

Symposium on Feeding Europe while reducing pesticides dependency.

European Parliament, Brussels, 19 November 2015.

Chairman's conclusions

1. BACKGROUND

The benefits of feeding Europe while reducing pesticide dependence will be widespread and seen across the entire food industry from farmer and worker to consumer, from producers of plant protection products to those responsible for the provision of clean drinking water, from biodiversity to soil health.

The regulatory mechanisms are largely in place, the benefits documented and the challenges still posed known. Yet, while progress has been made, there is a huge road to be travelled to achieve a commonly shared vision. Civil society is well entitled to ask, given that the end point is agreed, why is there such slowness in getting there and to question how serious is over 20 years of EU commitment to sustainable agriculture and 25 years of relevant pesticide legislation.

2. THE 2015 SYMPOSIUM

The fourth symposium was held at the European Parliament on 19 November 2015, organised by PAN, IOBC-WPRS, IBMA, EuroCoop and Greenpeace and hosted by Pavel Poc MEP. It followed format of previous meetings and again drew significant interest and attendance from the industry. In addition to the formal speeches, 8 Members European Parliament came on stage and participated in the various debates underlining the subject's great significance at EP level.

The principal themes were sustainability and innovation but the meeting also dealt with policy, specifically progress on the implementation of the Sustainable Use of Pesticides Directive (SUDP) and took an in depth look at the apple sector.

3. IS PROGRESS BEING MADE?

To determine progress towards feeding Europe with less reliance on pesticides, it is important to distinguish between the various elements involved and the overall ambition.

On individual items within the wide legislative remit, principally the SUPD, such as training, registration of users, care of equipment and early warning systems, progress appears to be made at least in some countries and activities such as new approaches at municipal level are gaining ground. Greater citizen concern regarding use near schools and hospitals is also evident. These are encouraging steps of a building block variety and should yield results in coming years. Nevertheless, welcome as they are, they represent individual and isolated measures rather than systematic improvement.

Progress towards Integrated Pest Management (IPM) in the apple sector provides a picture where historical difficulties relating to pesticide use are significant. New orchard architecture including fruit walls is contributing to mechanisms to reduce labour costs, water and pesticide use and drift without any reduction in yield. Residue levels in apples are down significantly so the situation can be reasonably described as improving. Nevertheless, European orchards are still subject to 30-35 pesticide applications annually which is hardly yet at a level where environmental sustainability is achieved. Some biological tools to combat pests are being used (eg. Pheromones and baculoviruses) and machines are being developed to facilitate thinning, but clearly not nearly enough. Soil and water pesticide residues are still significant although some of these residues are from pesticides no longer approved or used. So further

work is necessary, especially to ensure uptake of alternative techniques and introduction of nature back into the field among others to attract natural predators and pollinators.

More fundamental difficulties are seen when examining IPM uptake as a whole. It is, therefore, useful to examine the blockages to IPM described at the 2013 symposium to see if progress has been made;

- The registration process for pesticides was seen as unfit for biological control and other low risk substances. Major blockages arise due to the length of the process which is exceedingly onerous for Small and Medium Enterprises. American chemical/biological two stream or EU medical models need to be examined to see if they are more appropriate. Expertise within registration authorities regarding biological control needs urgent attention so that there is real, long term knowledge within the regulatory authorities. The 2015 symposium indicated no progress on this issue.
- The lack of research, including publicly funded research, into biological control and other non chemical methods needing to be addressed in both EU and Member State programs was highlighted. No progress was reported in 2015.
- There is an absence of biocontrol centers of knowledge and dissemination. This is linked to the lack of knowledge and expertise by advisers and of uptake by farmers. Innovation notably within the Common Agricultural Policy (CAP) should be used to address this deficit. Little progress was reported in 2015.
- Limited interest by some major plant protection companies in IPM as a system is perhaps due to an inbuilt conflict with pesticide use as a first rather than a last resort. The non-inclusion of external costs related to pesticide use such as through a pesticides tax may be playing a role in this limited interest. No progress was reported in 2015.
- There is a serious lack of ambition displayed by the vast majority of Member States with respect to their National Action Plans (NAPs) to be developed under the SUDP. This lack of ambition is seen not just in the fact that many Member States were far behind their time related obligations but also in the extent, clarity and coverage of the plans. Business as usual rather than the achievement of the directive's goals appeared to be the only common thread across the plans. No significant change and due to the continuing absence of a detailed Commission report to date, a significant missed opportunity for public discussion and the de facto encouragement of further procrastination.

To the above can be added the paradoxical situation whereby the SUDP is not yet, nor is there any date foreseeable, included within the applicable cross compliance mechanism of the CAP. In fact, there is a strong incentive not to implement it precisely to prevent its inclusion. Additionally, the outcome of the 2014 CAP reform has not been helpful on issues such as compulsory rotations. This gives an unclear and unhelpful signal to producers regarding its value as a basic tool of IPM and indeed weakens possibilities in the CAP prior to this date for Member States to require rotations within the cross-compliance mechanism.

4. ARE IPM VISIONS DIFFERENT?

There are several definitions of IPM ranging from the very ambitious to the regulatory.

The ambitious definition states that it is - " A durable, environmentally and economically justifiable system in which pest damage is prevented through the use of natural factors limiting pest population growth and, IF NEEDED, supplemented with other preferably non chemical methods".

The SUPD states that Member States shall take all necessary measures to promote low pesticide-input pest management (including IPM) giving wherever possible priority to non-chemical methods, so that professional users of pesticides switch to practices and products with the lowest risk to human health and the environment among those available etc.

