Feedback on the Sustainable Use of Plant Protection Products Regulation Proposal

INTRODUCTION

The Health and Environment Alliance (HEAL) welcomes the opportunity to provide feedback on the Commission's "Proposal for a Regulation of the European Parliament and of the Council on the sustainable use of plant protection products and amending Regulation (EU) 2021/2115"[1], hereafter referred to as the SUR proposal, which was published on June 22nd 2022.

HEAL has advocated for more significant, faster reduction of pesticide use for well over a decade in order to achieve greater health protection and prevent diseases from the current pesticide pollution across the EU. To do this, the EU needs to promote an agricultural model that does not depend on synthetic pesticides and does not put at risk our health and that of our environment.

HEAL, therefore, welcomes the Commission's SUR proposal, which is a crucial piece of the EU Pesticides Legislation as it will establish, for the first time, the legally binding pesticide reduction targets outlined in the Farm-to-Fork Strategy and the European Green Deal. The new Regulation replaces the 2009 Sustainable Use of Pesticides Directive (SUD), upgrading the legislation from a Directive to a Regulation in order to ensure coherent implementation, enforcement and compliance of the policy among member states. While this change to a regulation is a welcome move, **the proposal falls short in our assessment as it does not set out truly ambitious targets and measures to transition towards an agricultural model that protects health and prevents diseases linked with exposure to harmful chemicals**.

HEAL's assessment of the proposal and our demands for improving it in the next stages of the debate are presented below.

PROTECTING HEALTH REQUIRES SETTING AMBITIOUS PESTICIDE REDUCTION TARGETS AND BANNING PESTICIDES IN SENSITIVE AREAS

Pesticides can have harmful effects on human health and the environment. Exposure to pesticides has been linked to diseases such as certain types of cancer, infertility, pulmonary disease as well as Parkinson's disease and different cognitive disorders[2]. Such diseases may rise mainly from occupational exposures or exposure of residents of agricultural zones. Testimonies from farmers reveal that protecting equipment and mitigation measures are not enough to protect workers or the surrounding environment[3].

Vulnerable groups of the population are also at risk. Scientific studies reveal that children who have grown up in proximity to agricultural fields or other areas treated with pesticides and have been exposed to these toxic chemicals during the sensitive prenatal or early life stages, are at risk of developing a range of blood cancers, cognitive, behavioural and reproductive disorders, as well as tumours of the central nervous system[1].

[1] https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12413-Pesticides-sustainable-use-updated-EU-rules- en

[2] INSERM, 2021. Collective Expert Report "Effects of pesticides on health: New data" https://presse.inserm.fr/en/inserm-publishes-its-latest-collective-expert-review-on-the-health-effects-of-pesticides/43303/

[3] PhytoVictimes Web-series https://webserie.phyto-victimes.eu/

Furthermore, pesticides in food, water and air, are also putting the wider population at risk. Therefore, reducing substantially exposure to pesticides to protect public health is urgent.

PESTICIDE REDUCTION TARGETS MUST BE MORE AMBITIOUS TO TRULY REDUCE DEPENDENCY TO PESTICIDES: 80% BY 2030, NOT 50%

Union and Member State 2030 reduction targets (Chapter II). According to the Commission's proposal, all EU member states should achieve by 2030 a 50% union-wide and national reduction of both the use and risk of chemical plant protection products (PPPs) and the use of more hazardous PPPs.

Although these targets might seem ambitious at first glance, it is worth noting that many of the pesticide active substances currently on the market will most likely be gradually banned or have their use restricted as they do not comply with the approval criteria of the EU Pesticide Regulation 1107/2009 for the protection of human health and the environment. Therefore, if the current legislation is adequately implemented, a significant reduction in the number of active substances should be seen in the coming years.

Furthermore, contrary to what it seems, the proposed pesticide reduction targets will anyways fail to cut the use and risk of pesticides by 50%, for the following reasons:

- **The proposed tools (Annex I and VI) to measure pesticide reduction targets at EU and national level have enormous limitations**: they are indirectly promoting rather than discouraging the use of conventional synthetic pesticides over less toxic ones such low risk pesticides or those used in organic agriculture. This is because these calculations are based on quantities without considering the area treated and without distinguishing between synthetic and organic pesticides or taking into account the different toxicity potential of each substance. Furthermore, they use data from pesticide sales rather than the quantities of the substances used in the fields.

