



Agroecology Europe Response to the feedback consultation on the Commission's Proposal for a regulation on the sustainable use of plant protection products (SUR)

Brussels, Monday 19 September 2022

Agroecology Europe, the European Association promoting agroecology as a set of practices, a science and a movement across Europe, welcomes the opportunity to give feedback on the Commission's Proposal for a regulation on the sustainable use of plant protection products (SUR).

The revision of the directive on the sustainable use of pesticides (SUD), the proposal for a sustainable use regulation (SUR) entails a high level of protection for human health and the environment in the transition to a sustainable food system, which involves a reduction in dependence on synthetic pesticides and a redesign of the EU's farming and food systems. Ambitious and legally binding reduction targets in pesticide use and risks will also support the achievement of various other EU environmental goals such as those enshrined in the Water Framework Directive and the Nitrates Directive.

However, without significant improvement, the EU will fail to achieve its commitment to reduce pesticides use and transition towards more sustainability of the EU food system. Reducing the use and systemic dependence on synthetic pesticides must be placed at the heart of a systemic approach enabling the redesign of farming and food systems. Not only farmers, but all food system stakeholders - including farm advisors, suppliers, upstream and downstream suppliers, consumers - need to take action to make the changes necessary to achieve the objectives set out in this regulation. This is why we encourage the Commission, Parliament and Member States to adopt a systemic approach on farming and food system redesign rather than less ambitiously targeting specific crops and optimising the use of pesticides, and therefore consider broader measures to support the actions required by this regulation.

We therefore insist on the importance of integrating agroecology in this Regulation proposal formulated by the Commission. This can be achieved through the following key points:

- Agroecology should be clearly defined and mentioned as a solution into the SUR proposal (Art. 3)
- An adapted set of indicators to monitor the use and risks of pesticides should be implemented (Chapter IX)
- Farm advisory services should be developed and properly to support farmers in the redesign of their farming systems and phase-out of chemical inputs (Art. 26).
- The policy consistency between the SUR and other key agricultural policies - in particular the Common Agricultural Policy - should be insured

1. *Agroecology Europe* calls on adding a definition of Agroecology into the SUR proposal (Art. 3)

“Agroecology is one approach that, by designing agroecosystems that rely on ecological processes for the prevention and control of pests, weeds and diseases outbreaks, shares the same aims of IPM and organic farming. Agroecology also includes societal and economic aspects that support and connect producers and consumers.”

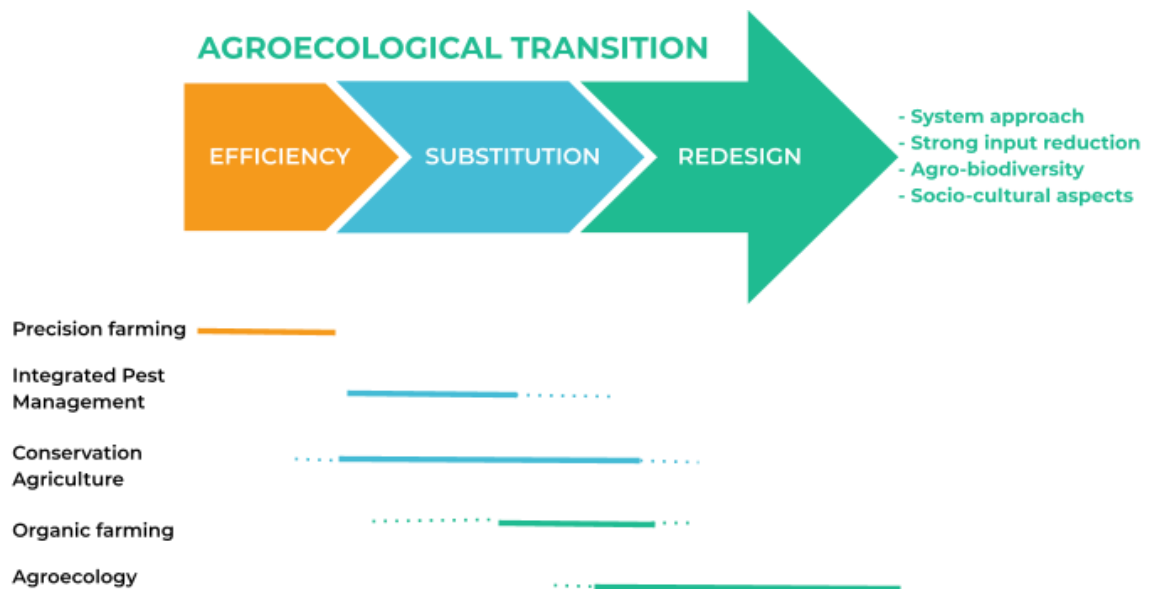


Figure 1. The three stages of agroecological transition.
Source: Adapted from Bärberi (2021) and based on Hill and MacRae (1995)

We regret that the Commission defines precision farming as the tool to reduce pesticide dependency and presents biological pest control methods as a unique alternative to fight pests and diseases. Agroecological practices such as long crop rotations, the insertion of legumes in rotations, reduced tillage, soil cover, the implementation of an ecological network and the synergy between crop and livestock systems are key practices that enable the significant

reduction of pesticide use while maintaining similar yields¹ and improving the economic performance of European farms².

