



Dacian Cioloș
Member of the European Commission
Responsible for Agriculture and Rural Development
B-1049 Brussels

Brussels, 13 January 2013

Dear Commissioner Cioloș,

Pesticide Action Network Europe (PAN Europe), Agricultural Rural Convention (ARC 2020), Bee Life European Beekeeping Coordination (Bee Life), Buglife – The Invertebrate Conservation Trust (Buglife) and Association of World Council of Churches related Development Organisations in Europe (APRODEV) are contacting you regarding the interservices consultation on the delegated acts to the CAP reform, in particular the direct payments regulation.

We are aware that 23 Member States* (MS) in November 8th 2013 signed a letter contesting some of the original text proposed by the European Commission in the delegated acts. We understand that one of the points raised in this letter is to permit pesticide use and fertilisers when growing nitrogen fixing crops in Ecological Focus Areas (EFAs).

The argument outlined in the letter that any limitations on pesticide and fertiliser use would make conventional production on EFA impossible ignores that EFA prescriptions can empower farmers and contribute to crop yield and food security, while reducing the need for pesticide and fertiliser inputs. There are well established, simple and scientifically underpinned solutions available that allow conservation and crop production to go hand-in-hand, while also increasing farmers income, and generating positive spin-offs to the regional environment and society as a whole.

This argument is not only greatly disappointing, completely confusing the intended purpose of ecological focus areas, but the argument is also incorrect:

Not only are there many effective non-chemical alternatives for pest and disease control available, but nitrogen fixing crops are an integral part of organic farming systems, showing that these crops are already widely grown without synthetic pesticides and fertilisers.

The main agricultural pollutants are nitrates and pesticides (Shortle and Abler, 1999¹), Several studies show clearly that the way forward for biodiversity is reducing chemical input use. A few examples highlighting the way forward on pesticides giving room to improve biodiversity, including pollinators and insects delivering natural pest control:

¹ Shortle, J.S. and Abler, D.G. (1999) Agriculture and the Environment, in van den Bergh (edited): Handbook of Environmental and Resource Economics (1999). Edward Elgar, Cheltenham, UK

- The link between wild plant and animal species on European farmland and pesticides has been documented by scientists from nine European countries, the study concludes: “*If biodiversity is to be restored in Europe and opportunities are to be created for crop production utilizing biodiversity-based ecosystem services such as biological pest control, there must be a Europe-wide shift towards farming with minimum use of pesticides over large areas.*”(Geiger et al, 2009)²;
- Reduced use of pesticide is a win-win situation as it will permit auxiliary insects to develop and restore a natural equilibrium between detrimental and helpful insects. 84% of the world’s crop diversity relies on insect pollination (Gallai et al, 2009)³.

We are aware that the 23 MS in their letter recall the conclusions of the European Council of 7/8 February 2013, which in their paragraph 67 state that the EFA *requirement ‘will be implemented in a way that do not require the land in question to be taken out of production and that avoid unjustified losses of income to the farmers’*.

However studies show that the argument that EFAs and crop yield are conflicting objectives is incorrect:

A study published Friday last week by Breeze et al⁴ has found that the EU has a severe deficit of pollinators, so much so that future yields risk being affected.

On the other hand, a range of recent research projects⁵ with commercial growers in the UK, the Netherlands and Switzerland has shown that informed and targeted choice of EFA vegetation increases yields in adjacent crops by supporting ecosystem services such as pollination and pest control. The choice of the right non-crop vegetation is essential to generate these services (Olson and Wäckers, 2007⁶; Wäckers and van Rijn⁷, 2012; Campbell et al., 2012⁸). Based on two decades of detailed European studies, successful commercial EFA prescriptions have been developed for low-maintenance flowering field margins that successfully support pollinators and insects delivering natural pest control services.

