Brussels, 21 February 2022



Dear Vice-President Timmermans,

Dear Commissioner Kyriakides,

Dear Commissioner Wojciechowski,

Dear Commissioner Sinkevičius,

You are preparing a proposal for a new pesticide reduction regulation, to be published on March 23rd. The *Save Bees and Farmers* European Citizens Initiative will soon be validated. So, we ask you to take into account the ECI demands now.

1.2 million Europeans and 250 organisations demand and expect:

1. A reduction of 80% in use of synthetic pesticides in the EU by 2030 and 100% by 2035

- 2. Measures to restore biodiversity on agricultural land
- 3. Massive support to farmers to transition towards agroecology

The draft EC proposal for the Pesticide Regulation is in our view too weak to address the urgent health and biodiversity crises. We need more ambitious steps.

In 2009 the Sustainable Use of Pesticides Directive was introduced. The aim was to:

- Use synthetic chemical pesticides only as a last resort, giving preference to nonchemical alternatives or to pesticides of low risk
- Implement strict mitigation measures (including buffer zones)
- Reduce volumes of pesticide use
- Substitute less safe compounds with safer ones
- Protect vulnerable groups

EU countries have failed to respect this directive. Therefore, it had a limited impact:

- The total use of pesticides has not significantly decreased since the introduction of the directive.
- 55 of the most toxic pesticides that were to be phased out long ago are all still there
- Pesticides remain the preferred approach to pest management in agriculture, with use of seed coatings and multiple spraying all year round
- The idea was to use integrated pest management with practices like crop rotation, cover crops, use of buffer zones to stimulate natural pest control, mechanical weeding and all other available agronomic practices, with the use of pesticides only as a last resort. However, this is only applied on a small scale, in particular in organic farming.
- EU farmers' knowledge on non-chemical alternatives and preventative methods of pest control has not significantly increased

So we have lost 13 years since the introduction of the SUD directive. Swift action is now extremely urgent because:

- Biodiversity is on the brink of collapse (IPBES 2019), putting the future of our food, livelihoods, health and environment under severe threat (FAO 2019)
- We have lost up to 75% of the insect population over the last 30 years, aquatic life is suffering and many birds have disappeared. Soil life, the basis of soil fertility has been seriously harmed by the numerous pesticides residues it is exposed to.

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- Pesticides are omnipresent, even in areas where they are not applied. They build up in the soil, they pollute and spread through water and air. The quality of our air and surface water is far below the required levels in many parts of Europe.
- More and more scientific research concludes that there is a strong link between pesticides and cancer, as well as damage to our brains leading to diseases like Parkinson's.

We urgently need far more ambitious EU actions to reduce the use (and risk) of synthetic pesticides to combat the biodiversity and health crisis. Pesticides should be treated as harmful substances and regulations should be improved.

Therefore, we ask you to take the following actions:

- Create binding targets for all EU countries towards a full phase out as demanded by 1,2 Million EU citizens in the Save Bees and Farmers ECI. We need an 80% reduction by 2030 and a full phase out of synthetic pesticides by 2035 to address biodiversity and health crises.
- Mobilise additional financial resources to support farmers in making the necessary transition towards a toxic-free agriculture. CAP funding should be linked to pesticide reduction objectives.
- Take all 55 Highly Hazardous Pesticides (HHPs) off the market immediately.
- Stop allowing EU countries to grant derogations to continue using banned pesticides.
- Ban imported products contaminated with non-approved pesticides, or that contain residues of any pesticide exceeding the EU's permitted maximum residue levels, with no exceptions. This will create a level playing field for European farmers.
- Biodiversity crisis is a global problem. Stop the export of banned pesticides from the EU.
- Make pesticide application frequency the main indicator to monitor the pesticide reduction target rather than pesticide sales statistics. The Harmonised Risk Indicator 1 (HR1) is unsuitable for monitoring the reduction of the use and risk of pesticides.
- Use proper statistics on pesticide use in the statistics on agricultural input and output (see this publication on the SAIO proposal).

We expect the EU commission to include an 80% reduction of pesticides for 2030 and not the 50% that is proposed now. This is even more important because the final proposal - expected on March 23rd - is the start of the next steps. Once launched, a discussion will follow in the EU Parliament and between EU member states. Many Member States will try to water down the Commission targets.

Every country will have to decide on its position and react to the proposal. The citizens that signed the Save Bees and Farmers initiative will be very interested to see what is happening with their demands, both at the national and at the EU level. Many will surely raise their voices again to support a strong Commission proposal. Together we will make sure that the use of pesticides becomes an exception rather than the norm.

Respectfully yours,

Martin Dermine, representative of the Save Bees and Farmers Citizens Committee

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