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Evaluación de la Directiva sobre el uso sostenible de los plaguicidas

DOCUMENTO INFORMATIVO

Sección de Agricultura, Desarrollo Rural y Medio Ambiente

Evaluación de la Directiva sobre el uso sostenible de los plaguicidas
(Documento informativo)

Ponente: **José Manuel ROCHE RAMO**

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Fundamento jurídico	Artículo 34 del Reglamento interno
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1. **Introducción**

- 1.1 La Directiva sobre el uso sostenible de los plaguicidas en lo sucesivo, la DUSP —objeto del presente Documento informativo— fue aprobada en 2009 con el objetivo de reducir el riesgo y los efectos del uso de plaguicidas en la salud humana y el medio ambiente. La gestión integrada de plagas, similar a otras prácticas de gestión de plagas con bajos insumos de plaguicidas, al igual que la agricultura ecológica, constituye uno de los elementos clave de la Directiva en la medida en que incluye acciones como la rotación de cultivos, la vigilancia de plagas y la aplicación de métodos no químicos de control de plagas y otros plaguicidas de menor riesgo.
- 1.2 Teniendo en cuenta los elementos enumerados anteriormente, el CESE **estima oportuno llevar a cabo una revisión de la hoja de ruta** de la actual DUSP que incluya una evaluación de impacto y consulta a las partes interesadas.
- 1.3 Particularmente, consideramos del todo necesario reevaluar los requisitos, objetivos, condiciones y plazos establecidos en el marco de los planes de acción nacionales con el objetivo último de reducir los riesgos y efectos derivados del uso de plaguicidas, tanto para la salud humana y animal como para el buen estado y conservación de los ecosistemas.
- 1.4 La evaluación que el CESE presenta a través de este documento informativo se basa fundamentalmente en las percepciones y opiniones de organizaciones de la sociedad civil recogidas durante las misiones de investigación en una serie de Estados miembros de la UE (Bulgaria, Croacia, España, Irlanda y Suecia), así como de las respuestas obtenidas a partir del cuestionario en línea elaborado al efecto. En particular, se invitó a las partes interesadas a presentar sus puntos de vista sobre la eficacia y la pertinencia de la legislación de la UE relativa al uso de plaguicidas, así como sobre su nivel de inclusión en la elaboración y aplicación de la legislación.

2. **Conclusiones y recomendaciones**

2.1 **Eficacia**

- 2.1.1 A pesar de que los Estados miembros iniciaron la transposición y aplicación de la DUSP desde puntos de partida diferentes y de que los avances logrados por los Estados miembros difieren, la aplicación de dicha Directiva y del PNA ha demostrado ser, en términos generales, eficaz a la hora de lograr un uso más racional y sostenible, así como en la reducción del riesgo derivado de la utilización de productos fitosanitarios.
- 2.1.2 La DUSP ha contribuido a sensibilizar y concienciar a todos los agentes de la cadena directamente implicados (industria, distribución y agricultores) sobre la importancia del manejo integrado de plagas (en lo sucesivo, MIP) y el mejor uso de los productos fitosanitarios. Otra de las mejoras observadas desde la puesta en marcha del uso sostenible de los plaguicidas ha sido la de aumentar —a través de la introducción de los planes nacionales— la concienciación en los usuarios finales sobre la importancia de hacer un uso más eficiente y racional de los plaguicidas para proteger no solo al medio ambiente sino a ellos mismos.

- 2.1.3 Si bien desde su puesta en marcha se han constatado avances significativos en el manejo y tratamiento de plaguicidas (cabe citar en este sentido la expedición de certificados obligatorios para su manipulación en algunos Estados miembros), la falta de conocimientos adecuados sigue siendo el principal obstáculo relacionado con el uso óptimo de plaguicidas. Concretamente, y aunque con excepciones en determinados países, se continúa observando un incumplimiento general de la exigencia de formación obligatoria de los usuarios finales.
- 2.1.4 Existe a la vez un amplio consenso sobre la ausencia de soluciones alternativas y nuevas tecnologías lo suficientemente rentables como para lograr desincentivar de manera más decisiva el uso de productos fitosanitarios. Se sigue recurriendo poco a soluciones alternativas, debido principalmente a una falta de eficacia y rentabilidad para el mantenimiento óptimo de los cultivos.
- 2.1.5 Además, la escasez de soluciones alternativas disponibles en la actualidad implica en la mayoría de los casos unos costes muy elevados difíciles de asumir por los agricultores, quienes frecuentemente comercializan sus productos por debajo de los costes de producción. Por otro lado, la eliminación del mercado de sustancias activas no se está produciendo al mismo ritmo que el desarrollo de soluciones alternativas, lo cual coloca a los agricultores en una situación de desventaja competitiva en la producción de sus productos agrícolas.
- 2.1.6 En cuanto a otros factores que influyen en la decisión de los agricultores de utilizar o no plaguicidas, cabe señalar presiones de naturaleza política, medioambiental, social y económica. Este último es sin duda el factor que más influye y condiciona el uso que hacen los agricultores de los productos fitosanitarios. A modo de ejemplo, el 81 % de las respuestas obtenidas a través de la encuesta realizada por el CESE apunta a la presión financiera como la principal causa que motiva a los agricultores a utilizar plaguicidas. Concretamente, la falta de una rentabilidad mínima para sus productos, sumada a los altos costes productivos, impulsa de forma significativa a los agricultores a utilizar más productos fitosanitarios.
- 2.1.7 Además de la presión económica, otros factores que influyen en la elección de los agricultores de productos fitosanitarios están relacionados con las condiciones agroecológicas específicas de cada país, los hábitos de compra y el comportamiento de los consumidores, así como los factores sociodemográficos.
- 2.1.8 Asimismo, se constata la falta de un sistema de seguimiento lo bastante eficiente como para conocer si la normativa de la UE ha promovido una mayor aplicación de los sistemas de MIP. El seguimiento y la vigilancia del cumplimiento de la ley se consideran de igual manera una deficiencia de la DUSP, así como la ausencia de sanciones efectivas para quienes incumplan el Reglamento. Además, se detecta la necesidad de contar con un mejor sistema en el registro de datos con indicadores desglosados por sector, tanto a escala nacional como de la UE, sobre la cantidad de productos fitosanitarios utilizados.
- 2.1.9 Por otra parte, desde un punto de vista social y laboral, algunos Estados miembros han detectado ocasionalmente ciertas malas praxis profesionales de algunos usuarios de plaguicidas que incumplen de hecho los procedimientos relativos a la seguridad que han sido notificados a las autoridades pertinentes.

