regulations that prevent unfair competition from products that do not respect EU rules. An immediate ban is needed on the EU's exports of hazardous pesticides banned in the EU that endanger people and the environment in other parts of the world. Also the Strategic Dialogue report underlines that the EU should end the practice of unethical double standards, and that Member States should stop exports of within the EU banned hazardous pesticides to countries with less stringent regulations. Moreover, we want to highlight that the EU should ban the import of products containing residues of pesticides banned in Europe. This is essential to eliminate toxic residues in imported food and create fairer competitive conditions for EU farmers.

Ensuring better recognition of occupational diseases

Agricultural workers must be entitled to official documentation detailing the pesticide used during their work activity. This documentation would allow farm workers who fall sick from pesticide exposure to facilitate the proof that the disease is linked to their professional activity. Across the EU, occupational diseases caused by pesticide exposure should be recognised as such by the social security systems and be compensated appropriately.

Better protection of farm workers against pesticides

Experience from the ground shows that risk assessments at the workplaces are frequently not conducted, and workers are not adequately trained and informed about hazards associated with pesticide handling and exposure. Inspections rarely take place, and inspectors do not possess the expertise to recognise the workers' problems sufficiently and implement the necessary remedies. Protective equipment is often not provided. Moreover, experts underline that protective equipment fails to effectively and adequately reduce the impact of pesticides²⁹. 40% of the workforce in the agricultural sector are migrant and mobile workers. They are unaware of their rights and have poor command of the official language of the country of work.

Farm workers need targeted measures to ensure better protection from pesticide exposure and handling. Those shall consider realities on the ground and ensure access to training, effective and adapted workers information, better enforcement of occupational health and safety measures, and promotion of prevention activities to raise awareness among workers.

Adopting a redistributive pesticide levy

Finally, one of the most urgent political steps is an EU-wide introduction of a tax on pesticide sales, depending on the risk. A pesticide levy is a good way to finally implement the polluter-pays principle and encourage more sustainable behaviour among producers, users, and consumers. The SUD also highlights that economic instruments can play a crucial role in achieving objectives relating to the sustainable use of pesticides³⁰.

The costs of pesticide impacts are a huge burden to society. They should no longer be borne by people, water companies, beekeepers and farmers using no or minimal amounts of pesticides. A pesticide levy is a first step to internalising the actual cost of the use of pesticides. It can contribute to funding for the environmental costs of pesticide use, indemnifying those who suffer health consequences from the use of pesticides and supporting farmers in the transition to sustainable practices³¹. This levy could be linked to the pesticide hazard, reducing the levy for those pesticides that are low-impact pesticides.

Implementing a pesticide tax at the national level is an option, but a harmonised system across the EU would ensure a level playing field and have a more significant impact. The European Commission has the authority to require taxation. It can establish the specific details, as seen in existing directives such as the Energy Taxation Directive and the Tobacco Taxation Directive.

²⁹ <u>Negative effect of pesticide exposure for farmers and farm workers</u>

³⁰ Directive 2009/128/EC

³¹ Möckel, Stefan, et al. (2021). <u>Pesticide tax in the EU: Various levy concepts and their impact</u> on pesticide reduction"

Conclusion

Given the withdrawal of the SUR despite the urgent need and broad calls for pesticide reduction, including through two European Citizens' Initiatives, it is of the utmost importance for the EU to increase its efforts to effectively implement existing legislation and take ambitious steps towards pesticide reduction, ensuring that pesticides are used only as a very last resort. Aligning with the Farm to Fork objectives and the post-2020 Global Biodiversity targets must remain a priority of this new EU mandate.

The time for delay is over - the EU must act with urgency and ambition to protect the health and well-being of citizens, farmers and farmworkers, the health of our biodiversity and ecosystems, and lead the way towards more sustainable food systems without harmful pesticides.

Signatories:

PAN Europe Friends of the Earth Europe EFFAT BeeLife European Beekeeping Coordination Velt vzw Pesticide Action Network Netherlands Milieudefensie Générations Futures West-Vlaamse Milieufederatie vzw Climaxi Natuurpunt Vogelbescherming Vlaanderen **Quercus ANCN** Health and Environment Alliance (HEAL) **IFOAM Organics Europe** Fair Trade Advocacy Office ISDE, International Society of Doctors for Environment Journalists for Human Rights Wen (Women's Environmental Network) Swedish Society for Nature Conservation (SSNC) Eco Hvar **Ecobaby Foundation** Compassion in World Farming EU Lipu BirdLife Italia Natuur.koepel vzw Hogar sin Tóxicos Health and Environment Justice Support (HEJSupport) Natuurpunt Brugs Ommeland **VIA PONTICA FOUNDATION**

Natuurpunt De Bron vzw Natuurpunt Westland Groen leper Jesuit European Social Centre Broederlijk Delen Pestizid Aktions-Netzwerk e.V. (PAN Germany) Vogelbescherming Nederland / BirdLife The Netherlands Landschapsvrijwilligers leper SAFE – Safe Food Advocacy Europe Umweltdachverband **CEEweb** for Biodiversity ACU - ASSOCIAZIONE CONSUMATORI UTENTI (Consumers Users Association) Deutsche Umwelthilfe (Environmental Action Germany) Mouvement Écologique Hnutí DUHA - Friends of the Earth Czech Republic Slow Food Natagora Corporate Europe Observatory Veblen Institute for economic reforms Bond Beter Leefmilieu foodwatch International **Community Hygiene Concern** Bulgarian Society for the Protection of Birds PAN Italia Ecologostas en Acción ISDE Medici per l'Ambiente Italy Care-act-terre Estonian Green Movement Cellule Environnement de la Société Scientifique de Médecine Générale Bündnis für eine enkeltaugliche Landwirtschaft e.V. (BEL) BirdLife Europe and Central Asia **Dutch Butterfly Conservation** stichting Yourcenar **EIS Kenniscentrum Insecten** Child Rights International Network (CRIN) Friends of the Earth Malta Soortennl Nature & Progrès Friends of the Irish Environment Earth Trek (Zemljane staze) ECOCITY GLOBAL 2000 - Friends of the Earth Austria **BIOM Association** Natuurmonumenten Natuur & Milieu Agroecology Europe

ARCHE NOAH Natuur en Milieufederatie Zuid-Holland The Polish Society for the Protection of Birds (OTOP, BirdLife Poland)) natur&ëmwelt a.s.b.l. Association Hyla Mutualités Libres - Onafhankelijke Ziekenfondsen BirdLife Austria Feedback EU Natuurpunt Langemark Federazione Nazionale Pro Natura Campagne Ouni Pestiziden NOAH (FoE Denmark) Voedsel Anders Vlaanderen