

## OPEN LETTER

### To:

The Members of Standing Committee on Plants, Animals, Food and Feed (PAFF Committee)

The Chair of the PAFF Committee, Head of Unit Pesticides and Biocides, in Directorate-General for Health and Food Safety at the European Commission

### Via e-mail

11 July 2022

## Subject: Call to adopt without delay the Implementing Regulation harmonising the content and format of the pesticide use records

Dear representatives of national governments, members of the PAFF Committee,

Dear Chair of the PAFF Committee,

We are writing on behalf of 58 organisations across Europe in view of the next PAFF Committee meeting on 14-15 July when you will discuss the draft Commission Implementing Regulation under Regulation (EC) No 1107/2009 on “the content and format of the records of the use of plant protection products to be kept by professional users in accordance with Article 67(1) of Regulation (EC) No 1107/2009” (see [Agenda](#), item C.01).

First of all, we would like to state that we welcome the agreement reached on the new regulation on agricultural input and output statistics (SAIO), in particular the obligation to collect and publish data on the use of pesticides on an annual basis.

Evidence of unacceptable harm from extensive pesticide use, whether to biodiversity,<sup>1</sup> or to agricultural workers, is piling up.<sup>2</sup>

**Keeping track of what pesticides are used where when and how is therefore of utmost importance.**

1 Goulson, D. Pesticides linked to bird declines. *Nature* 511, 295–296 (2014). <https://doi.org/10.1038/nature13642>

2 LeMonde, “Agriculteurs intoxiqués”: dans toute l’Europe, les maladies des pesticides abandonnés à leur sort, S. Horel, 17 February 2022



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Beyond the need to analyse trends in the use of pesticides, precise and public data on pesticides use are also indispensable to enabling **more realistic analysis of the exposure** of agriculture workers and residents in rural areas, as well as the exposure of wildlife and ecosystems. Such data are also key to **monitoring water**, notably for drinking water suppliers. They are crucial for many other necessary tasks that are in the public interest. It is, in addition, **a topic of great importance to millions of EU citizens**. The issue of pesticides was indeed the subject matter of the recent European Citizens' Initiative "[Save Bees and Farmers](#)" which gathered approximately 1.2 million signatures across Europe.

That is why, as trade unions, environmental, health and beekeeper organisations including the organisers of the [European Citizens Initiative Save Bees and Farmers](#), as well as the European umbrella organisation for organic food and farming, we have been following closely the negotiations on the new regulation on the Statistics for Agriculture Input and Output (SAIO) with a particular focus on pesticide use data. As explained in multiple open letters and public statements,<sup>3</sup> it was already clear in 1993 that public authorities needed meaningful data on pesticide use to be able to protect people and the environment properly.<sup>4</sup>

On the basis of the outcome of the trilogue, we believe the new SAIO regulation has the potential to lead to much improved pesticide use data.<sup>5</sup> However, according to the text agreed, the **annual** collection of pesticide use data will only start in 2028 and **if an Implementing Regulation harmonising the content and format of the pesticide use records is adopted**. This is a major factor of uncertainty of the SAIO reform that now has to be fixed in the context of the PAFF Committee.

The Commission has prepared an informal draft Implementing Regulation which will be presented on 13-14 July. Furthermore, the Commission has committed to follow a strict timeline. This timeline is laid out in the attached document we obtained following an access to

- 3 E.g. February 2022, [79 organisations voice their concerns on the reform of pesticides statistics | ClientEarth](#) ; May 2022 [Joint statement: Urgent need for precise public data on the use of pesticides across Europe | ClientEarth](#)
- 4 The Fifth Environmental Action Programme defined as a target the "reduction of chemical inputs" in agriculture, specifically setting as an objective "the significant reduction in pesticides use per unit of land under production" by 2000 and foreseeing the "registration of sales and use of pesticides"
- 5 [Evaluation of the outcome of the trilogue held on 2 June on the reform of pesticides statistics | ClientEarth](#)



document request to the Secretariat of the Council (see Annex).

