

## JOINT STATEMENT

### Urgent need for precise public data on the use of pesticides across Europe

*Statement of 76 organisations on the state of play of the negotiations on the revision of EU rules on pesticides statistics*

The undersigned organisations express their deep concerns about the direction the negotiations within trilogues are taking on the reform of the agriculture statistics regulation (SAIO).<sup>1</sup> We call upon the Member States to support the European Parliament's proposals ensuring precise data on the use of pesticides are collected and published **without further delay**.

To ensure that European agriculture shifts away from pesticide intensive practices, we need **precise public data on what pesticides are used where, when, on which crops and in what quantities**. Such data would indeed:

- Allow to **measure meaningfully the progress** and identify which sectors or crops and in which regions are facing difficulties to transition to sustainable agriculture practices;
- Enable the **work of independent scientists and the medical community** to connect the dots between exposure to specific pesticides or a cocktail thereof and harm to the environment and/or people;
- Enable the work of the public authorities to check whether the data submitted for pesticides authorisations actually matches **the reality of their use**;
- Enable public authorities to **list more efficiently which pesticides end up in water** and must therefore be monitored, so that they can take appropriate measures to protect, for example, residents of rural areas, and biodiversity;
- **Rebuild trust of EU citizens** in national governments, the EU institutions, and their willingness to protect public health and the environment despite the weight of private interests such as the agrochemical lobbies.

This trust of EU citizens is currently broken because it is obvious today that pesticide use and their risks for human health and the environment are **out of control**. Our legal system was meant to only allow pesticides that have i) no immediate or delayed harmful effect on human health ii) no unacceptable effects on plants and iii) no unacceptable effects on the environment.<sup>2</sup> Unfortunately, the way this authorisation system has been applied in practice raises very serious doubts as to the safety of the pesticides products on the EU market.<sup>3</sup> The evidence of unacceptable harm to biodiversity,<sup>4</sup> and to frontline workers - agriculture workers - is piling up.<sup>5</sup> This system does not even benefit economically the farmers themselves,<sup>6</sup> and alternatives to pesticide intensive agriculture exist and are feasible.<sup>7</sup>

In light of the proven impact of pesticides on public health and the environment, and the need to switch to alternative models of agriculture, the scarce amount of data on pesticide use collected and published is incomprehensible.<sup>8</sup> California has put in place a comprehensive and public database on this matter already **in the 90s**.<sup>9</sup> What is even more surprising is that **the data exist but are left unexploited by public authorities**. Indeed, farmers, and all other professional users of pesticides, are obliged - and have been obliged for more than 10 years - to keep at the disposal of public authorities records of the pesticides they use.<sup>10</sup> And yet, these records are not systematically collected. To access these records, the public – e.g. doctors, scientists, a union

<sup>1</sup> Proposal for a Regulation related to statistics on agriculture input and output (SAIO):

[https://oeil.secure.europarl.europa.eu/oeil/popups/ficheprocedure.do?reference=2021/0020\(COD\)&l=en](https://oeil.secure.europarl.europa.eu/oeil/popups/ficheprocedure.do?reference=2021/0020(COD)&l=en)

<sup>2</sup> See Article 4 of Regulation (EC) No 1107/2009

<sup>3</sup> European Journal of Risk Regulation , Volume 11 , Issue 3 , September 2020 , pp. 450 – 480 DOI: <https://doi.org/10.1017/err.2020.18>; [Impacts des produits phytopharmaceutiques sur la biodiversité et les services écosystémiques : résultats de l'expertise scientifique collective INRAE-Iframer | INRAE INSTIT](#)

<sup>4</sup> Goulson, D. Pesticides linked to bird declines. *Nature* **511**, 295–296 (2014). <https://doi.org/10.1038/nature13642>

<sup>5</sup> LeMonde, "Agriculteurs intoxiqués": dans toute l'Europe, les maladies des pesticides abandonnés à leur sort, S. Horel, 17 February 2022 |

<sup>6</sup> [Pesticides: a model that's costing us dearly – Le Basic](#)

<sup>7</sup> Poux and Aubert (2018) An agroecological Europe in 2050: multifunctional agriculture for healthy eating, IDDRI:

[https://www.researchgate.net/publication/335054821\\_An\\_agroecological\\_Europe\\_in\\_2050\\_multifunctional\\_agriculture\\_for\\_healthy\\_eating\\_Findings\\_from\\_the\\_Ten\\_Years\\_For\\_Agroecology\\_TYFA\\_modelling\\_exercise](https://www.researchgate.net/publication/335054821_An_agroecological_Europe_in_2050_multifunctional_agriculture_for_healthy_eating_Findings_from_the_Ten_Years_For_Agroecology_TYFA_modelling_exercise)

<sup>8</sup> Only very vague data are collected and published – see : [https://ec.europa.eu/eurostat/web/products-datasets/-/aei\\_pestuse](https://ec.europa.eu/eurostat/web/products-datasets/-/aei_pestuse)

<sup>9</sup> Wilhoit, History of Pesticide Use Reporting in California, Chapter 1pp 3-14, ACS Symposium Series Vol. 1283 - see [ACS Symposium Series \(ACS Publications\)](#)

<sup>10</sup> Article 67 of Regulation (EC) No 1107/2009

of agriculture workers or a water supply company, have no choice but to follow a lengthy and heavy procedure, which often requires going to court.

