



Health and Environment Alliance (HEAL)

Response to the public consultation on the COMBINED EVALUATION ROADMAP/INCEPTION IMPACT ASSESSMENT of the proposed revision of the directive on the sustainable use of pesticides – August 2020

The Health and Environment Alliance (HEAL) welcomes the opportunity to comment on the proposed revision of the sustainable use of pesticides directive (SUP). **We are surprised and disappointed at the European Commission’s approach, which proposes to undertake yet another impact assessment in order to implement the objectives set under the Green Deal and Farm-to-Fork Strategy in relation to pesticides use and risk reduction.**

Over a decade has passed since the adoption of the Sustainable Use of Pesticides Directive (SUP), and with it, mounting scientific evidence of the human health and environmental harm caused by the use of synthetic pesticides. The evidence that pesticides play a part in the [burden of diseases](#) associated with environmental pollutants and the ever increasing scientific alarm about their effects on [biodiversity point to the need for a drastic reduction in their use](#). Two United Nations special rapporteurs have [called](#) for phasing out dangerous pesticides, warning that “*excessive use of pesticides are very dangerous to human health, to the environment and it is misleading to claim they are vital to ensuring food security.*” Furthermore, a recent [investigation](#) revealed that the world’s top agrochemical industry players have made more than 35% of their sales from pesticides classed as “highly hazardous” to human health and the environment. **The urgency to reduce the use of synthetic pesticides could not be clearer.**

As mentioned in the roadmap document, significant assessments and reports already exist on the long-known weaknesses identified in the implementation of the SUP (e.g. Court of Auditors [report](#), [REFIT](#) on the Plant Protection Products Regulation). Far from pointing towards the need for yet more evaluations, the latter demonstrate that bolder action is urgently needed to fulfil the framework’s objective “*to minimise the impact of pesticides on human health and the environment through reduced dependency, and through the increased use of low risk and non-chemical pesticides*”. **Under the Farm-to-Fork Strategy, we therefore expect that the Commission finally moves from promises to concrete actions and policy options that focus on implementation and enforcement of existing legislations.**

Here are important ways to strengthen the implementation of the SUP.

1. Fully acknowledge the health and social impacts of pesticides as the departing point of the SUP implementation

As a member-based organisation working on health promotion and disease prevention through policies to reduce pollution, we would like to flag the need to more fully consider the health impacts, particularly at low doses and with regard to vulnerable groups such as pregnant women. In the light of existing scientific evidence on the health impacts linked to pesticide exposure, including serious health conditions and diseases, the section of the roadmap document on “*likely social and health impacts*” needs serious strengthening. In HEAL’s view, Europe’s pesticide reduction targets can only have real-life impacts if they primarily focus on reducing the [use of pesticides](#). Such a reduction would have “*major*” positive health impacts rather than “*some*” impacts - particularly if looking across the lifespan of individuals’ exposure to mixtures of pesticides.

2. Link the implementation of the SUP to that of the plant protection products legislation (PPPR)

Only by implementing the PPPR according to the essential EU principles of precaution and polluter-pays will less harmful pesticides enter the market and the fundamental basis for a good implementation of the SUP be set. Current well-known and documented practices under the PPPR that severely harm the protection of health and environment include: the recurrent acceptance of incomplete evaluation dossiers, granting of authorisation with post-approval data supply for harmful substances, delays in the evaluation process that lead to recurrent administrative extensions, the failure to take into account all of the existing scientific evidence on a substance.

3. Pesticides monitoring must be embedded in mandatory policies and action plans to reduce their use: A clear strategy is needed to effectively reduce volumes (through general and crop-specific use reduction objectives) to support meaningful pesticides monitoring.

Whereas we are in favour of increased harmonised monitoring of, and transparency about, the pesticides volumes sold and used as well as further biomonitoring of pesticides as part of overall more health-oriented policies on chemicals in Europe, the urgency of the situation requires actions, not mere statistics.

As stated on numerous occasions, HEAL supports a 80% reduction targets for synthetic pesticides by 2030 and a full phase out by 2035. We therefore urge the European Commission to roll out a clear action plan to reach such targets.

4. Emphasising technologies is the wrong way to meet the Europe's pesticide reduction targets.

Far from allowing the needed shift towards sustainable agricultural practices, precision farming techniques are mere technofixes that will only avoid addressing the fundamental problem that the current volumes of harmful pesticides entering the market represent.

5. Consider the effective implementation of the SUP through the lens of the Common Agricultural Policy (CAP).

The general absence of vision and proposals as regards to support for farmers in switching to environment- and health-friendly practices as well as the lack of clear links to the Common Agricultural Policy (CAP) in order to reach the SUP objectives is worrying. The roadmap document provides no indications regarding incentives to shift investments and practices across the European farming landscape towards the zero pollution ambition, or possible measures at European and national levels in order to guarantee that substitution systematically takes place when safe options alternatives to harmful pesticides that are still on the market exist and are readily available.

The current CAP system is working against environment- and health-friendly practices, locking farmers in unsustainable farming, putting their own health at most risk, and shutting down any hopes for the



implementation of the SUP objectives to deliver. An effective delivery of the latter will not happen unless the CAP is reformed in a way that subsidies are effectively linked to health- and environment protective practices, supporting farmers in their transition to safe and sustainable farming.