2.2 Relevancia

- 2.2.1 El nuevo modelo de gobernanza de la UE exige un grado cada vez mayor de coordinación y cooperación entre las distintas políticas públicas existentes. En este sentido, algunas de las nuevas políticas surgidas bajo el paraguas del nuevo Pacto Verde tendrán unas consecuencias importantes en políticas que afectan no solo a la propia DUSP sino a políticas de alcance más global como la política agrícola común (PAC).
- 2.2.2 En la misma línea, de los resultados extraídos a través de las encuestas y las misiones efectuadas para la elaboración de este informe existe un consenso generalizado acerca de la importancia que tiene la PAC y su capacidad para generar sinergias con otras políticas y acciones relacionadas con los objetivos de sostenibilidad. A la vez que se acepta de forma generalizada la posibilidad de abundar en la exploración de nuevas vías y formas de conexión entre las distintas políticas para reforzar la ambición medioambiental, de las informaciones obtenidas se desprende igualmente la necesidad de que dichas acciones no pongan en riesgo ni comprometan los fondos y recursos asignados para cumplir con las metas y objetivos establecidos en el ámbito de la PAC.
- 2.2.3 De igual forma, en la medida en que contienen acciones con efectos directos sobre la regulación de la DUSP, se considera que las medidas introducidas en el marco del nuevo Pacto Verde Europeo y las Estrategias sobre «Biodiversidad 2030» y «De la granja a la mesa» deben de ser evaluadas en profundidad para prevenir cualquier impacto negativo en la renta de los agricultores. En este sentido, de las informaciones extraídas, existe una visión compartida sobre la necesidad de llevar a cabo evaluaciones de impacto sectorializadas que cuantifiquen los efectos derivados de la aplicación de los nuevos objetivos en relación con la reducción de productos fitosanitarios, en el contexto de la Estrategia «de la granja a la mesa».
- 2.2.4 Por otro lado, la puesta en marcha de nuevas medidas o acciones en el contexto de la revisión de la actual DUSP debe tener en consideración los objetivos, principios y naturaleza de la PAC (artículo 39 del TFUE) de manera que no se pongan en riesgo ni se comprometan los recursos destinados a hacer frente a la baja rentabilidad que sufren los agricultores. Asimismo, el conjunto de acciones y políticas integradas en el Pacto Verde debe tener en cuenta la sostenibilidad bien entendida en su triple dimensión: ambiental, social y económica.
- 2.2.5 Existe igualmente una preocupación manifiesta en cuanto a la política de importación de alimentos procedentes de terceros países que han sido tratados con productos fitosanitarios no autorizados en el mercado único europeo. Por tanto, es fundamental que la UE ponga en práctica la normativa vigente aplicando el principio de reciprocidad a los productos agroalimentarios de terceros países. Asimismo, se deben reforzar los controles y estrechar la vigilancia para evitar la entrada en la UE de plaguicidas cuyo uso no está permitido de acuerdo con la legislación europea. Ambas cuestiones deberán tenerse especialmente en cuenta ya que impiden a los agricultores europeos competir en igualdad de condiciones, especialmente en cuanto a costes y precios se refiere, así como por sus efectos negativos en cuestiones relacionadas con la seguridad alimentaria, el fraude y la información a los consumidores. En este contexto, es importante defender la importancia y seguir apostando por el modelo de

agricultura europea sostenible sin que la competitividad de los agricultores quede mermada. Como dato destacable a este respecto, un 68 % de los encuestados considera que, ante la disyuntiva rentabilidad versus sostenibilidad, esta tensión redundará en una pérdida significativa de la competitividad de los agricultores.

