



# HEAL's position on the Public consultation on the Sustainable Use of Pesticides Directive

12 April 2021

The Health and Environment Alliance (HEAL) welcomes the opportunity to participate in the public consultation survey “on the evaluation and impact assessment of Directive 2009/128/EC (SUD) establishing a framework for community action to achieve the sustainable uses of pesticides”<sup>1</sup>. Pesticides in our food, water and air can increase the risk of cancer and infertility, harm children’s healthy development and disrupt our hormonal systems and therefore one of HEAL’s main commitments is to achieve a greater health protection and prevention from pesticide pollution and a pesticide-free future.

HEAL contributed to the adoption of the SUD and has been following its implementation closely and considers its revision crucial in incorporating the Commission’s commitments under the European Green Deal and Farm to Fork Strategy to address chemical pollution including that from pesticides and make a shift to a sustainable food system for Europe. More specifically, in the Farm to Fork Strategy the Commission has committed to (Section 2.1 Ensuring sustainable food production), among others:

- *“take additional action to reduce the overall use and risk of chemical pesticides by 50% and the use of more hazardous pesticides by 50% by 2030.*
- *revise the Sustainable Use of Pesticides Directive, enhance provisions on integrated pest management (IPM) and promote greater use of safe alternative ways of protecting harvests from pests and diseases.”*

## EUROPE HAS FAILED TO REDUCE PESTICIDE DEPENDENCY

There is an increasing body of scientific evidence that pesticide use causes harm to human and environmental health, including that of vulnerable groups such as young children living in proximity to pesticide-treated areas<sup>2</sup>. HEAL would like to recall that SUD was established by policy makers in an effort to address the problems of our current agricultural model on human and environmental health, particularly due to the use of pesticides. Therefore, it is highly disappointing and truly worrying that despite the SUD adoption over a decade ago, the sales and consequently the use of pesticides has increased in Europe. As shown by the reports of the European Commission in 2017<sup>3</sup> and 2020<sup>4</sup> and the Special report of the European Court of Auditors in 2020<sup>5</sup>, the Directive has been poorly implemented by Member States as they have failed to set clear targets to reduce pesticide dependency and ultimately to change their agricultural model.

---

1 <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12413-Sustainable-use-of-pesticides-revision-of-the-EU-rules/public-consultation>

2 Bellanger, M et al, “Neurobehavioral Deficits, Diseases, and Associated Costs of Exposure to Endocrine-Disrupting Chemicals in the European Union” (2015) 100 The Journal of Clinical Endocrinology and Metabolism 1256; Navarrete-Meneses, MDP and Pérez-Vera, P, “Pyrethroid Pesticide Exposure and Hematological Cancer: Epidemiological, Biological and Molecular Evidence” (2019) 34 Reviews on Environmental Health 197; Mostafalou, S and Abdollahi, M, “Pesticides: An Update of Human Exposure and Toxicity” (2017) 91 Archives of Toxicology 549.

3 DG SANTE, 2017. Overview Report on the implementation of SUD 2009/128/EC by Member States

4 DG SANTE, 2020. Report on the experience gained by Member States on the implementation of national targets established in their National Action Plans and on progress in the implementation of Directive 2009/128/EC on the sustainable use of pesticides

5 European Court of Auditors, 2020. Special Report: Sustainable use of plant protection products: limited progress in measuring and reducing risks

## REVISION OF SUD: A NEW OPPORTUNITY TO GET TIME-BOUND, ENFORCEABLE TARGETS TO REDUCE PESTICIDE USE

In line with the Farm to Fork Strategy, the revision of the SUD is an opportunity to ensure that Member States reform their National Action Plans to truly implement its provisions, among them to truly endorse Integrated Pest Management, establish measures to promote the use of safe alternatives to synthetic pesticides and set clear quantifiable targets to reduce the use of and dependency on synthetic pesticides. When Member States fail to comply with the SUD provisions the Commission should take legal action.

More specifically, the revision of the SUD should ensure that:

- Both the Commission and Member States set clear and measurable targets to reduce dependency to chemical pesticides. **HEAL supports a 80% gradual reduction of the use of synthetic pesticides by 2030 aiming at a total phase out by 2035<sup>6</sup>**. These targets should take into consideration human and environmental health impacts and protection of biodiversity, and must reflect the effective protection of conservation areas such as those defined by Water Framework Directive (WFD; 2000/60/EC) and the Birds (2009/147/EG) and Habitats (92/43/EEC) Directives.
- Pesticides in Europe are no longer allowed and are explicitly banned: in areas used by the general public or by vulnerable groups, such as public parks and gardens, sports and recreation grounds, school grounds and children's playgrounds and in the close vicinity of healthcare facilities. HEAL advocated in 2009 for this provision, which was watered down to voluntary measures.
- Integrated Pest Management gets widely established across Europe and the current model of intensive agriculture is replaced by truly sustainable practices: synthetic pesticides are truly used as a last resort, always giving priority to safe non-chemical pesticide methods with the intention to gradually build a pesticide-free agricultural model
- Farmers receive economic incentives to adopt Integrated Pest Management using safe non-chemical pest management methods. Priority is given to farmers who develop nature-based solutions and follow the principles of agroecology.
- Farmers receive economic incentives to protect key conservation and protected areas listed in WFD, Birds and Habitats Directives and penalties when they fail to do so.
- The Commission ensures enforcement of the SUD by carrying out more frequent audits in Member States and taking legal action in case of non-compliance.
- Member States carry out human biomonitoring and environmental monitoring of pesticide exposure and adverse health effects, the costs could be covered by the industry sector.

## CONCLUSION

Europe currently has the opportunity to change its current agricultural model of conventional agriculture that has devastating impacts on human and environmental health. HEAL supports the gradual transition towards a pesticide-free agricultural model, where the methods used in pest-management do not jeopardise the health of farmers, residents of pesticide-treated areas or consumers. This model should consist of nature-based solutions to pest management that work together with nature and promote, rather than destroy, biodiversity.

---

<sup>6</sup> European Citizens Initiative "Save bees and farmers" <https://www.savebeesandfarmers.eu/eng>

## CONTACTS

**Angeliki Lyssimachou, PhD; Senior Science Policy Officer**

Health and Environment Alliance (HEAL)

E-mail: [angeliki@env-health.org](mailto:angeliki@env-health.org)

Tel: +32 2 234 36 43

**The Health and Environment Alliance (HEAL)** is the leading not-for-profit organisation addressing how the environment affects human health in the European Union (EU) and beyond. HEAL works to shape laws and policies that promote planetary and human health and protect those most affected by pollution, and raise awareness on the benefits of environmental action for health.

HEAL's over 90 member organisations include international, European, national and local groups of health professionals, not-for-profit health insurers, patients, citizens, women, youth, and environmental experts representing over 200 million people across the 53 countries of the WHO European Region.

As an alliance, HEAL brings independent and expert evidence from the health community to EU and global decision-making processes to inspire disease prevention and to promote a toxic-free, low-carbon, fair and healthy future.

HEAL's EU Transparency Register Number: 00723343929-96