Finally, in this time of economic crises, it is worth recalling the economic value of the ecosystem services:

A study (Losey et al; 2006⁹) estimated the annual economic value of ecosystem services provided primarily by native insects in the United States at \$4.5 billion per year. Based on projections of crop losses that would occur if these insects were not functioning at their current level plus the cost of using insecticides, natural pest control is estimated to save US\$13.6 billion per year in US

² Geiger et al., Persistent negative effects of pesticides on biodiversity and biological control potential on European farmland, *Basic and Applied Ecology*, 11 (2): 97, 2009

³ Gallai N, Salles J/M, Settele J., Vaissinère B.E. (2009), Economic valuation of the vulnerability of world agriculture confronted with pollinator decline, *ecological economics* 68, 810-821

⁴ Breeze TD, Vaissie`re BE, Bommarco R, Petanidou T, Seraphides N, et al. (2014) Agricultural Policies Exacerbate Honeybee Pollination Service Supply-

Demand Mismatches Across Europe. *PLoS ONE* 9(1): e82996. doi:10.1371/journal.pone.0082996

⁵ www.ecostac.co.uk

⁶ Olson, D., Wäckers, F.L. (2007) Management of field margins to maximize multiple ecological services. *Journal of Applied Ecology* 44:13-21.

⁷ Wäckers, F.L., van Rijn, P.C.J. (2012). Pick and Mix: selecting flowering plants to meet requirements of target biological control insects. In: *Biodiversity and Insect Pests*, G. Gurr (ed) Wiley Blackwell, pp. 139-165.

⁸ Campbell, A.J., Biesmeijer, J.C., Varma, V., Wäckers, F.L. (2012) Realizing multiple ecosystem services based on the response of three beneficial insect groups to floral traits and trait diversity. *Basic and Applied Ecology* 13:363-370.

⁹ Losey, J. E., and M. Vaughan. 2006. The economic value of ecological services provided by insects. *BioScience* 56: 311–323.

farming. We have the choice between supporting pollination and natural pest control through the informed use of EFAs, or seriously undermining these vital services by allowing the use of pesticides on EFAs

PAN Europe, ARC2020 APRODEV, Bee Life and Buglife therefore encourage the European Commission to stand strong on allowing no chemical pesticides and fertilizer in EFAs. The 23 Member States in their letter actually did accept the wording of recital 44 of the direct payment highlighting that *‘The ecological focus area should therefore consist of areas directly affecting biodiversity such as land lying fallow, landscape features, terraces, buffer strips, afforested areas and agro-forestry areas, or indirectly affecting **biodiversity through a reduced use of inputs on the farm**, such as areas covered by catch crops and winter green cover ».*

What needs to be done for a European model of farming is not integrating more conventional farming into ecological areas, but instead integrating and mainstreaming more ecological principals into conventional farming, this is why there is a need to stand strong on this matter.

While we fully recognise the European Commission’s special effort taken in this CAP reform to increase EU production of nitrogen fixing crops, as highlighted by many, included the 254 participants of the 12th Congress of the European Society for Agronomy (August 2012)¹⁰, we do believe that this has to be done by increasing the conventional production of nitrogen fixing crops **in the fields**, as part of a crop rotation, rather than pushing this in the EFAs, using other policy tools (like coupled payments, the European Innovation Partnership on agricultural productivity and sustainability, together with the elaboration of an EU communication on protein crops, as has been planned for a long time already.

Sincerely yours



François Veillerette
President of PAN Europe



Samuel Féret
Coordinator ARC 2020



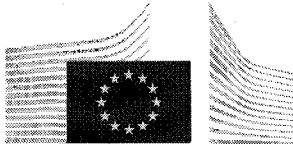
Matt Shardlow
CEO of Buglife



Francesco Panella
President of Bee Life

Copy:

Mr Borg, member of the European Commission resp for health
Mr Potočnik, Member of the European Commission resp for environment
Ms Hedegaard, Member of the European Commission resp for climate action
Mr Plewa, Director General for DG Agriculture and Rural Development
Mrs Testori Coggi, Director General for DG for Health and Consumers
Mr Falkenberg, Director General for DG Environment
Mr Delbeke, Director General for DG Climate Action



EUROPEAN COMMISSION

Cabinet of Commissioner Dacian Cioloş
Head of Cabinet

Brussels, 23. 05. 2014
GH/YM/vt (2014) 860282

Dear Sirs,

In your letter of 13th January 2014, which received our fullest attention, you requested clarification and assurances regarding the use of pesticides and fertiliser on nitrogen fixing crops in Ecological Focus Areas (EFA) and other related concerns.