2.3 Información sobre plaguicidas y participación de la sociedad civil

- 2.3.1 Existe una opinión generalizada sobre la ausencia de participación efectiva por parte de la sociedad civil organizada en el diseño, aplicación, seguimiento y evaluación de la SUD. A pesar de que existen algunos ejemplos de participación activa en alguno de los países analizados en el muestreo, el impacto real y la capacidad de influencia siguen siendo muy reducidos a nivel global. Si bien es necesario insistir en que esta ha sido la tendencia mayoritaria, merece la pena destacar realidades distintas como la de Suecia en donde se ha documentado un elevado grado de participación en el diseño y evaluación de las políticas públicas, sobre todo gracias al alto porcentaje de participación de la sociedad civil en los procesos de consulta pública abiertos al efecto.
- 2.3.2 Por tanto, se constata una capacidad de influencia más bien limitada en la toma de decisiones en el ámbito objeto de la evaluación, lo cual se explica en particular por la complejidad y el carácter excesivamente técnico de la materia. Esta impresión viene avalada por un 86 % de los encuestados, quienes creen que la ciudadanía europea y la sociedad civil carecen de información suficiente sobre las normas y la gestión en el uso de plaguicidas
- 2.3.3 La mayor parte de la información recopilada apunta a que la dificultad técnica implícita, así como el alto grado de experiencia requerido, actúan como barrera a la hora de permitir un mayor grado de penetración de las organizaciones involucradas en el diseño de las políticas relativas a los plaguicidas. Esto explica a su vez por qué una amplia mayoría opina que el debate está frecuentemente afectado por presiones ideológicas y que la comunidad científica y académica debería desempeñar un papel mucho más importante en labores de divulgación, comunicación e información relativas al uso de plaguicidas.
- 2.3.4 Al mismo tiempo, determinadas pruebas apuntan a la existencia de un importante interés en cuestiones relacionadas con el uso de plaguicidas por parte de organizaciones de la sociedad organizadas, así como en general del público no especializado.
- 2.3.5 Además, esta temática ha logrado captar una gran atención mediática en los últimos tiempos. Esto último se evidencia especialmente en el alto grado de interés suscitado por todas aquellas cuestiones directamente relacionadas con la seguridad alimentaria y los precios al consumidor por sus interacciones con las políticas sobre productos fitosanitarios.

2.3.6 En general, y pese a las divergencias existentes entre los distintos países, se percibe no obstante un desconocimiento significativo entre la ciudadanía y, concretamente, entre las y los consumidores sobre la función y el uso de los plaguicidas con arreglo tanto a la legislación nacional como europea. Por este motivo, algunas de las recomendaciones propuestas incluyen la puesta en marcha de campañas de sensibilización y difusión para informar mejor al público en general y a los responsables políticos. Debe difundirse, por ejemplo, información sobre los factores que intervienen en la fijación de los precios de los alimentos y sobre cuestiones más estrechamente relacionadas con el etiquetado o la certificación de los productos.

2.4 Perspectivas

2.4.1 La agricultura de la UE tiene por delante un panorama marcado por la aparición de nuevos retos y obstáculos, aunque también por nuevas oportunidades. Cuestiones como la sostenibilidad y la competitividad del sistema alimentario, la dificultad de los agricultores para cubrir sus costes de producción, los efectos y la acción en materia de cambio climático, el envejecimiento de la población, la falta de relevo generacional, la despoblación de las zonas rurales, la agricultura de precisión y la digitalización marcarán sin duda el futuro de la agricultura y la forma de producir y consumir alimentos

2.4.2 Un reto especialmente relevante tiene que ver con conseguir alcanzar un equilibrio entre la rentabilidad necesaria para lograr mantener la productividad agrícola y la vida en el medio rural y la protección del medio ambiente, dedicando atención especial a la política comercial de la UE con terceros países al objeto de evitar que la firma de acuerdos comerciales ponga en jaque el modelo europeo de agricultura familiar y, de esta forma, garantizar el modelo agroalimentario europeo, que continúa siendo líder en materia de estándares de seguridad y calidad alimentaria.

3. Recomendaciones del CESE

3.1 Eficacia

3.1.1 Es fundamental que en este nuevo modelo de gobernanza «no se deje a nadie atrás»: esto pasa por asegurar que todos los Estados miembros puedan lograr aplicar de forma óptima la DUSP a pesar de partir de realidades distintas.

3.1.2 Un elemento clave tiene que ver con la formación en materia de productos fitosanitarios y el aumento del nivel de conocimientos. Para ello será necesario:

- disponer de un sistema de formación más completo y asequible en beneficio no solo de los agricultores sino también de las y los trabajadores del campo, así como de los propios agentes evaluadores, quienes deben asegurarse un nivel de actualización regular debido a la complejidad de la temática en cuestión;
- hacer real y efectiva la obligatoriedad de formación para el uso y la compra de plaguicidas en todos los Estados miembros;
- incrementar la financiación privada y pública para la formación y apoyar la colaboración entre ambos sectores, especialmente en cuestiones relacionadas con la investigación e innovación de productos fitosanitarios, y

- reforzar el papel de los servicios de asesoramiento en la promoción de las mejores prácticas fitosanitarias. A modo de ejemplo, en España ha aumentado de 230 000 a 304 000 el número de explotaciones que están siendo asesoradas en sistemas de producción integrada en los últimos siete años, pasando de dos millones y medio a trece millones de hectáreas.
- 3.1.3 Mejorar la disponibilidad y rentabilidad de soluciones alternativas y de nuevas tecnologías para el uso de productos fitosanitarios:
- incrementar la compensación financiera para los agricultores con el fin de integrar gradualmente soluciones alternativas en las prácticas agrícolas;
 - aumentar los fondos destinados a la investigación e innovación para el desarrollo de soluciones alternativas eficientes y asequibles a fin de que los agricultores sigan siendo competitivos, y
 - promover la inclusión de las nuevas tecnologías y la innovación, como por ejemplo el uso de drones, en el ámbito de aplicación de la DUSP.
- 3.1.4 Tener en consideración las diferentes influencias y presiones a las que se enfrentan los agricultores:
- presiones económicas y financieras;
 - condiciones agroecológicas nacionales;
 - comportamiento y opciones de los consumidores, y
 - factores sociodemográficos.
- 3.1.5 Mejorar el sistema de seguimiento y garantizar el cumplimiento de la DUSP y el Plan Nacional de Acción:
- mejorar el seguimiento de los avances a escala nacional y de la UE;
 - desarrollar una base de datos a escala de la UE no solo sobre las ventas, sino también sobre el uso de las diferentes categorías de plaguicidas y su tasa de aplicación;
 - hacer efectivas las sanciones para los Estados miembros que no respeten las normas, y
 - otras medidas para asegurar que los plaguicidas solo pueden ser utilizados por las personas adecuadas.
- 3.1.6 Lograr mejoras en las prácticas relacionadas con la salud y la seguridad de los usuarios de productos fitosanitarios:
- proporcionar equipos de protección a todos los agricultores y promover el uso de equipos adecuados de higiene y protección individual en la manipulación de plaguicidas, y
 - promover la sensibilización, la formación y la evaluación del impacto de los riesgos de los plaguicidas para la salud.