It is emphasized that very many aspects of IPM are not new and were practiced by generations of farmers as part of routine crop husbandry. Practices such as crop rotation, use of resistant varieties, under sowing, intercropping, protection of pollinators (and some predators), physical and mechanical weed control, build up and enhancement of soil organic matter, soil structure and water retention capacity have been part of good farm practice for centuries. The fact that monoculture and continuous arable land use are now common practice has weakened many standards of good farm practice and soil protection. The use of chemical controls and more inorganic fertilizers has allowed farmers pay less attention to some aspects of good practice while not suffering yield loss and sometimes increasing it. The reduction in organic matter in arable soils is not just deeply concerning from the carbon storage capacity perspective but also with respect to microorganisms, their energy and variety helping plants to better resisting diseases. If adherence to continuous arable and especially monoculture is not broken, then it is difficult to envisage that arable land will continue to retain its productive capacity without high levels of pesticide and inorganic inputs so a return to traditional concepts is necessary even if the mechanisms change.

Newer, though by no means recent inclusions within the broad IPM/good practice concept are monitoring, forecasting and warning systems and their development is still work in progress needing support and dissemination. Likewise the need for “flower and beetle banks” providing food for beneficial insects especially since so many landscape features have been removed across Europe in the last half century in order to maximise financial support as much as for ease of large machinery use. Training with respect to care in actual pesticide use is well advanced. The extent to which more generalised IPM is being encouraged through rural development and other programmes is not yet clear and should be the focus of study as a matter of urgency.

Perhaps the real gap in appreciation with respect to IPM is the different views about the feasibility of the almost top of the pyramid biological control notably in comparison to chemical control. Investment in chemical control has been a feature of crop production for a century. Biological control has a shorter history, a lesser importance to date and is seen as niche rather than mainstream. The barriers to its expansion as an important part of crop production are certainly regulatory but they are also financial, entrepreneurial and on the side of the broader industry a lack of full belief. All these aspects must be overcome if IPM is to reach full expression. There is a place for imaginative scientists and entrepreneurs but there is also a major opportunity for today's major chemical pesticide producers. Working to improve sustainability in crop production, particularly in the light of the EU commitment to a toxic free environment as announced in the 7Environment Action Programme (EAP) requires innovation but the rewards are great. If European companies lead the way, then these rewards will be financial as much as environmental and health beneficial.

5. REFLECTION

Considerable progress has been made in reducing pesticide use in the EU. The legislation and policy support provide obligations and opportunities to apply, at farm level, principles which could lead to further progress. Nevertheless, the Member States implementation reports under the SUPD appear to suggest little or limited ambition. This is disappointing given the benefits

for society and the general welcome for improved use across the industry.

The Commission implementation report on the SUPD NAPs has been delayed for more than a year giving a worrying signal of lack of urgency in addressing the pesticides issue and, by extension, related issues of human health, water and biodiversity protection. The report is now expected in early 2016 and should then be widely debated not least by civil society and the European Parliament but also the Council under the Dutch presidency. Debate is required so as to clarify the situation regarding the extent of implementation, pitfalls and successes, and to stimulate action to garner all potential benefits. There is an inherent risk that implementation of the directive could fall into a backwater without the stimulus of their active interest especially due to the delay. This would encourage real progress and avoid the tedium of recourse to infringement procedures. Positive cooperative implementation has to be the goal. Implementation reports on legislation are required on a regular basis and delay in the 2014 report needs to be avoided in 2018.

The relationship between the SUPD and the CAP is unsatisfactory with respect to cross-compliance. However, what is not yet clear is the extent and detail of how the rural development programmes for the current period are being used to address broad pesticide issues. It would be helpful for the Commission to complete work in this area as a matter of urgency in the form of an informal report and as a complement to the SUPD report. This would allow a more informed debate and help clarify future direction.

6. RECOMMENDATIONS

It is essential that the Commission now publish the SUPD report and the accompanying Food and Veterinary Organisation report. Four further approaches are recommended. These are:

- That the European Parliament, in its response to the European Commission report, prepares its own report on what's going well and what poorly at Member State level so as to focus efforts towards full implementation of the SUPD and garner the potential inherent in IPM.
- That the Commission prepares a Roadmap to full IPM which would provide targets and dates for staged but full implementation. The roadmap should deal systematically with all the blockages via cooperative work with the sector, stimulation of farmers through relevant funds where appropriate and progressive legislation where required. Ideally, in preparing this roadmap, all relevant parties should be encouraged to play a constructive role. The Commission's report on SUPD implementation should launch this work. In doing so, a very positive approach could be to set a series of interim targets such as on registration, research and innovation, the full uptake of good farm practice, the extent of IPM uptake within the lifetime of current plans and the extent of biological control and reduction of pesticide use to be achieved.
- The pesticides production industry should now produce a visionary document on what it sees as being required to move to IPM and notably biological control before recourse to chemical pesticides. Doing so could open the possibility for innovation to a far greater extent than today and allay fears that IPM is not a business opportunity.
- In addition, to the extent that they can garner the finances to do so, the Non Governmental Organisations (NGOs) concerned by pesticides issues might consider the value of a league table charting progress at individual crop level of progress towards sustainable use and the implementation of IPM. If possible, this would make a distinction between permanent fruit crops, vegetables and general crops such as cereals, maize, sugar beet, sunflowers etc. The aim would be to inform society of progress but also to stimulate all sectors to improve performance and provide proof of achieving ever higher standards of health and environmental standards.