### **OPEN LETTER**

#### To:

The Members of Standing Committee on Plants, Animals, Food and Feed (PAFF Committee)

The Chair of the PAFF Committee, Head of Unit Pesticides and Biocides, in Directorate-General for Health and Food Safety at the European Commission

Via e-mail

11 July 2022

## Subject: Call to adopt without delay the Implementing Regulation harmonising the content and format of the pesticide use records

Dear representatives of national governments, members of the PAFF Committee.

Dear Chair of the PAFF Committee,

We are writing on behalf of 58 organisations across Europe in view of the next PAFF Committee meeting on 14-15 July when you will discuss the draft Commission Implementing Regulation under Regulation (EC) No 1107/2009 on "the content and format of the records of the use of plant protection products to be kept by professional users in accordance with Article 67(1) of Regulation (EC) No 1107/2009" (see Agenda, item C.01).

First of all, we would like to state that we welcome the agreement reached on the new regulation on agricultural input and output statistics (SAIO), in particular the obligation to collect and publish data on the use of pesticides on an annual basis.

Evidence of unacceptable harm from extensive pesticide use, whether to biodiversity,<sup>1</sup> or to agricultural workers, is piling up.<sup>2</sup> Keeping track of what pesticides are used where when and how is therefore of utmost importance.









































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

<sup>2</sup> LeMonde, "Agriculteurs intoxiqués": dans toute l'Europe, les maladies des pesticides abandonnés à leur sort, S. Horel, 17 February 2022

Beyond the need to analyse trends in the use of pesticides, precise and public data on pesticides use are also indispensable to enabling more realistic analysis of the exposure of agriculture workers and residents in rural areas, as well as the exposure of wildlife and ecosystems. Such data are also key to monitoring water, notably for drinking water suppliers. They are crucial for many other necessary tasks that are in the public interest. It is, in addition, a topic of great importance to millions of EU citizens. The issue of pesticides was indeed the subject matter of the recent European Citizens' Initiative "Save Bees and Farmers" which gathered approximately 1.2 million signatures across Europe.

That is why, as trade unions, environmental, health and beekeeper organisations including the organisers of the <u>European Citizens</u> <u>Initiative Save Bees and Farmers</u>, as well as the European umbrella organisation for organic food and farming, we have been following closely the negotiations on the new regulation on the Statistics for Agriculture Input and Output (SAIO) with a particular focus on pesticide use data. As explained in multiple open letters and public statements,<sup>3</sup> it was already clear in 1993 that public authorities needed meaningful data on pesticide use to be able to protect people and the environment properly.<sup>4</sup>

On the basis of the outcome of the trilogue, we believe the new SAIO regulation has the potential to lead to much improved pesticide use data. However, according to the text agreed, the annual collection of pesticide use data will only start in 2028 and if an Implementing Regulation harmonising the content and format of the pesticide use records is adopted. This is a major factor of uncertainty of the SAIO reform that now has to be fixed in the context of the PAFF Committee.

The Commission has prepared an informal draft Implementing Regulation which will be presented on 13-14 July. Furthermore, the Commission has committed to follow a strict timeline. This timeline is laid out in the attached document we obtained following an access to

- E.g. February 2022, <u>79 organisations voice their concerns on the reform of pesticides statistics | ClientEarth</u>; May 2022 <u>Joint statement: Urgent need for precise public data on the use of pesticides across Europe | ClientEarth</u>
- 4 The Fifth Environmental Action Programme defined as a target the "reduction of chemical inputs" in agriculture, specifically setting as an objective "the significant reduction in pesticides use per unit of land under production" by 2000 and foreseeing the "registration of sales and use of pesticides"
- 5 Evaluation of the outcome of the trilogue held on 2 June on the reform of pesticides statistics | ClientEarth





































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document request to the Secretariat of the Council (see Annex).

The SAIO reform and its ability to finally deliver robust pesticide use data is now in the hands of the PAFF Committee. It is the moment for national governments to show to their citizens that they are serious about improving the quality and availability of pesticide use data and protecting the health of people and the environment against pesticides.