3.2 **Relevancia**

- 3.2.1 Hacer que la PAC siga siendo una de las políticas centrales de la UE que permita mantener un modelo agrícola y ganadero europeo sostenible que, basado en un modelo de agricultura profesional, familiar y cooperativista, permita a los agricultores mantener actividades económicamente viables al tiempo que suministran a la UE alimentos seguros, sanos, de buena calidad y a precios asequibles.
- 3.2.2 Conseguir avanzar hacia una mejor armonización y coherencia entre las distintas políticas y la legislación de la UE: PAC, DUSP, Estrategia sobre Biodiversidad, Pacto Verde, «De la granja a la mesa», etc.
- 3.2.3 Llevar a cabo evaluaciones de impacto en relación con los posibles efectos derivados de los objetivos de reducción fijados actualmente en el Pacto Verde y la Estrategia «De la granja a la mesa», siempre a partir de la ciencia y evitando circunscribir el debate a la esfera de posicionamientos de carácter ideológico.
- 3.2.4 Promover una política comercial y de la competencia leal en el mercado común de la UE que vigile en especial los potenciales efectos negativos de las importaciones procedentes de terceros países. Esto pasa por un refuerzo de los controles y el seguimiento de las importaciones de terceros países y por una mayor armonización europea en materia aduanera.

3.3 **Información sobre plaguicidas y participación de la sociedad civil**

- 3.3.1 La aplicación de la nueva Directiva debería dar un mayor peso a la inversión en formación e información a los usuarios de plaguicidas.
- 3.3.2 La sociedad civil organizada, y en especial aquellas organizaciones expertas en el ámbito de los plaguicidas, deben ser involucradas en mayor medida en el diseño, seguimiento y futura evaluación de la nueva Directiva.
- 3.3.3 Hay que mejorar el grado de información de la ciudadanía en general y, especialmente, de las y los consumidores sobre la función de los plaguicidas.

3.4 **Perspectivas**

3.4.1 El panorama que se dibuja a medio y largo plazo en relación con las políticas alimentarias, la agricultura o la seguridad alimentaria está caracterizado por la aparición de nuevos retos y amenazas si bien también de nuevas oportunidades. Por este motivo, la UE debe poder lograr la adopción de un enfoque holístico de la función de los plaguicidas que integre de forma equilibrada a todo el sistema agroalimentario y a los consumidores con el objetivo último de seguir logrando abastecer de alimentos sanos y seguros a una población mundial en constante crecimiento.

Bruselas, 15 de abril de 2021

Peter SCHMIDT

Presidente de la Sección de Agricultura, Desarrollo Rural y Medio Ambiente

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Nota: sigue anexo.

EVALUATION OF THE DIRECTIVE ON THE SUSTAINABLE USE OF PESTICIDES (2009/128/EC)

Technical annex

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2.1.4 Existe a la vez un amplio consenso sobre la ausencia de soluciones alternativas y nuevas tecnologías lo suficientemente rentables como para lograr desincentivar de manera más decisiva el uso de productos fitosanitarios. Se sigue recurriendo poco a soluciones alternativas, debido principalmente a una falta de eficacia y rentabilidad para el mantenimiento óptimo de los cultivos. 4

2.1.5 Además, la escasez de soluciones alternativas disponibles en la actualidad implica en la mayoría de los casos unos costes muy elevados difíciles de asumir por los agricultores, quienes frecuentemente comercializan sus productos por debajo de los costes de producción. Por otro lado, la eliminación del mercado de sustancias activas no se está produciendo al mismo ritmo que el desarrollo de soluciones alternativas, lo cual coloca a los agricultores en una situación de desventaja competitiva en la producción de sus productos agrícolas. 4

2.1.6 En cuanto a otros factores que influyen en la decisión de los agricultores de utilizar o no plaguicidas, cabe señalar presiones de naturaleza política, medioambiental, social y económica. Este último es sin duda el factor que más influye y condiciona el uso que hacen los agricultores de los productos fitosanitarios. A modo de ejemplo, el 81 % de las respuestas obtenidas a través de la encuesta realizada por el CESE apunta a la presión financiera como la principal causa que motiva a los agricultores a utilizar plaguicidas. Concretamente, la falta de una rentabilidad mínima para sus productos, sumada a los altos costes productivos, impulsa de forma significativa a los agricultores a utilizar más productos fitosanitarios. 4

2.1.7 Además de la presión económica, otros factores que influyen en la elección de los agricultores de productos fitosanitarios están relacionados con las condiciones agroecológicas específicas de cada país, los hábitos de compra y el comportamiento de los consumidores, así como los factores sociodemográficos. 4

2.1.8 Asimismo, se constata la falta de un sistema de seguimiento lo bastante eficiente como para conocer si la normativa de la UE ha promovido una mayor aplicación de los sistemas de MIP. El seguimiento y la vigilancia del cumplimiento de la ley se consideran de igual manera una deficiencia de la DUSP, así como la ausencia de sanciones efectivas para quienes incumplan el Reglamento. Además, se detecta la necesidad de contar con un mejor sistema en el registro de datos con indicadores desglosados por sector, tanto a escala nacional como de la UE, sobre la cantidad de productos fitosanitarios utilizados. 4