The SAIO reform and its ability to finally deliver robust pesticide use data is now in the hands of the PAFF Committee. **It is the moment for national governments to show to their citizens that they are serious about improving the quality and availability of pesticide use data and protecting the health of people and the environment against pesticides.**

We therefore call on:

1. Each national government represented in the PAFF Committee to **adhere to the Commission's timeline**, i.e. cooperate in good faith to ensure that the draft Implementing Regulation is formally adopted by the end of 2022.
2. The European Commission to adhere to the timeline set out in the attached statement, as well as **publish without delay the latest version of the draft Implementing Regulation** in order to allow civil society to review this draft and participate in a constructive manner to this important decision making process.

Thank you for your consideration.

Yours sincerely,

Alice Bernard

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Chemicals, ClientEarth

Natalija Svrtan

Campaigner, PAN Europe

Helmut Burtscher-Schaden

Campaigner, Friends of the Earth  
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Annexe: Document dated 3 June 2022 "Statement by the Commission on on-going work to ensure availability in electronic format of the records to be kept by professional users of plant protection products pursuant to Article 67(1) of Regulation (EC) No 1107/2009" (ref. 6728/22 add 2)



## List of signatories

	ORGANISATION	GEOGRAPHY	SIGNATORY
1	ADENY	FR	Sylvie Beltrami
2	Agroecology Europe	EU	Elena Ambühl
3	AOGE - Association Organic Gardens for Education	SI	Anamarija Slabe
4	Apimondia	GR	Fani Hatjina
5	ARC2000	EU	Ashley Parsons
6	ÄrztInnen für eine gesunde Umwelt	AT	Hanns Moshammer
7	Aurelia Stiftung	DE	Sarah Thullner
8	Bee Foundation	NL	Sonne Copijn
9	BeeLife	EU	Noa Simón Delso
10	BirdLife Europe and Central Asia	EU	Ariel Brunner
11	CEDEUAM - UniSalento Italy	IT	Michele Carducci
12	ClientEarth	EU	Anaïs Berthier
13	Colibri Foundation	BE	Jeroen Losli
14	Competence Center of Ecodesign	LV	Jana Simanovska
15	Corporate Europe Observatory (CEO)	EU	Nina Holland
16	Dutch Bee Conservation	NL	Maaïke Molenaar
17	Earth Thrive	UK/Serbia	Zoe Lujic
18	Earth Trek	HR	Damir Grgić
19	Eco-Hvar	HR	Vivian Grisogono
20	ECOCITY	GR	Christiana Pirasmaki
21	Ecologistas en Acción	ES	Koldo Hernández
22	EEB	EU	Eva Corral
23	EFFAT	EU	Enrico Somaglia
24	EPBA	DE	Karl-Rainer Koch
25	EURAF	EU	Patrick Worms
26	FODESAM	ES	Carlos de Prada
27	Friends of the Irish Environment	IE	Caroline Lewis
28	GAIA-Environmental Action and Intervention Group	PT	Lanka Horstink
29	Generations Futures	FR	François Veillerette
30	Global 2000	AT	Helmut Burtscher-Schaden
31	GMWatch	UK	Claire Robinson
32	Health and Environment Alliance	EU	Angeliki Lysimachou
33	HEJSupport International	International	Alexandra Caterbow
34	Hogar sin Toxicos	ES	Carlos de Prada
35	IFOAM Organics Europe	EU	Eric Gall
36	Institute Marquès	ES	Marisa López Teijón
37	Integrated Resources Management Co Ltd, (IRMCo)	MT	Anna Spiteri
38	ISDE Italy	IT	Francesco Romizi
39	Justice Pesticides	FR	Arnaud Apoteker
40	Mouvement Ecologique Luxembourg	LU	Roger Dammé
41	NABU – Naturschutzbund Deutschland e.V.	DE	Matti Gureck
42	Nature & Progrès Belgique	BE	Marc Fichers
43	Neo-Agri	FR and ES	Sidney Flament-Ortun
44	NOAH - Friends of the Earth Denmark	DK	June Rebekka Bresson
45	Pesticide Action Network (PAN) Europe	EU	Martin Dermine
46	Pestizid Aktions-Netzwerk e.V. (PAN Germany)	DE	Susanne Smolka
47	Pesticide Action Network Netherlands	NL	Margriet Mantingh
48	Plataforma Transgenicos Fora (Stop GMO Platform Portugal)	PT	Lanka Horstink
49	Polish Ecological Club	PL	Maria Staniszevska
50	Pollinis	FR	Barbara Berardi Tadié
51	Povod Institute	SI	Robert Križanič