We therefore call on:

- 1. Each national government represented in the PAFF Committee to adhere to the Commission's timeline, i.e. cooperate in good faith to ensure that the draft Implementing Regulation is formally adopted by the end of 2022.
- 2. The European Commission to adhere to the timeline set out in the attached statement, as well as **publish without delay the latest version of the draft Implementing Regulation** in order to allow civil society to review this draft and participate in a constructive manner to this important decision making process.

Thank you for your consideration.

Yours sincerely,

Alice Bernard Senior Law and Policy Advisor,

Chemicals, ClientEarth

Natalija Svrtan Campaigner, PAN Europe

Helmut Burtscher-Schaden Campaigner, Friends of the Earth

Austria, GLOBAL 2000































Annexe: Document dated 3 June 2022 "Statement by the Commission on on-going work to ensure availability in electronic format of the records to be kept by professional users of plant protection products pursuant to Article 67(1) of Regulation (EC) No 1107/2009" (ref. 6728/22 add 2)







# List of signatories

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52	ROMAPIS	RO	Constantin Dobrescu
53	SumOfUs	International	Eoin Dubsky
54	Umweltinstitut München e.V.	DE	Vera Baumert
55	UNAF	FR	Clémence Rémy
56	WECF International	NL	Johanna Hausmann
57	WeMove Europe	EU	David Schwartz
58	ZERO - Associação Sistema Terrestre Sustentável	PT	Pedro Horta



Bruxelles, le 3 juin 2022 (OR. fr, en)

**Dossier interinstitutionnel:** 2021/0020(COD)

6728/22 ADD 2

**LIMITE** 

**AGRI 68 AGRIFIN 20 AGRIORG 21 AGRISTR 9** STATIS 10 **CODEC 223 PESTICIDE 6** 

### **DOCUMENT DE TRAVAIL**

Origine:	Secrétariat général du Conseil
Destinataire:	délégations
N° doc. Cion:	5865/21 + ADD1
Objet:	Proposition de RÈGLEMENT DU PARLEMENT EUROPÉEN ET DU CONSEIL relatif aux statistiques sur les intrants et les produits agricoles et abrogeant les règlements (CE) n° 1165/2008, (CE) n° 543/2009, (CE) n° 1185/2009 et la directive 96/16/CE du Conseil - Déclaration de la Commission

Les délégations trouveront en annexe une déclaration de la Commission relative à la proposition de règlement SAIO.

6728/22 ADD 2 HVW/amcr LIMITE FR/EN LIFE.1

"STATEMENT BY THE COMMISSION ON ON-GOING WORK TO ENSURE AVAILABILITY IN ELECTRONIC FORMAT OF THE RECORDS TO BE KEPT BY PROFESSIONAL USERS OF PLANT PROTECTION PRODUCTS PURSUANT TO ARTICLE 67(1) OF REGULATION (EC) NO 1107/2009

The European Green Deal and the Farm to Fork Strategy establish the reduction in the use and risk of chemical pesticides as a key objective for the Union. In order to guarantee effective and impactful policies, robust and comprehensive data on the use of pesticides at farm level is crucial. The on-going work to ensure the availability in electronic format of the records kept by professional users of plant protection products is an important enabling factor to implementing the reporting obligations on pesticides that are part of the proposal for a Regulation of the European Parliament and of the Council on statistics on agricultural input and output (SAIO).

Therefore, the Commission has prepared a draft Commission Implementing Regulation, on the basis of Article 67 (4) of Regulation (EC) No 1107/2009 of the European Parliament and of the Council, as regards the content and format of the records of the use of plant protection products to be kept by professional users in accordance with Article 67 (1) of Regulation (EC) No 1107/2009.

This Commission Implementing Regulation would, if adopted as currently foreseen, regulate the record-keeping required under Regulation (EC) No 1107/2009 in detail, including by identifying the elements to be recorded by the professional users, and by ensuring that these records will be available in electronic format from 1 January 2025 at the latest.

The draft Implementing Regulation is currently under discussion in the Standing Committee on Plants, Animals, Food and Feed, Section Phytopharmaceuticals - Legislation. The Commission intends to seek the opinion of the Committee pursuant to Article 5 of Regulation (EU) No 182/2011 of the European Parliament and of the Council in the coming months.

The Commission intends to adopt the Implementing Regulation before the end of 2022."