2.1.9 Por otra parte, desde un punto de vista social y laboral, algunos Estados miembros han detectado ocasionalmente ciertas malas praxis profesionales de algunos usuarios de plaguicidas que incumplen de hecho los procedimientos relativos a la seguridad que han sido notificados a las autoridades pertinentes. 4

2.2 Relevancia	5
2.2.1 El nuevo modelo de gobernanza de la UE exige un grado cada vez mayor de coordinación y cooperación entre las distintas políticas públicas existentes. En este sentido, algunas de las nuevas políticas surgidas bajo el paraguas del nuevo Pacto Verde tendrán unas consecuencias importantes en políticas que afectan no solo a la propia DUSP sino a políticas de alcance más global como la política agrícola común (PAC).	5
2.2.2 En la misma línea, de los resultados extraídos a través de las encuestas y las misiones efectuadas para la elaboración de este informe existe un consenso generalizado acerca de la importancia que tiene la PAC y su capacidad para generar sinergias con otras políticas y acciones relacionadas con los objetivos de sostenibilidad. A la vez que se acepta de forma generalizada la posibilidad de abundar en la exploración de nuevas vías y formas de conexión entre las distintas políticas para reforzar la ambición medioambiental, de las informaciones obtenidas se desprende igualmente la necesidad de que dichas acciones no pongan en riesgo ni comprometan los fondos y recursos asignados para cumplir con las metas y objetivos establecidos en el ámbito de la PAC. .	5
2.2.3 De igual forma, en la medida en que contienen acciones con efectos directos sobre la regulación de la DUSP, se considera que las medidas introducidas en el marco del nuevo Pacto Verde Europeo y las Estrategias sobre «Biodiversidad 2030» y «De la granja a la mesa» deben de ser evaluadas en profundidad para prevenir cualquier impacto negativo en la renta de los agricultores. En este sentido, de las informaciones extraídas, existe una visión compartida sobre la necesidad de llevar a cabo evaluaciones de impacto sectorializadas que cuantifiquen los efectos derivados de la aplicación de los nuevos objetivos en relación con la reducción de productos fitosanitarios, en el contexto de la Estrategia «de la granja a la mesa».	5
2.2.4 Por otro lado, la puesta en marcha de nuevas medidas o acciones en el contexto de la revisión de la actual DUSP debe tener en consideración los objetivos, principios y naturaleza de la PAC (artículo 39 del TFUE) de manera que no se pongan en riesgo ni se comprometan los recursos destinados a hacer frente a la baja rentabilidad que sufren los agricultores. Asimismo, el conjunto de acciones y políticas integradas en el Pacto Verde debe tener en cuenta la sostenibilidad bien entendida en su triple dimensión: ambiental, social y económica.	5
2.2.5 Existe igualmente una preocupación manifiesta en cuanto a la política de importación de alimentos procedentes de terceros países que han sido tratados con productos fitosanitarios no autorizados en el mercado único europeo. Por tanto, es fundamental que la UE ponga en práctica la normativa vigente aplicando el principio de reciprocidad a los productos agroalimentarios de terceros países. Asimismo, se deben reforzar los controles y estrechar la vigilancia para evitar la entrada en la UE de plaguicidas cuyo uso no está permitido de acuerdo con la legislación europea. Ambas cuestiones deberán tenerse especialmente en cuenta ya que impiden a los agricultores europeos competir en igualdad de condiciones, especialmente en cuanto a costes y precios se refiere, así como por sus efectos negativos en cuestiones relacionadas con la seguridad alimentaria, el fraude y la información a los consumidores. En este contexto, es importante defender la importancia y seguir apostando por el modelo de agricultura europea sostenible sin que la competitividad de los agricultores quede mermada. Como dato destacable a este respecto, un 68 % de los encuestados considera que, ante la disyuntiva rentabilidad versus sostenibilidad, esta tensión redundará en una pérdida significativa de la competitividad de los agricultores.....	5
2.3 Información sobre plaguicidas y participación de la sociedad civil	6

2.3.1	Existe una opinión generalizada sobre la ausencia de participación efectiva por parte de la sociedad civil organizada en el diseño, aplicación, seguimiento y evaluación de la SUD. A pesar de que existen algunos ejemplos de participación activa en alguno de los países analizados en el muestreo, el impacto real y la capacidad de influencia siguen siendo muy reducidos a nivel global. Si bien es necesario insistir en que esta ha sido la tendencia mayoritaria, merece la pena destacar realidades distintas como la de Suecia en donde se ha documentado un elevado grado de participación en el diseño y evaluación de las políticas públicas, sobre todo gracias al alto porcentaje de participación de la sociedad civil en los procesos de consulta pública abiertos al efecto. 6	6
2.3.2	Por tanto, se constata una capacidad de influencia más bien limitada en la toma de decisiones en el ámbito objeto de la evaluación, lo cual se explica en particular por la complejidad y el carácter excesivamente técnico de la materia. Esta impresión viene avalada por un 86 % de los encuestados, quienes creen que la ciudadanía europea y la sociedad civil carecen de información suficiente sobre las normas y la gestión en el uso de plaguicidas 6	6
2.3.3	La mayor parte de la información recopilada apunta a que la dificultad técnica implícita, así como el alto grado de experiencia requerido, actúan como barrera a la hora de permitir un mayor grado de penetración de las organizaciones involucradas en el diseño de las políticas relativas a los plaguicidas. Esto explica a su vez por qué una amplia mayoría opina que el debate está frecuentemente afectado por presiones ideológicas y que la comunidad científica y académica debería desempeñar un papel mucho más importante en labores de divulgación, comunicación e información relativas al uso de plaguicidas. 6	6
2.3.4	Al mismo tiempo, determinadas pruebas apuntan a la existencia de un importante interés en cuestiones relacionadas con el uso de plaguicidas por parte de organizaciones de la sociedad organizadas, así como en general del público no especializado. 6	6
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0. Introduction

The EESC has written this information report assessing [Directive 2009/128/EC](#) of the European Parliament and of the Council of 21 October 2009 establishing a **framework for Community action to achieve the sustainable use of pesticides**.