52	ROMAPIS	RO	Constantin Dobrescu
53	SumOfUs	International	Eoin Dubsy
54	Umweltinstitut München e.V.	DE	Vera Baumert
55	UNAF	FR	Clémence Rémy
56	WECF International	NL	Johanna Hausmann
57	WeMove Europe	EU	David Schwartz
58	ZERO - Associação Sistema Terrestre Sustentável	PT	Pedro Horta

Bruxelles, le 3 juin 2022  
(OR. fr, en)

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**Dossier interinstitutionnel:  
2021/0020(COD)**

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**6728/22  
ADD 2**

**LIMITE**

**AGRI 68  
AGRIFIN 20  
AGRIORG 21  
AGRISTR 9  
STATIS 10  
CODEC 223  
PESTICIDE 6**

### **DOCUMENT DE TRAVAIL**

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Origine:	Secrétariat général du Conseil
Destinataire:	délégations
N° doc. Cion:	5865/21 + ADD1
Objet:	Proposition de RÈGLEMENT DU PARLEMENT EUROPÉEN ET DU CONSEIL relatif aux statistiques sur les intrants et les produits agricoles et abrogeant les règlements (CE) n° 1165/2008, (CE) n° 543/2009, (CE) n° 1185/2009 et la directive 96/16/CE du Conseil - Déclaration de la Commission

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Les délégations trouveront en annexe une déclaration de la Commission relative à la proposition de règlement SAIO.

**“STATEMENT BY THE COMMISSION ON ON-GOING WORK TO ENSURE AVAILABILITY IN ELECTRONIC FORMAT OF THE RECORDS TO BE KEPT BY PROFESSIONAL USERS OF PLANT PROTECTION PRODUCTS PURSUANT TO ARTICLE 67(1) OF REGULATION (EC) NO 1107/2009**

*The European Green Deal and the Farm to Fork Strategy establish the reduction in the use and risk of chemical pesticides as a key objective for the Union. In order to guarantee effective and impactful policies, robust and comprehensive data on the use of pesticides at farm level is crucial. The on-going work to ensure the availability in electronic format of the records kept by professional users of plant protection products is an important enabling factor to implementing the reporting obligations on pesticides that are part of the proposal for a Regulation of the European Parliament and of the Council on statistics on agricultural input and output (SAIO).*

*Therefore, the Commission has prepared a draft Commission Implementing Regulation, on the basis of Article 67 (4) of Regulation (EC) No 1107/2009 of the European Parliament and of the Council, as regards the content and format of the records of the use of plant protection products to be kept by professional users in accordance with Article 67 (1) of Regulation (EC) No 1107/2009.*

*This Commission Implementing Regulation would, if adopted as currently foreseen, regulate the record-keeping required under Regulation (EC) No 1107/2009 in detail, including by identifying the elements to be recorded by the professional users, and by ensuring that these records will be available in electronic format from 1 January 2025 at the latest.*

*The draft Implementing Regulation is currently under discussion in the Standing Committee on Plants, Animals, Food and Feed, Section Phytopharmaceuticals - Legislation. The Commission intends to seek the opinion of the Committee pursuant to Article 5 of Regulation (EU) No 182/2011 of the European Parliament and of the Council in the coming months.*

*The Commission intends to adopt the Implementing Regulation before the end of 2022.”*