

POLLINIS

A NONPROFIT AND INDEPENDENT ORGANIZATION THAT CAMPAIGNS FOR SUSTAINABLE FARMING IN EUROPE. POLLINIS FIGHTS AGAINST THE SYSTEMATIC USE OF PESTICIDES, FOR THE PROTECTION OF POLLINATORS AND PROMOTES ALTERNATIVE AGRICULTURAL PRACTICES. WE ARE SUPPORTED EXCLUSIVELY BY DONATIONS FROM PRIVATE INDIVIDUALS.

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FARM TO FORK STRATEGY - POLLINIS' FEEDBACK

Europe faces a massive decline of pollinators. This dramatic decline will have serious consequences on food security, biodiversity and the overall ecosystem. As demonstrated by a growing scientific consensus, urgent measures have to be adopted to hamper this decline, by intervening on its main drivers: loss of habitat and exposure to pollutants, linked to intensive, industrial-scale farming practices (genetically-uniform monocultures, wholesale use of synthetic pesticides and fertilizers, land-use change and landscape fragmentation, elimination of hedgerows and trees). As stated by the authors of a recent meta-analysis on insect decline (encompassing 73 studies published in the last 13 years)¹, « unless we change our ways of producing food, insects as a whole will go down the path of extinction in a few decades ».

Hence, the Farm to Fork Strategy represents one of the last opportunities for Europe to halt the extinction of pollinators and its consequences. The European Court of Auditors stated that the CAP reform, as presented by the European Commission, is not sufficient to respond to the environmental emergencies we are facing. In this context, POLLINIS appeals to the European Commission to guarantee that the Farm to Fork Strategy can live up to the European Green Deal's objectives, by playing a pivotal role in the transition to diversified agroecological systems and the phasing out of the use of synthetic pesticides and fertilizers. Such an objective needs a **cross-sectoral and holistic approach**. A proper coordination and harmonization of all EU legislations, including legislations on pesticides, the Green Deal, the Farm to Fork Strategy, the CAP reform, is the *conditio sine qua non* for a successful transition towards a sustainable, pollinator-friendly food production system.

In particular, POLLINIS underlines four key points of this cross-sectoral approach: 1) the phasing out of the use of synthetic pesticides and fertilizers and the improvement of risk assessment; 2) the CAP reform; 3) a moratorium on new genomic techniques; 4) the transparency issue.

1. Phasing out of the use of synthetic pesticides and fertilizers and improving risk assessment

POLLINIS is calling on the European Commission to :

- **Set binding reduction targets for the use of synthetic pesticides of 50% by 2025, 80% by 2030, to reach a full phase-out by 2035; as asked in the ECI « Save Bees and Farmers ».**

¹ Sñchez-Bayo, F., & Wyckhuys, K. A. G. (2019). Worldwide decline of the entomofauna: A review of its drivers. *Biological Conservation* 232, 8-27.

This should go hand in hand with an obligation for Member States to report on the progress achieved to fulfill these mandatory targets and the establishment of penalties in case of non- respect.

- **Amend European pesticides legislations accordingly and compel Member States to fully implement:** Regulation No 1107/2009/EC concerning the placing of plant protection products (PPP) on the market, Regulation No 1185/2009 concerning statistics on pesticides, and Directive No 128/2009/EC establishing a framework for community action to achieve the sustainable use of pesticides. In particular, article 4 on national action plans adopted by Member States and article 15 on harmonised risk indicators of this Directive should be modified.
- **Comply**, along with Member States and the relevant European Agencies, **with the legal framework on pesticides risk assessment** established by Regulations No 1107/2009 (in particular article 4 and point No 3.7.2.3. of the annex 2), No 283/2013, and No 284/2013. This involves taking into account all relevant data including chronic toxicity to bees, the effects on honeybee development and other honeybee life stages, pollen and bee products, dust drift, and water. To this end, the European Commission must urgently adopt the 2013 EFSA Bee Guidance Document. The ongoing revision of this guidance document should guarantee a proper evaluation of PPP on different pollinators as well as the highest possible level of protection from harmful substances.
- **Fully apply the precautionary principle regarding pesticide risk assessment.**
- **Compel Member States to respect their obligation to deliver the comparative assessment of PPP containing candidates for substitution** as stated under article 50 of Regulation No 1107/2009, and take measures accordingly.

2. The Common Agricultural Policy (CAP) reform

POLLINIS highlights the necessity to preserve biodiversity in agrosystems as a crucial issue to be addressed, considering its key role for sustainable primary production. The next CAP, as an essential tool to support the F2F strategy, must not promote practices harmful to biodiversity, in order to protect European food production and guarantee healthy and resilient agroecosystems. To face food security, climate change and biodiversity loss challenges, the next CAP must enable the EU agroecological transition, by supporting farmers and facilitating a rapid adoption of sustainable farming practices.

Negative impacts of intensive agriculture must be better addressed and public investment should be restructured in order to improve, not deteriorate, environmental conditions. Measures which target ecological systems are too rare, not sufficiently endowed and not easily accessible to all farmers, although they represent an efficient lever for agroecological transition. The financial means involved are insufficient compared to other subsidies.