Based on information collected during fact-finding meetings to selected EU Member States and responses to an expert questionnaire, this technical annex **gathers, analyses and summarises the views of civil society organisations on the Directive**. In particular, stakeholders were invited to present their views on the *effectiveness* and *relevance* of EU legislation¹ regarding the use of pesticides, as well as the added value of civil society, i.e. the *level of inclusion* of civil society organisations in drafting and implementing the legislation.

The report aims to **inform policymakers in view of the new proposal for the revision of the Directive** and will thus be shared with the European Commission and other relevant stakeholders.

1. Data collection

The members of the EESC study group collected the views of civil society organisations through two channels: an expert questionnaire and five virtual fact-finding meetings.

- The **questionnaire** was created on the EU Survey online portal, using a combination of question formats (filter questions, closed and open-ended questions, a grid and the most significant change method). The questionnaire consultation was open from 21 January 2021 to 21 February 2021.
- The virtual **fact-finding meetings** included semi-structured interviews with local civil society organisations and representatives of public authorities (and other stakeholders in some cases), generally following the structure of the questionnaire.

Secondary data collection drew on the EESC's past work on the subject, such as EESC opinions, conference reports, meetings and public hearings.

2. Sampling

2.1 Fact-finding meetings

¹

The European Commission designed the evaluation criteria: https://ec.europa.eu/info/sites/info/files/file_import/better-regulation-toolbox-47_en_0.pdf

Member States were selected for fact-finding meetings by the study group based on criteria adopted by the **EESC Bureau on 22 January 2019**. The European Commission was also consulted.

The countries were selected based on:

- *political spread* e.g. high/low level of implementation, application success rates, most/least affected by the legislative proposal/programme, etc.;
- *geographical spread* i.e. by setting up five groups of Member States and choosing one from each group.

The EU Member States selected for this information report were the following: **Spain (20 January 2021), Bulgaria (21 January 2021), Sweden (22 January 2021), Ireland (25 January 2021) and Croatia (29 January 2021)**.

2.2 Questionnaire

The aim of the questionnaire was to complement the information obtained from the fact-finding meetings. Composed of **23 questions**, the questionnaire was sent to organisations in the Member States selected for the fact-finding meetings (not only to those participating in the mission meetings, but also to other relevant organisations).

2.3 Breakdown of respondents

During the five fact-finding meetings, the EESC delegations consulted **48 civil society organisations and representatives of public authorities**.

In addition, **206 responses were collected through the online questionnaire**, from **150** representatives of the business sector (**73%**), **5** representatives of workers (**2%**), and **17** representatives of various interest stakeholders (**8%**), **24** representatives of public authorities (**12%**). **10** respondents stated "other"² (**5%**). Regarding the origin of the respondents, **88%** of the questionnaire respondents came from Spain, **5%** from Sweden, **3%** from Croatia, **2%** from Ireland, and **1%** from Bulgaria.

The complete list of organisations that participated through the questionnaire or in meetings during the fact-finding meetings is available in chapter 5 of this report.

3. Primary data: findings and analysis

3.1 Effectiveness

² Includes public authorities.

According to the European Commission Better Regulation toolbox, the criterion of effectiveness "considers how successful EU action has been in achieving or progressing towards its objectives"³.

3.1.1 *Achievements in the implementation of the SUD and the NAPs*

It should be acknowledged that Member States initiated the transposition and implementation of the SUD **from very different starting points** when it was issued in 2009. Efforts and progress achieved by Member States since its entry into force differ, but the highest proportion of stakeholders (**41% of questionnaire respondents**) consider the implementation of the SUD and their related National Action Plans (NAPs) as **moderately effective** in terms of meeting their objective, and **24% as very effective** (*Question 3*).

3) How effective do you consider implementation of the Directive in Ireland and the related National Action Plan to have been (in terms of meeting their objective)?

		Answers	Ratio
Very effective		49	23.79 %
Moderately effective		84	40.78 %
Not very effective		43	20.87 %
I don't know		29	14.08 %
No Answer		1	0.49 %

There is consensus that the SUD has helped **raise awareness throughout the industry of the importance of integrated pest management (IPM) and best use of plant protection products (PPPs)** (Ireland, Bulgaria). It has also heightened awareness of the **need for increased responsibility of plant protection users to protect themselves and the environment** (Ireland, Bulgaria). Questionnaire results show that farmers are generally aware of the risk of pesticides to the environment and health, their level of awareness being **high according to 42% of questionnaire respondents**, and **moderate according to 35% of replies** (*Question 7*).

7) How do you assess the level of awareness among people working in agriculture of the risk of pesticides to the environment and health?

		Answers	Ratio
There is a high level of awareness		86	41.75 %
There is a moderate level of awareness		72	34.95 %
There is a low level of awareness		47	22.82 %
I don't know		1	0.49 %
No Answer		0	0.00 %

³ https://ec.europa.eu/info/sites/info/files/file_import/better-regulation-toolbox-47_en_0.pdf

Bulgaria: Bulgarian stakeholders consider that implementation of the SUD has led to a change in the attitudes of farmers regarding soil, plant and water preservation (employers). The measures envisaged in the Bulgarian NAP are being strictly implemented in terms of assessment and registration of PPPs for their marketing (employers). Some progress has also been made regarding the storage of unused pesticides and the management of empty packaging, as well as access to training. Concerning IPM, Bulgaria has detailed guidelines and a good system of pest forecast and controls in place (public authorities).

