



European Economic and Social Committee

NAT/331
Sustainable use of
pesticides

Brussels, 14 March 2007

OPINION

of the

European Economic and Social Committee

on the

**Proposal for a Directive of the European Parliament and of the Council establishing a
framework for Community action to achieve a sustainable use of pesticides**

COM(2006) 373 final – 2006/0132 (COD)

On 15 September 2006 the Council decided to consult the European Economic and Social Committee, under Article 175 of the Treaty establishing the European Community, on the

Proposal for a Directive of the European Parliament and of the Council establishing a framework for Community action to achieve a sustainable use of pesticides
COM(2006) 373 final – 2006/0132 (COD).

The Section for Agriculture, Rural Development and the Environment, which was responsible for preparing the Committee's work on the subject, adopted its opinion on 19 February 2007. The rapporteur was Mr Pezzini.

At its 434th plenary session, held on 14 and 15 March 2007 (meeting of 14 March), the European Economic and Social Committee adopted the following opinion by 147 votes with 3 abstentions.

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1. **Conclusions and recommendations**

- 1.1 The EESC agrees that it is important to make the use of pesticides more sustainable, so as to optimise their beneficial effects and reduce their adverse effects on farming, the environment, the consumer, operators and society as a whole.
- 1.2 The EESC welcomes the Commission's proposal in principle, in that it addresses an issue of great importance as regards the European public's well-being, safeguarding the quality of life and of the ecosystem, and rural development, and, moreover, as regards a positive product trend ensuring that products remain competitive on the internal and international markets, with continual improvements in quality.
- 1.3 The EESC agrees that action plans should be drawn up at national level to identify the objectives in respect of reducing risk and to launch a genuine EU harmonisation policy.
 - 1.3.1 The plans' provisions must be converted into appropriate national, regional and local measures, in particular taking into consideration the three dimensions of sustainability, i.e. economic, social and environmental impact.
- 1.4 The EESC believes that training and information campaigns are essential to achieve rational, sustainable use of crop protection systems, avoiding potential adverse environmental impact.
 - 1.4.1 Training must be extended to all stakeholders, including public authorities and bodies and non-professional users. Clearly, national training systems, which are already managed by properly approved bodies, must be preserved.

- 1.5 The EESC believes that awareness-raising campaigns should be objective and neutral, highlighting the benefits for crops and the risks and targeting non-professional users in particular, especially local public bodies and authorities.
- 1.6 When introducing precautionary measures in particularly sensitive contexts, as when laying down rules on aerial spraying, the EESC believes that it would be preferable to ensure a certain degree of subsidiarity.
- 1.7 The EESC feels that it is important for due consideration to be given to agricultural and plant protection research, in order to minimise the risk which is always present when chemicals and mixtures of chemicals are used.
- 1.8 The EESC believes that due attention should also be given to cooperation, both with international bodies such as the FAO, the OECD and the WHO and with neighbouring regions.
- 1.9 Globalisation of the agricultural and food markets calls, in the EESC's view, for a Community initiative to disseminate European production and health standards internationally, in particular by incorporating them into the Codex Alimentarius.

2. **Reasons**

- 2.1 The term pesticides denotes active substances and products designed to influence fundamental processes in living organisms and which, therefore, have the potential to kill or control harmful organisms¹. However, the Commission proposal also uses the more specific term "plant protection products"².
- 2.2 Pesticides are considered to be essential to protect crops from insects, rodents and natural pathogens, but they can also accumulate in the environment and cause serious risks to human and animal health, particularly when they pollute drinking water. The potential risks in humans include cancer, genetic disorders and permanent damage to the immune system.
- 2.3 Risks to human health can occur through direct or indirect exposure, misuse or accident, in particular during or after use in agriculture, landscaping and other activities.
- 2.4 The risks related to each individual active substance contained in pesticides are evaluated during the relevant authorisation procedures, but there is no satisfactory assessment at

¹ *International Code of Conduct on the Distribution and Use of Pesticides* (FAO, November 2002), Art. 2 of Resolution 1/123, of the 123rd Session of the FAO Council, 2002.

² Cf. COM(2006) 388 final, Article 2(1).

Member-State level of the effects of exposure to mixtures of chemicals. Thus, as things stand, it would be very difficult to evaluate the overall impact on human health of all substances currently in use³.