- The exceptions in Article 5.5 & 5.6 allows member states to start measuring pesticide reduction as early as 2011-2013 and to include all the pesticides that have been banned since the EU pesticides law came into force in 2011 in the calculations. **As a result, they could decrease their reduction targets down to 35% (Article 5.8).**

HEAL supports an 80% gradual reduction of the use of synthetic pesticides by 2030 aiming at a total phase out by 2035, in line with the over 1 million European citizens signing the European Citizens Initiative 'SaveBees&Farmers'4 **and a complete ban of the more hazardous pesticides (candidates for substitution) by 2030.**

These more ambitious targets are not utopic. It has been shown that reducing pesticide use while preserving crop productivity and profitability is possible[5]. Integrated Pest Management (IPM), if applied correctly, can reduce insecticide application by 95% while maintaining or even enhancing crop yields through wild pollination conservation[6]. Furthermore, wildlife-friendly farming practices have shown increase productivity in the fields[7].

PESTICIDES MUST BE BANNED FROM ALL AREAS USED BY THE GENERAL PUBLIC, AND THEIR SURROUNDINGS - THE BUFFER ZONE MUST BE 50M OR 100M, NOT 3M

Considering the harmful effects that pesticides can cause on children and vulnerable groups, HEAL has advocated since 2004 to ban the use of pesticides in areas used by the general public, such as public parks and gardens, sports and recreation grounds, school grounds and children's playgrounds and in the close vicinity of healthcare facilities. Therefore, HEAL welcomes the provisions under Article 18 (Chapter V) to prohibit the use of all PPPs in 'sensitive areas', which includes areas used by the general public, vulnerable groups, human settlements as well as areas of

[4] European Citizens Initiative "Save bees and farmers" https://www.savebeesandfarmers.eu/eng
[5] Lechenet et al. 2017. Nature plants, 10.1038/nplants.2017.8
[6] Pecenka et al. 2021. Proc Natl Acad Sci USA 10.1073/pnas.2108429118
[7] Pywell et al 2015. Proc Biol Sci. 10.1098/rspb.2015.1740

ecological importance.

Nevertheless, the proposed 3-meter pesticide-free buffer zone around such areas is absurdly small and will fail to provide any protection from pesticide exposure in these sensitive areas.

A recent systematic review, which examined all scientific literature for non-agricultural exposures in populations living in proximity to agricultural fields due to pesticide drift, showed that pesticides were typically detected in people and house dust at a distance of 30m, 500m or 750m from agricultural fields[8]. Another study in Northern Italy, showed that pesticide residues were detected in children's playgrounds at distances over 50m and proposes that pesticide-free buffer zones should be set at 100m[9]. The degree of contamination depends on the weather conditions, the landscape, the distance from the agricultural fields and the size of these fields treated with pesticides.

The selection of a 3-meter buffer zone to protect people in 'sensitive areas' is therefore, incomprehensible**. HEAL proposes a pesticide-free buffer zone of 50 or 100m depending on the sensitive area under consideration.**

IN A NUT-SHELL – OUR ASSESSMENT AND RECOMMENDATIONS

The Health and Environment Alliance:

- Welcomes the replacement of the Directive with a Regulation in order to ensure coherent implementation, enforcement and compliance of the policy among member states.

- Expresses concerns with the lack of ambition in the current pesticide reduction targets of 50%, and recommends that they should be increased to an 80% reduction in the use and risk of synthetic pesticides, and a 100% reduction of more hazardous pesticides by 2030. The EU should aim for a total phase-out of synthetic pesticides by 2035.

- Considers the proposed tools to measure the pesticide reduction targets (Annex I and VI) unfit for purpose and must be urgently modified to truly promote the use of safer PPPs such as those used in organic agriculture.

- Welcomes the ban of all chemical pesticides in sensitive areas but stresses the need to increase the buffer zone from 3 meters to 50 or 100 meters depending on the type of the area.

- Emphasizes that Integrated Pest Management (IPM) should be better defined to highlight that chemical pesticides should be used always as the last resort when all other alternative pest management methods have been applied and failed, and to promote agroecological practices rather than precision farming. Gene editing and seed coating must not be considered IPM.

- Highlights that farmers should be supported throughout this transition, both economically as well as in terms of resources and access to information about non-chemical methods of pest management. Training and advisory services should be independent and not provided by the companies whose objective is to sale their products.

[8] Teysseire et al 2020. Sci Tot Environment 10.1016/j.scitotenv.2020.143294
[9] Linhart et al. 2019. Environ Sci Eur 31, 28 (2019). 10.1186/s12302-019-0206-0