In light of the latest public information,<sup>11</sup> the negotiations seem to be progressing in a more positive direction. However, **many key aspects are still extremely concerning and unclear**. More specifically:

- While we welcome the recognition by the French Presidency of the need to have yearly data on pesticide use as well as an electronic collection of the farmers' records, we are deeply concerned by the compromise text proposed as it does not guarantee that the farmers' records will be collected soon enough. Indeed, the first year this data would be collected would be **2028, i.e. in 6 years**. Meanwhile, irreversible damages to people's health and biodiversity are bound to occur due to out of control pesticide exposure.
- There is also even a high risk that these records will actually never be collected, since this will depend on the harmonisation of a digital format to be decided in a separate procedure (implementing act under Regulation (EC) No 1107/2009) without any time constraints or possibility for the European Parliament to have a say.
- While waiting for 2028, the compromise proposed suggests having only one survey (in 2026). This is insufficient to provide a clear picture of progress towards the reduction targets set for 2030 in the Farm to Fork Strategy. In addition, such a survey is only going to cover a selection of common crops between Member States and will only be defined later (via implementing acts) in a procedure in which the European Parliament will have no say.
- Finally, while we welcome the recognition that the rules on access to documents and on access to environmental information remain fully applicable, the legal text proposed regarding the dissemination of the data leaves too much room for interpretation. It does not offer the necessary legal certainty that the data on all pesticide use and sales will actually be published per active substance in full compliance with the rules on access to environmental information.

**In short, if the compromise text on these aspects became law, the data collected on pesticide use will be too little, too late, with a concerning uncertainty as to what will actually be published.**

We, therefore, call on the negotiators, and in particular the Council, to take into account these concerns, and specifically to:

1. **Shorten the transition period** for the first digital collection of **all** farmers' records for **all** crops - to **2025**. Speed is a matter of commitment and investment of national governments. This investment is long overdue: the need for pesticide use data was already acknowledged in 1993<sup>12</sup>;
2. Make the **annual** collection of the farmers' records **mandatory** in the SAIO text. This collection shall be done by the national authorities in charge of the implementation of the pesticides regulation;
3. Create an obligation for the Commission to adopt - by delegated act under SAIO - before 1<sup>st</sup> January 2023, the **harmonised electronic format** of the farmers' records; At the very least, if this electronic format is to be defined under an implementing act under Regulation (EC) No 1107/2009, this act shall then be adopted **before July 2022**;
4. Adopt a provision on the **dissemination of the data** on pesticide use and sales similar to what the Parliament proposed stating explicitly and upfront what level of details will be published. It is essential that the data be published per active substance, area treated (ha) and per crop.

We also reiterate our concerns in relation to points that, to our knowledge, have not been discussed yet in the trilogues:

- Data on pesticide use at least at the **regional level** (NUTS3) are key for the data to be useful. The data also needs to be sorted between pesticides used in **organic** farming and those used in conventional farming;
- There are **too many potential derogations** in the Commission Proposal which could limit unduly the information transmitted to Eurostat regarding pesticides. These derogations or exemptions shall not apply to pesticide data since the data has been available for 10 years and their collection is long overdue.

<sup>11</sup> The latest 4 column document published in the Council register on 23 May 2022 : [pdf \(europa.eu\)](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52022PC0100&from=doctrines)

<sup>12</sup> See 5th Environment Action Programme that already defined as target "reduction of chemical inputs"; it also specifically set as an objective "the significant reduction in pesticides use per unit of land under production [...] » by 2000 and **foresaw as an actions: "registration of sales and use of pesticides"**: <https://ec.europa.eu/environment/archives/action-programme/env-act5/pdf/5eap.pdf>

For a truly modern and sustainable agriculture, governments must invest in the relevant data systems and put these data in the public domain where they belong. This cannot wait until 2028.