- 2.5 Indirect exposure of bystanders, residents (*via* spray drift) and those who could be described as consumers (*via* residual amounts in agricultural produce or water) can be even more serious for especially vulnerable population groups. In particular, recent research⁴ has shown the special sensitivity of foetuses whose neurological development has been affected when their mothers are exposed to pesticides.
- 2.6 Account must be taken of risks caused to the environment by unintended and excessive flows of chemical substances to water, air and soil, resulting in adverse effects on plants, wildlife, quality of the environmental compartments and biodiversity in general.
 - 2.6.1 At the same time, the fact must not be overlooked that modern society relies on a wide range of fertilisers, biocidal products, food additives, insecticides, pesticides and herbicides, with numerous beneficial effects in terms of higher levels of food safety and quality.
- 2.7 If used responsibly, they guarantee the availability on the market of high-quality fruit and vegetable produce, raw materials and foodstuffs at low prices which are affordable for all consumers. The use of crop protection products ensures high yields, reduces the levels of natural toxins produced by fungi and bacteria, reduces crop losses and helps to secure sufficient, sustainable food supply on the internal and international markets.
 - 2.7.1 Moreover, all fungicides, insecticides and herbicides are already subject to a rigorous approval process before marketing and use are authorised.
- 2.8 The EESC agrees that it is important to make the use of pesticides more sustainable, so as to optimise their beneficial effects and reduce their adverse effects on the environment, the consumer and operators: this would also improve the image of operators and farms which use plant protection products prudently.
- 2.9 The EESC believes that more emphasis should be placed on the potential benefits for farmers of more rational, judicious use of plant protection products. Farmers themselves have, for some years, been engaged in developing more rational techniques such as Integrated Crop Management and Integrated Pest Management with a view to promoting integrated farming in a more tangible way, and this trend should be encouraged.

³ It should be noted that, at international level, there are already methodologies widely in use, particularly in the United States of America. See <http://www.epa.gov/ord/htm/innovations.htm>.

⁴ Developmental neurotoxicity of industrial chemicals, Lancet 2006; 368:2167-78.

- 2.10 The real challenge of the future is not just to provide high-quality, safe conventional and organic products to the "most discerning" consumers, but also to satisfy those seeking products which are both reasonably priced and of guaranteed quality.
- 2.11 The problems involved in integrating environmental issues into the use of pesticides are covered by the priorities outlined in the Sixth Community Environment Action Programme 2002-2012, which provides for the development and implementation of seven thematic strategies.
- 2.12 There are clear interactions between the recommendations in the thematic strategies adopted – particularly the strategies on the protection of ground water and natural fauna and flora, soil protection, waste management, and residues and packaging – and the proposal for a framework directive.
- 2.12.1 The Thematic Strategy on the Sustainable Use of Pesticides sets out four new measures for environmental and health protection, including the proposal for a directive establishing a framework for more sustainable use of pesticides, which is addressed by this opinion.
- 2.12.2 The Commission has also drawn up an impact assessment of the various scenarios which might result from the implementation of the measures laid down for sustainable use of pesticides and their cost: *"losses (for the PPP industry and for farmers paying for training and the certification and maintenance of application equipment) and benefits (for less consuming farmers, and training, maintenance or certifying firms) are equal."*⁵
- 2.13 The net overall impact, considering the reduced externalities, is thus clearly positive: *"Extrapolation from a comprehensive study in Germany leads to the conclusion that the optimised use in pesticides should create an overall benefit to the EU which would exceed EUR 200 million each year, through reduced externalities such as adverse effects on the environment and human health."*⁶
- 2.14 The EESC has already, in 2003⁷, expressed support for the Commission's effort to draw up a thematic strategy on pesticides. The EESC feels that explicit mention should be made of both the crop protection role of pesticides, and other techniques, i.e. biopesticides, plant extracts, prevention methods, organic methods and plant resistance to certain pests, the risks and benefits of which must be assessed on a sound scientific basis.

5 Cf. SEC(2006) 914, point 5, second paragraph.

6 Idem.

7 CESE 68/2003, OJ C 85 of 8.4.2003, pp. 112-118.

3. **The Commission proposal**

3.1 The Commission proposal seeks to protect human and animal health and the environment from the hazardous, inappropriate or excessive use of pesticides in farming and the ecosystem, reducing the risks and adverse impact of pesticide use "in a way that is consistent with the necessary crop protection".