Croatia: In Croatia, stakeholders consider implementation of the SUD and the NAP to be effective, reporting that the use of pesticides and toxicity incidents in the country have both decreased since the NAP's adoption, and adding that the SUD implementation has improved environmental protection. Particularly, the establishment of some compulsory measures (training programmes for professional users, sprayer controls, and IPM practices) has been beneficial for reducing risks associated with pesticides use (various activities). Additionally, progress has been achieved in packaging, waste management and pesticides residues (employers). Moreover, according to national authorities, the country has greatly improved its risk evaluation system, which was achieved by setting up a national laboratory, updating its methodology, increasing the volumes of samples analysed, and establishing an updated and comprehensive registry of PPPs in use in the country. Finally, Croatian farmers have demonstrated great flexibility in adapting to the rules applying to the sustainable use of PPPs. Particularly compared to its neighbours, the country represents a positive example concerning the handling of pesticides and their waste management.

Ireland: Implementation of the SUD and its transposition into the National Action Plan are considered effective by all stakeholders. To be specific, the SUD has helped raise awareness throughout the agro-food industry of the importance of IPM and best use of PPPs. There is general agreement that Irish farmers use PPPs in a responsible way. Harmonised risk indicators show that the amount of active substances sold actually reduced by 28% from 2011 to 2018 and that authorities have issued very few derogations for emergency authorisations (3 to 6 emergency authorisations issued per year). These derogations are mainly used for small crops and for minor issues (employers, various activities, national authorities). Irish stakeholders highlighted that the Ministry of Agriculture has put in place a well-established system of pesticides registration (employers). Importantly, Ireland's achievements include a large take-up of IPM practices, the ban of aerial spraying, and the development of monitoring systems that ensure efficient controls and a very low rate of non-compliance. Major progress has been achieved in the area of training and education, enforced by a strong pesticides advisors group. National public authorities reported that 34 000 professional users, 150 equipment inspectors, 1 000 pesticide advisors and around 1 200 pesticide distributors have been trained and registered in Ireland. Additional training schemes and IT registration systems are being developed by the Ministry of Agriculture in collaboration with Teagasc. The latter delivers 70-80% of continuous education to professionals and farmers, and indicates that 95% of farmers have received some degree of farm advice on how to use pesticides. Finally, there is a growing recognition among policymakers in Ireland of the need to tackle the negative impact of pesticides on watercourses and natural courses. A major piece of legislation is under preparation on this matter to increase monitoring and water testing.

Spain: Implementation of the SUD in Spain is considered somewhat effective, with some stakeholders being more convinced of its effectiveness than others. The majority of stakeholders considered the SUD to have been successful in reducing risks and increasing professionalism (employers). The main achievements have been reached in training (with the issuance of an applicator card), in the outline of IPM guidelines, and in the continuous certification of users and equipment inspections (employers, various activities, public authorities). In particular, the compulsory inspection of machinery equipment has been very well implemented and coordinated between the Autonomous Communities and all the parties involved. This has also helped to modernise the machinery stock (employers). The SUD has also led to avoiding aerial treatment and the use of mass trapping, and has contributed to increasing awareness and disseminating good practices, as well as improving administrative coordination (trade unions). Major changes in farmers' and consumers' attitudes were also highlighted (various activities).


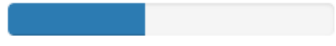
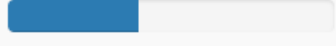
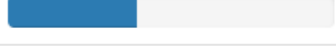
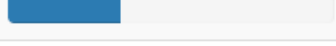
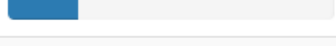
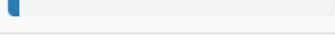
Sweden: Swedish stakeholders agreed that implementation of the SUD directive has been broadly effective in the country. It was acknowledged that the starting point in Sweden was relatively advanced when the Directive was first transposed (various activities). Application in Sweden has been particularly effective in awareness raising and in the level of cooperation reached between authorities, producers and growers, and retailers (various activities). The use of PPPs has been greatly reduced since the 1990s as a result of a combination of legislation, advisory services and farmers' initiatives, and also thanks to farmers carefully listening and responding to consumer demands. The number of emergency authorisations (trade unions) also showed a dramatic drop in Sweden.

3.1.2 Obstacles to effective implementation of the SUD and the NAPs

A) **Providing sufficient knowledge and education on the use of PPPs**

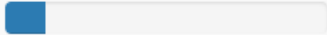

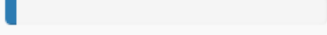
According to stakeholders, top of the list of obstacles to the sustainable use of pesticides is the **lack of knowledge of users of PPPs**, which has sometimes been reflected in tragic pesticides incidents such as the bee carnage of Medimurje County in Croatia or the hospitalisation of children showing signs of pesticides poisoning in Bulgaria. This is confirmed by the questionnaire results, which show that **49% of respondents consider a lack of knowledge to be the main problem related to the optimal use of pesticides** (Question 6).

6) What do you consider to be the main problems related to the optimal use of pesticides?

		Answers	Ratio
Lack of knowledge		101	49.03 %
Lack of technical support		86	41.75 %
Lack of information		82	39.81 %
Lack of awareness-raising		81	39.32 %
Lack of controls of their use		71	34.47 %
Lack of clear rules governing their use		44	21.36 %
No Answer		7	3.40 %

This correlates with a **lack of awareness-raising** (39%) and a **lack of information** (40%). In order to improve the knowledge of users of PPPs, all stakeholders highlighted professional training and advisory services as a crucial factor in the SUD's effectiveness. As many as **84% of stakeholder respondents** consider that **advisory services should play a greater role in promoting best plant protection practices** (*Question 9*).

