



18/05/2022

To: Ministers for Agriculture, Climate, Environment, Health
Cc: Members of EU Parliament, EU Commission

Re: The European Pesticide Reduction Regulation

Dear Ministers, Dear members of the European Parliament,

The Russian invasion of Ukraine has exposed the overdependence of industrial farming in Europe on fossil fuel and inputs such as feed, fertilisers, and pesticides. These products contribute to the destruction of biodiversity and climate change. Now is the time to accelerate the transition towards sustainable farming and food security, based on healthy soils, clean water and biodiverse landscapes. This necessitates a drastic reduction in pesticides as soon as possible. The European Commission has postponed the proposals for a [European Pesticide Reduction Regulation](#) that should have been presented on March 23rd, together with binding [Nature Restoration targets](#). We ask you to use your influence in Europe to speed up this process and to support ambitious proposals.

We have seen leaked draft versions of the pesticide reduction proposals, and believe that they are too weak to address the urgent health and biodiversity crises we are in. We need a better and more ambitious regulation to ensure healthy food in the long term.

The regulation will replace the 2009 Sustainable Use of Pesticides Directive, which aimed to:

- Use synthetic chemical pesticides only as a last resort, starting with good agronomic practices and Integrated Pest Management, giving preference to non-chemical alternatives if necessary 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

Most EU countries did not implement the directive. Therefore, it had a limited impact:

- Pesticides remain the preferred approach to pest management in agriculture, with use of seed coatings and multiple spraying all year round.
- Total pesticide use has not significantly decreased.

- The 55 most toxic pesticides that should have been phased out long ago are still in use.
- 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, particularly in organic farming.
- EU farmers' knowledge on non-chemical alternatives and preventative methods of pest control has not significantly increased.

As a result, we have lost 13 years since the introduction of the SUD directive. Swift action is now urgently needed 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, with significant knock-on impacts on the functioning of food webs and essential ecosystem services.
- Aquatic life is suffering and our soils, the basis of soil fertility, have been seriously harmed by the numerous pesticides residues it is exposed to.
- 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 legally 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 actions to reduce the use (and risk) of synthetic pesticides to combat the biodiversity and health crisis and ensure sustainable production of healthy food. Pesticides are harmful substances and should be regulated as such.

Therefore, we ask you to take the following actions:

1. Help to improve the proposed legislation on pesticide reduction.
2. Support binding targets towards a full phase out as demanded by 1.2 Million EU citizens in the Save Bees and Farmers ECI, who asked for an 80% reduction by 2030 and a full phase out of synthetic pesticides by 2035 to address biodiversity and health crises.
3. Use CAP subsidies and mobilise additional financial resources to support farmers in making the necessary transition towards toxic-free farming. Link CAP funding to pesticide reduction objectives.
4. Take all Highly Hazardous Pesticides (HHPs) off the market immediately.
5. Stop derogations that facilitate the use of banned pesticides.
6. 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 farmers.
7. The biodiversity crisis is a global problem. Stop the export of banned pesticides.
8. 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 in the use and risk of pesticides.
9. Use proper statistics on pesticide use in the statistics on agricultural input and output (see this publication on [the SAIO proposal](#)).

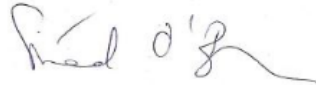
Every country will decide on its own position in response to the proposal. We ask you to ensure that Ireland takes every step necessary to restore biodiversity and prevent damage to health, water and environment, reward farmers for working with nature and ensure fair prices for healthy food.

Please listen to our members and supporters and the 1.2 million EU citizens that signed the Save Bees and Farmers campaign. Together let's build a future where the use of pesticides becomes an exception rather than the norm.

Respectfully yours,



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