3.2 It provides, in particular, for:

- mandatory establishment of National Action Plans (NAPs) to identify types of crops, activities and areas of higher risk which should be addressed as priorities, with the involvement of stakeholders in the setting-up, implementation and adaptation of the NAPs;
- creation of a system of training and awareness-raising for distributors and professional users of pesticides, and of information for the general public through awareness-raising and information campaigns;
- mandatory regular inspection of application equipment in order to reduce adverse impacts of pesticides on human health and the environment during application;
- prohibition of aerial spraying (with derogation possible), to limit the risks of adverse impacts on human health and the environment;
- specific measures to protect the aquatic environment from pollution by pesticides;
- defining areas of reduced or zero pesticide use (ZPU) in line with measures taken under other legislation;
- handling and storage of pesticides and their packaging and remnants (pesticides life cycle);
- development of Community-wide standards on Integrated Pest Management (IPM) – mandatory as of 2014 – and establishment of conditions for implementation;
- a system of harmonised indicators for the mandatory collection and reporting of information on the placing on the market and use of pesticides, to measure progress in overall risk reduction.

4. **Comments**

4.1 The EESC welcomes the Commission proposal in that it addresses an issue of great importance as regards the European public and consumer's well-being, safeguarding quality of life, farming and the ecosystem.

4.2 Annual world pesticide sales are estimated at EUR 25 billion and the use of pesticides is still very high in developing countries, even though these markets are sluggish or shrinking⁸. Moreover, globalisation of agricultural and food markets calls for increasingly careful

⁸ Resolution 1/123, FAO Council 11/2002 (www.fao.org).

compliance with appropriate production and health standards of the Codex Alimentarius by all concerned, to prevent these markets suffering the effects of Gresham's law as well⁹.

- 4.3 Moreover, in various parts of the world, a huge quantity of pesticides is wasted or used needlessly, and a large number of people suffer from poisoning because farmers, operators and local authorities do not know or have not been updated about new technological applications and because the equipment used for pesticides is often obsolete or poorly maintained. In addition, dangerous substances already banned in the EU are still in use in developing countries¹⁰.
- 4.4 The EESC believes that the introduction of National Action Plans incorporating quantitative targets and implementation schedules is particularly necessary in order to define measures geared to the need to reduce risks, at national, regional and local level, taking into consideration the three dimensions of sustainability, i.e. economic, social and environmental impact.
- 4.5 The socially responsible use of crop protection products is essential to achieve increasingly advanced social objectives, ensuring that farmers discharge their responsibilities in the food chain and produce high-quality foodstuffs for consumers, while also securing sufficiently high levels of agricultural competitiveness on both the internal and international markets as regards the Lisbon Strategy.
- 4.6 The economic dimension of sustainability ensures that products are only used to the extent necessary to keep the various diseases below the danger line, thus increasing yield and farm product availability as well as reducing the costs of farm management.
- 4.7 As regards the environment, the risks caused by the excessive accidental presence of chemical substances in water, soil, air and processed farm and food products would be avoided. These substances are harmful to man, flora and fauna, the quality of the environment and biological diversity in general. At the same time, it must be borne in mind that it is essential to prevent the spread and proliferation of plant diseases.
- 4.8 In order to avoid distorting competition in the internal market, the measures adopted when National Action Plans are introduced should be based on directives and criteria which are common to the whole of the EU.
- 4.9 Education, training and information campaigns are essential to achieve rational, sustainable use of crop protection systems, and for ensuring that best farming practices are used and avoiding potential adverse environmental impact. Integrated training of all stakeholders,

⁹ http://en.wikipedia.org/wiki/Gresham's_Law.

¹⁰ For example, lindane was banned from the EU market in 2005 and it is still in use in developing countries.

including public authorities and bodies and non-professional users, is of particular importance here.

- 4.10 Member States have set up different training systems, based on national provisions and legislative requirements and managed by properly approved bodies. The EESC therefore believes that a flexible Community reference framework is necessary in order to cater for the needs of different user groups. It could be based inter alia on teaching methods and course content agreed on by stakeholders at European level¹¹ and discussed as part of a sectoral dialogue between the social partners in each country.
- 4.11 The same may be said of information and awareness-raising campaigns, which must be objective and neutral, on the benefits of potential crop protection practices and the risks of harmful effects. These campaigns could be financed in the individual Member States by means such as a tax levied on crop protection products. The funds obtained in this way could be channelled into resources such as simple technical guides updated online to raise awareness among users, particularly non-professional users.
- 4.12 The EESC believes that it is essential for Member States to set up a system for regular technical inspection and maintenance of pesticide application equipment in use, on the basis of common, harmonised standards founded on essential requirements.
- 4.13 As regards the introduction of precautionary measures in particularly sensitive contexts, such as the protection of water¹² - which must be in line with the Water Framework Directive - and the sectors defined by Natura 2000, local conditions and types of crops such as rice need to be taken into account.
- 4.13.1 In the EESC's opinion, it is important to ensure that best practices are followed to reduce risks, laying down balanced, sensible common provisions and minimum parameters. The choice of measures and stringent monitoring thereof should be the responsibility of the Member States. The Committee is not in favour of a general ban, as it feels this would be excessive.
- 4.14 As regards the introduction of stringent restrictions on aerial spraying, the EESC believes that careful consideration should be given to the fact that there are geographical areas and situations where no other technique is feasible. In such circumstances it might be appropriate to allow only very limited derogations for this kind of operation, so as to secure the greatest possible level of safety and professional skill among operators and thus avoid adverse effects on human health and the environment. Member States and the various tiers of public authority

¹¹ Cf. ECPA *Training resource for trainers on ICM and Guidelines on the Sustainable use of crop protection products*.