Consequently, an important proportion of the next CAP should be devoted to environmental and climate challenges, including agri-environment measures (AEM), payments for environment services and support to organic farming. Harmful subsidies and incentives in the CAP should be replaced with incentives for practices benefitting pollinators and, more broadly, biodiversity, making organisms strong allies for agriculture. The effectiveness of these measures should be measurable.

CAP payments must not be allocated to pesticide use

Due to too limited mandatory instruments within the CAP, subsidies are too largely employed by farmers for synthetic inputs (pesticides, fertilizers). Measures included in the CAP are not sufficiently strong to efficiently implement Integrated Pest Management (IPM) or promote organic farming. IPM should be linked to payments under the new PAC.

Transforming the Directive on Sustainable Use of Pesticides (2009/128/EC) into a regulation, together with fully integrating IPM principles into the CAP through Statutory Mandatory Requirements (SMRs) would favour the prioritization of non-chemical alternatives to pesticide use by farmers. The effectiveness of IPM can be guaranteed with binding legal requirements; reliable indicators must be developed to measure compliance. Harmonized Risk Indicators (HRI) as mentioned in art. 15.4 of the Directive EC 128/2009, should be updated to provide information not only on risks and impacts, but also on the evolution of farmers' dependency on synthetic inputs. Direct economic incentives must be allocated to farmers adopting alternative and ecological farming, with particularly urgent actions needed to drastically reduce pesticide use.

Enhanced conditionality constitutes the baseline for a more sustainable and ambitious agriculture and new obligations must be added in order to encourage farmers to engage in holistic changes strengthening biodiversity and more generally, to target high level and ambitious environmental criteria.

The monitoring of EU pesticide uses (regulation EC No 1185/2009) is fundamental and needs to be improved and harmonized, as recently declared by the EU Court of Auditors (Special Report 05/2020). A reliable database on PPP uses, which should include indicators relevant for national volumes according to crop-specific criteria and based on statistical data directly submitted by farmers, constitutes a key element to reflect the overall effectiveness of measures aiming at replacing synthetic inputs by sustainable alternatives.

CAP must set milestones of an effective European agroecological transition to preserve sustainable food production systems

Ecological farming reattributes autonomy to small farms (which are disappearing at an appalling rate from the EU rural landscape); enhances a food production which respects natural cycles, biodiversity, farmers and consumers; gradually restores the ecosystem complexity and its resilience capacities. Incentives should drive agro-ecological approaches in order to diversify agricultural land use and encourage the multiplicity of small-scale farms. Specific tools under both first and second pillars of the next CAP (eco-scheme, GAECs, agri-environmental measures, natural handicap compensatory allowances...) have to be articulated in a coherent way and employed to strongly support organic farming, land use diversification as well as a large number of already well-identified beneficial practices. This could be achievable by reallocating direct subsidies toward labour force payments rather than area payments (as suggested by e.g. France Strategy or Plateforme pour une autre PAC). This will allow to support both a wide adoption of respectful farming practices (e.g. crop rotation, polyculture, permanent soil cover) and agricultural employment, considering these practices often require more work.

Facilitating the multiplication and maintenance of non-productive areas and semi-natural environments (e.g. hedges, trees, grasslands, buffer strips, field margins, fallow lands) would provide more habitats for biodiversity, especially for pollinators and soil organisms which are essentials to ensure sustainable food production systems.

Eco-schemes, as new measures of the CAP within pillar I, present unique opportunities to promote

effective and good practices developed by farmers, and to support crop and landscape diversification at national levels. Transition measures should be completed with measures such as Payments for Environmental Services (PES), which support ecological farming systems that have already operated their transition and non-market services provided by agriculture, rather than offsetting shortfalls.

3. New genomic techniques

Gene drive organisms are a new invasive technology that allows the genetic modification of entire populations of sexually reproducing organisms: insects, birds, mammals and other animal populations and potentially even plants. The consequences of these discoveries question our very relationship to all living beings and will impact many aspects of our lives, from our health to the environment in the way we produce our food.

Considering that these techniques go far beyond the scope of existing risk assessment methods, POLLINIS is calling the European Commission to support a moratorium on the

a. Release of gene drive organisms; and b. Experimental release of transgenic organisms testing the effects of gene drive on human and animal health; and the environment. This moratorium should not exclude further research.

4. Transparency issues

Transparency represents a key principle of the EU and a prerequisite of its democratic character. Thus, it is essential to reinforce transparency measures for both the fulfillment of the above-mentioned objectives and the trust European citizens put in this whole strategy.

This is the reason why POLLINIS is calling on the European Commission to :

- **Reinforce legislative measures adopted to ensure an independent and transparent scientific risk assessment scheme for plant protection products.** On the one hand, the European Commission must strengthen the existing legal framework aiming at avoiding conflicts of interests in relation to plant protection product risk assessment. On the other hand, regarding the recently adopted Regulation No 1381/2019, the European Commission, along with Member States and the relevant European agencies, must, while implementing it, ensure the effectiveness of public access to information.
- **Strengthen transparency in the elaboration and implementation of the CAP strategic plans and involve a greater number of actors, including civil society representatives,** while preparing those plans. As consumers and financial contributors of the CAP, European citizens should be given the opportunity to make their voices heard.
- **Ensure transparency in the granting of economic incentives to farmers and the respect of allocation criteria linked to sustainable farming practices defined in the CAP.**