Unlike agroecological practices, precision agriculture does not allow farmers to structurally reduce the pesticide dependency, thus reinforcing a lock-in effect on the use of pesticides³. Precision agriculture increasingly requires the use of advanced technologies which are costly and may be unprofitable for farmers. They can therefore accelerate the bankruptcy of family farms and marginalise the cultural heritage and traditional know-how associated with them. The significant investment that precision farming can generate for producers can also represent a major obstacle to the transition to sustainable agriculture and food systems. European farms are already subject to overcapitalisation, which makes it difficult to transfer them to the next generation. *Agroecology Europe* recalls the importance of considering the social, cultural, economic and environmental impacts associated with certain technologies and stresses the several limits of the so-called techno-fixes to improve the sustainability of food systems.

2. *Agroecology Europe* calls for the implementation of an adapted set of indicators to monitor the use and risks of pesticides (Chapter IX)

Agroecology Europe recalls that the adoption of relevant indicators and transparent data collection systems at the EU level to monitor the use and risks of pesticides is central to accompany the change of practices across Europe toward more sustainability.

In this regard, the harmonised risk indicators (HRI 1 and 2) should be substantially improved as they are not suited for measuring pesticide use and toxicity and do not take into account the land area treated. This indicator leads to a systematic underestimation of the risk of synthetic chemical pesticides. Without improvement of this indicator, the whole regulation and the objective of reducing pesticide use will be seriously affected. We invite the EU co-legislators to improve the set of indicators mentioned in the SUR and to draw on more comprehensive indicators such as the Number of Dose Unit⁴ (NODU) developed by the French authorities to monitor the progress in achieving their national action plan for the reduction of pesticides.

¹ Tamburini, G., Bommarco, R. & Wanger T., Kremen, C., Van der Heijden, M. & Liebman, M. & Hallin, Sara. (2020). Agricultural diversification promotes multiple ecosystem services without compromising yield. *Science Advance*

² van der Ploeg J.D, Barjolle D., Bruil J., Brunori G., Costa Madureira L.M., Dessein J., Drag Z., Fink-Kessler A., Gasselin P., Gonzalez de Molina M., Grolach K., Jürgens K., Kinsella J., Kirwan J., Knickel K., Lucas V., Marsden T., Maye D., Migliorini P., Milone P., Noe E., Nowak P., Parrott N., Peeters A., Rossi A., Schermer M., Ventura F., Visser M., Wezel A. (2019) The economic potential of agroecology: Empirical evidence from Europe. *Journal of Rural Studies* 71: 4

³ Neumaster, L. (2022). Locked-in Pesticides : The European Union's dependency on harmful pesticides and how to overcome it. Foodwatch

⁴ <https://agriculture.gouv.fr/quest-ce-que-le-nodu>

3. *Agroecology Europe* calls for the development of independent Farm Advisory Services that properly support farmers in the redesign of their farming systems and phase-out of chemical inputs (Art. 26)

Agroecology implies a shift from chemical-intensive agriculture towards knowledge-intensive agriculture. Providing appropriate technical support and training for farmers through the development of independent farm advisory services all over Europe is therefore a key element of a drastic pesticide reduction policy in Europe. *Agroecology Europe* welcomes the Commission's proposal to set up independent Farm Advisory Services as formulated in Art. 26, decoupled from upstream and downstream industries having an economic interest in the production and sale of pesticides and synthetic fertilisers.

Farm Advisory Services must include and focus on innovative practices, agricultural techniques for resilience to climate change and to restore biodiversity, including agroforestry and agroecological approaches as mentioned art. 15 of new CAP Regulation 2021/2115.

4. The policy consistency between the SUR and other key agricultural policies - in particular the Common Agricultural Policy - must be insured

Agroecology Europe calls the Commission to ensure that the budget of the Common Agricultural Policy is targeted to support farmers technically and financially in the adoption of agroecological practices and the phasing out of pesticide uses. In that sense, it is particularly important to strengthen the eco-schemes and pillar 2 measures of the CAP.

Agroecology Europe calls on the Commission to set up an inclusive and transparent process for the approval of national action plans (NAPs). Those should be reviewed and approved by the Commission and an expert group consisting of independent and environmental scientists and civil society to ensure transparency and independent scientific advice (Art. 8).

Agroecology Europe is at the disposal of the Commission, the Parliament and Council for any request and would be pleased to offer expertise to support the legislative building process.

For further information, please contact our secretariat:

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