¹² Cf. best practices introduced under Directive 91/414.

responsible should use standardised risk assessment procedures to monitor safety and competence levels systematically.

- 4.15 Under the common agricultural policy, increasing support is being given to the development of Integrated Crop Management (ICM) techniques¹³. In this context, new Integrated Pest Management (IPM) methods should also be phased in on a consensual basis. The EESC firmly supports ICM techniques¹⁴, which are a milestone for sustainable farming systems.
- 4.16 It is very difficult to distinguish the various effects of crop protection from the effects of a whole series of other farming practices (rotation etc.): if general IPM "target-standards" are to be drawn up and made mandatory by the Member States before 2014, the EESC feels that users must be given incentives to participate fully in this and that general ICM techniques, technical progress and technological research in the sector – supported and consolidated in the Seventh Community RTD Framework Programme work programmes – must be taken fully into account.
- 4.17 The EESC feels that work programmes and calls for tender under the Seventh RTD Framework Programme 2007-2013 should give due consideration to agricultural and plant protection research into the degrees to which new, advanced technologies are harmless, and into minimising the risk caused by the use of chemicals and mixtures of chemicals.
- 4.18 In its Own-initiative opinion on The future of the CAP¹⁵, the EESC pointed to a number of possible ways of taking better account of environmental aspects in agricultural policy. The "second pillar" of the CAP requires Member States, in the new 2007-2013 Structural Funds programming period and national and regional development plans for rural areas, to provide incentives for mechanisms to compensate farmers who succeed in reducing the risks involved in their use of chemical plant protection products¹⁶.
- 4.19 The definition of IPC techniques must be in line with new provisions on the placing on the market of crop protection products, and standards on IPM techniques must take into account the varying natural and climatic conditions within the EU.
- 4.20 Crop protection products must be handled and stored in such a way as to prevent any potential risk to health or the environment. The EESC believes that, in addition to the proposals, a

13 CEAS *Report on CM Systems in the EU* carried out for DG Environment and the *Codex on Integrated Farming* of the European Initiative on Sustainable development in Agriculture (EISA). The Codex was also recognised by the CEAS report.

14 *Report on CM Systems in the EU*, European Commission, May 2003. Comments from PAN Europé and the EEB, 9/2002.

15 CESE 362/2002, OJ C 125 of 27.5.2002, pp. 87-99.

16 See footnote 13.

framework of minimum standards on storage for wholesalers, retailers and farmers should be defined at Community level¹⁷.

- 4.21 As regards the system of harmonised indicators for the mandatory collection and reporting of statistical information on placing on the market and use of pesticides, the EESC fully agrees that there is a need for statistical information and that it should be mandatory for this data to be collected regularly on the basis of risk and use indicators harmonised at European level.
- 4.22 The EESC stresses the importance of standardising the information to be requested from all stakeholders the need to avoid any duplication or excessive burdens in terms of either red tape or technical complexity.
- 4.23 The indicators should be based on risk rather than on the quantity of products used or of residues present, and on the impact on health. WHO studies could be used here. They should also cover the spread of diseases and pathogens affecting crops.
- 4.24 The EESC calls for due consideration to be given to aspects of international cooperation, as regards both bodies such as the FAO¹⁸ and the OECD¹⁹, and neighbouring regions, particularly the countries of the Mediterranean Basin, the Balkans and bordering countries.

Brussels, 14 March 2007.

The President
of the
European Economic and Social Committee

The Secretary-General
of the
European Economic and Social Committee

Dimitris Dimitriadis

Patrick Venturini

¹⁷ Cf. also *Guidelines for Packaging and Storage of Pesticides* (FAO 1985). Current Community legislation on the storage of chemical substances only lays down standards for large quantities while there are no requirements governing small quantities of pesticides held by individual operators, despite the need for this.

¹⁸ Particularly as regards the monitoring, implementation and updating of the *International code of conduct on the distribution and use of pesticides*. Nov. 2002.

¹⁹ Particularly where the definition of indicators is concerned.