### List of signatories:

	ORGANISATION	STATE	SIGNATORY
1	ADENY	FR	Sylvie Beltrami
2	Agroecology Europe	EU	Lili Balogh
3	Alliance for Cancer Prevention	UK	Helen Lynn
4	Apicultural Research Educational Center	GR	Fani Hatjina
5	Apimondia	GR	Jeff Pettis
6	ÄrztInnen für eine gesunde Umwelt	AT	Hanns Moshhammer
7	Asociación Vida Sana	ES	Ángeles Parra
8	Association Organic Gardens for Education	SI	Anamarija Slabe
9	Aurelia Stiftung	DE	Thomas Radetzki
10	Beelife	EU	Noa Simon
11	Biom Association	HR	Željka Rajković
12	BirdLife Europe and Central Asia	EU	Ariel Brunner
13	BirdLife The Netherlands	NL	Cees Witkamp
14	Buglife	UK	Matt Shardlow
15	Center for International Environmental Law (CIEL)	CH	David Azoulay
16	ClientEarth	EU	Anaïs Berthier
17	Compassion in World Farming	EU	Olga Kikou
18	Coordination gegen BAYER-Gefahren	DE	Jan Pehrke
19	Corporate Europe Observatory (CEO)	EU	Nina Holland
20	Deutsche Umwelthilfe e.V.	DE	Sascha Müller-Kraenner
21	Dutch Bee Conservation	NL	Maaïke Molenaar
22	Earth Thrive	UK/Serbia	Zoe Lujic
23	Earth Trek	HR	Damir Grgić
24	Eco-Hvar	HR	Vivan Grisogono
25	ECOCITY	GR	Eri Bizani
26	Ecodesign competence centre	LV	Jana Simanovska
27	Ecologistas en Acción	ES	Koldo Hernandez
28	EEB	EU	Jeremy Wates
29	EFFAT	EU	Kristijan Bragason
30	Égalité	IT	Dario Dongo
31	EPBA	FR	Cindy Adolphe
32	EURAF	EU	Gerry Lawson
33	Eureau	EU	Oliver Loebel
34	FODESAM	ES	Carlos de Prada
35	Friends of the Earth Malta	MT	Martin Galea De Giovanni
36	Fundación Global Nature	ES	Eduardo de Miguel
37	Generations Futures	FR	Nadine Lauerjat
38	Global 2000	AT	Helmut Burtscher-Schaden
39	Green Federation "GAIA"	PL	Jakub Skorupski
40	Health and Environment Alliance	EU	Angeliki Lysimachou
41	Hnutí DUHA (Friends of the Earth Czech Republic)	CZ	Anna Kárníková
42	Hogar sin Toxicos	ES	Carlos de Prada
43	Hungarian Agroecology Network Association	HU	Lili Balogh
44	IAWR	DE	Wolfgang Deinlein
45	IFOAM Organics Europe	EU	Eric Gall
46	Institute Marquès	ES	Mireia Folguera
47	Integrated Resources Management Co Ltd, (IRMCo)	MT	Anna Spiteri
48	Justice Pesticides	FR	Arnaud Apoteker

	ORGANISATION	STATE	SIGNATORY
49	Kecskeméti Szatyor Közösség Egyesület	HU	László Szigeti
50	Latvian Fund for Nature	LV	Baiba Vitajevska-Baltvilka
51	Lipu - BirdLife Italia	IT	Federica Luoni
52	LPN	PT	Inês Machado
53	Mouvement Ecologique Luxembourg	LU	Roger Dammé
54	Nature & Progrès Belgique	BE	Marc Fichers
55	Navdanya International	International	Elisa Catalini
56	Neo-Agri	FR and ES	Sidney Flament-Ortun
57	NOAH - Friends of the Earth Denmark	DK	June Rebekka Bresson
58	Pesticide Action Network (PAN) Europe	EU	Martin Dermine
59	Pestizid Aktions-Netzwerk e.V. (PAN Germany)	DE	Susanne Smolka
60	PAN Italia	IT	Fabio Taffetani
61	Pesticide Action Network Netherlands	NL	Margriet Mantingh
62	Plataforma Transgenicos Fora	PT	Lanka Horstink
63	Polish Ecological Club	PL	Maria Staniszevska
64	Pollinis	FR	Barbara Berardi Tadié
65	ROMAPIS	RO	Constantin Dobrescu
66	SEO/BirdLife	ES	Tamara Rodríguez Ortega
67	Sociedad Española de Agricultura Ecológica	ES	Concha Fabeiro
68	SNA	FR	Frank Alétru
69	SOS Faim Belgium	BE	Jonas Jaccard
70	Stadtbiene e.V.	DE	Johannes Weber
71	SumOfUs	International	Eoin Dubsky
72	Umweltinstitut München e.V.	DE	Vera Baumert
73	Union Nationale de l'Apiculture Française	FR	Clémence Rémy
74	Via Pontica Foundation	BG	Ina Agafonova
75	WECF International	NL	Sascha Gabizon
76	ZERO - Associação Sistema Terrestre Sustentável	PT	Pedro Horta