

Warsaw, 8th July 2022

Mrs. Stella Kyriakides
Commissioner for Health and Food Safety
DG SANTE

Mr. Janusz Wojciechowski
Commissioner for Agriculture and Rural Development
DG AGRI

Mr. Virginijus Sinkevičius
Commissioner for Environment, Oceans and Fisheries
Dg ENV

Dear Commissioners,

We call for urgent all measures to be taken to adopt legal provisions to reduce the use (and risk) of chemical plant protection products in agricultural production and to create conditions for the implementation of the ambitious goals of the European "Farm to Fork" Strategy - a 50% reduction in the use and risk of chemical agents plant protection by 2030

On June 22nd the EU Commission presented important proposals for legislation on the reduction of pesticide use and restoration of nature, combined with support for farmers. You can watch the presentation and the documents [here on the EU website](#).

The proposals come at an important moment. The Russian aggression in the Ukraine shows the vulnerability of industrial farming, based on fossil fuel and external inputs such as feed, fertilizers, and pesticides. These products lead to the destruction of biodiversity and climate change. Now it is even more important to move towards sustainable food security, based on healthy soils, clean water, crop rotation and maximum biodiversity.

We are happy to see that the pesticide reduction proposals have finally been published. Now the democratic process in the EU and national parliaments can start.

Unfortunately, Poland has been leading a group of 12 EU countries [opposing the new legislation](#), even before it was presented. We think this is a mistake. Polish farmers and citizens and our nature could profit from the new regulation. Farmers can use CAP money to work with nature, with lower costs and without loss of production. Our health, wellbeing, soils, water and nature would be grateful.

We ask you to make Poland stop opposing the necessary change, but instead work together with other EU countries on ambitious legislation to help nature,

biodiversity, health, farmers income and a future for the generations after us. Help to improve the plans, for the proposals are a good step, but 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 and food security in the long term.

The regulation will replace the 2009 Sustainable Use of Pesticides Directive, which aim was 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 this 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.
- The total pesticides use has not significantly decreased.
- The 55 most toxic pesticides that should have been phased out long ago are all still there
- 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.

So we have lost 13 years since the introduction of the SUD directive.

Swift action is now extremely urgent 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, aquatic life is suffering and many birds have disappeared. Soil life, the basis of soil fertility has 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 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 should be treated as harmful substances and regulations should be improved.

Therefore, we ask you to take the following actions:

- Help to improve the proposed legislation on pesticide reduction
- 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.
- Use CAP subsidies and mobilise additional financial resources to support farmers in making the necessary transition towards a toxic-free agriculture. Link CAP funding to pesticide reduction objectives.
- Take all Highly Hazardous Pesticides (HHPs) off the market immediately.
- Stop derogations to continue using banned pesticides.
- 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.
- Biodiversity crisis is a global problem. Stop the export of banned pesticides.
- 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 of the use and risk of pesticides.
- Use proper statistics on pesticide use in the statistics on agricultural input and output

Every country will decide on its position and react to the proposal. We ask you to ensure that our country 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.

Our members and supporters and the citizens that signed the Save Bees and Farmers initiative will be very interested to see what is happening with their demands. Please listen to these demands and make sure that the use of pesticides becomes an exception rather than the norm.

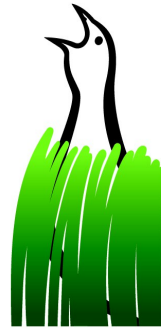
Respectfully yours,
on behalf of the Coalition Living Earth
(Koalicja Żywa Ziemia)
on behalf of the Coalition Agriculture for Nature
(Koalicja Rolnictwo dla Przyrody)

Coordinator of the Coalition Living Earth





koalicja żywa ziemia



**KOALICJA
ROLNICTWO
DLA PRZYRODY**