As stated in recital 44 of Regulation (EU) No 1307/2013, the Ecological Focus Areas should be established, in particular, to safeguard and improve biodiversity on farms. It is recognised that the reduced use of inputs contribute to the enhancement of biodiversity, as recalled in the same recital and which you highlighted in your letter.

Keeping in mind the overall need of improving biodiversity, in this Regulation and in the Delegated Regulation on direct payments adopted by the Commission on this 11 March, requirements to limit the use of plant protection products and fertilizers can be specified in relation to the different types of EFA.

In particular, on areas with short rotation coppice, it is not possible to use mineral fertilizers and/or plant protection products and Member States shall establish the relevant requirements for the sake of safeguarding and improving biodiversity.

On areas under catch crops or green cover Member States shall set up a list of mixtures of crop species, to be used to increase the effectiveness of this EFA for biodiversity, define the period for the sowing, and may establish additional conditions notably with regard to production methods, which could lead to possible specific requirements concerning the ban of pesticides. In any event, for this type of EFA the interest for the farmer to use pesticides is very limited; the crops concerned are in place for a short period and agricultural production is not the primary objective.

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Copy: Mrs Henriette Christensen (PAN Europe) henriette@pan-europe.info

For areas with nitrogen fixing crops Member States shall define a list of crops under the objective of improving biodiversity. This requirement will allow Member States to choose on this type of EFA crops avoiding intensive use of pesticides and fertilisers. In addition, Member States may establish additional conditions, notably with regard to production methods, thus getting the possibility to further regulate the use of inputs, e.g. through a ban.

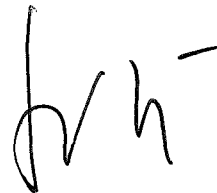
Other types of EFA like land lying fallow, landscape features and buffer strips are elements without agricultural production, therefore the risk of using fertilizers and plant production products is limited. As you raised concerns on the need of supporting ecosystem services as pollination and pest control, the role of these environmental services will be enhanced, especially by some landscape features such as hedges and wooded strips, field margins, trees, riparian vegetation around ponds. For this respect, some landscape elements get a higher value for weighting factors fixed in Annex II of the Delegated Regulation.

The whole set of these requirements, specific for each type of EFA, will be useful to strike an overall balance between the limitation in the use of agricultural inputs and the possibility to have production on some EFA, the latter already introduced with the political agreement on the basic regulation. A general ban of pesticides on EFA as you requested in your letter would have implied an increased complexity for control (e.g. soil or plant sampling) and a potential source of error risk.

As you also stressed the importance of the “informed use of EFA”, be aware that in the overall Common Agricultural Policy for the next period the attention to environmental issues is supported by concrete information and advice actions targeted to different actors.

In particular, these instruments are represented by the Farm Advisory System as set out in Article 12 of Regulation (EU) No 1306/2013, which comprises specific provisions for greening in its subparagraph 2(b). In the context of Rural Development, priority 1 on “fostering knowledge transfer” can even cover actions on the management of greening obligations, e.g. in Article 15 of Regulation (EU) No 1305/2013 on Advisory services, advice on greening is specifically foreseen in subparagraph 4(b). Moreover, the Rural Development measure on cooperation is aimed at associating different actors (farmers, forest managers etc.) to undertake common environmental initiatives (Article 35 of Regulation (EU) No 1305/2013).

Yours sincerely,

A handwritten signature in black ink, appearing to be 'GH' with a horizontal line extending from the top right of the 'H'.

Georg Häusler