9) What is, or should be, the role of (a) research and (b) advisory services in : Promoting best plant protection practices

		Answers	Ratio
Research		26	12.62 %
Advisory services		173	83.98 %
No Answer		7	3.40 %

Even though much progress has been made in this field in all Member States, stakeholders have pointed to several challenges and areas of improvement.

In Croatia and Bulgaria, stakeholders have pointed out **insufficient training** and an **insufficient number of advisors** (e.g. the ratio of advisors per farm stands at 1:700 in Croatia). More specifically, although Croatia has implemented widespread and compulsory training programmes for PPP users, the national authorities are still facing several obstacles in this field. One of these obstacles is that **most farmers see the training obligation as an imposition**, i.e. something that they are obliged to do, rather than something that opens up a real opportunity. Secondly, **training and advisory services are very expensive for farmers**, who have very limited financial resources. These services should not represent such a sizable cost to them. Thirdly, **professional training mainly covers information on how to handle pesticides correctly**. There is a fundamental lack of instructions on when pesticides should be used or avoided. Finally, **training on IPM is quite basic**, and thus insufficient. Therefore, stakeholders recommended a **more comprehensive and affordable training system for the benefit of farmers**. They also suggested that an **ex-ante advisory service** to users should be put in place to avoid the need for corrective action. Bulgarian stakeholders insist that **public and private funding for training should be increased** and recommend **making training mandatory** for those who use pesticides (various activities).

In Ireland, one of the main gaps in the education system on pesticides lies with **pesticides distributors**, who are very limited in the advice they can give on the purchase of PPPs. The requirements for qualifications to become a pesticide distributor are not at all in line with the requirements applying to pesticides advisors. This is considered a challenge, as **they are the last point of contact that users have before applying chemical products and these advisors could be valuable in providing end users with relevant advice**. Therefore, pesticides distributors should be more involved in the dissemination of information to the end users. Furthermore, stakeholders highlight the **reliance of the industry on sales representatives as the main source of advice on farms concerning the use of PPPs**. Much of the advice to farmers comes from the commercial sector, which usually responds to individual problems, rather than taking into account IPM strategies in the overall farm context (public authorities). Studies have shown that those who use *Teagasc* or

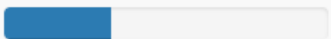






independent sources for advice have a greater awareness of IPM than those who take advice from sales representatives (trade unions). Irish stakeholders thus recommend that training be more **targeted to include strategic use and to promote IPM techniques** (trade unions). Finally, the lack of knowledge surrounding the use of PPPs is particularly evident in **amenity areas** (such as gardens or professional sports facilities with scaling of grass).

Spanish stakeholders consider that user information has not improved. They also indicated a **lack of more practical training for producers of PPPs** (more didactic training). In addition, stakeholders suggest training for public authority officials (various activities).

B) Improving the availability of new technologies and alternative solutions to the use of PPPs

By reducing PPPs, farmers have fewer and fewer solutions to protect their crops and maintain their viability. Alternatives to PPPs exist, particularly when considering proper applications of IPM, and stakeholders indicate being in favour of the use of gene modifications and biopesticides. However, the use of alternative solutions remains low, mainly because **they have not proven to be effective as PPPs for maintaining crops. 62% of questionnaire respondents** indicated that the primary reason for using pesticides is that they are more effective (better and more reliable) than other control techniques (*Question 2*).

2) What are the main reasons for farmers adopting and using pesticides?

		Answers	Ratio
Pesticides are cheaper than other control techniques		68	33.01 %
Pesticides are more practical/easier to use than other control techniques		94	45.63 %
Pesticides are more effective (better/more reliable control) than other control techniques		128	62.14 %
I am not aware of other control techniques/none exist		6	2.91 %
I don't know		0	0.00 %
Other reason		48	23.30 %
No Answer		1	0.49 %

In some cases, PPPs are not only necessary; they constitute the **only option to safeguard yields** against diseases linked to specific weather or soil conditions: neonicotinoids (Bulgaria, Ireland), glyphosate (Ireland, Bulgaria), fungicides (Ireland), or soil disinfectants (Spain). Another factor is that **alternative solutions to PPPs are expensive**. Indeed, the difference in prices between pesticides and other available alternatives is so considerable that many farmers cannot afford to use alternatives. In this regard, consulted stakeholders highlighted the need to address the problem of the lack of alternatives from an economic point of view.

Furthermore, the **removal of active substances from the market takes place faster than the development of alternative solutions**, thus slowing down farmers' effectiveness in growing produce. Stakeholders are all strongly in favour of **increased financial compensation for farmers** in order to **gradually integrate alternative solutions into farming practices** and to keep prices down. Finally, there is consensus among stakeholders that **technology is not yet ready to provide the necessary alternatives** (Bulgaria – public authorities). Scientists estimate that there is a time-lag of four or five years between the removal of active substances and the marketing of alternative products, since these are not as well researched as existing production methods, which may involve PPPs (Ireland – public authorities, Sweden – employers). In addition, stakeholders consider that **current regulation is not favourable to innovation** (Croatia - employers). For instance, it is very difficult to introduce a new molecule into the European market. **Increasing funds for research and development**, possibly via Horizon 2020, should thus be a key element of future EU legislation. Universities tend to be well placed to carry out such research (Sweden). In conclusion, alternative solutions to manage pests need to be **efficient and affordable** in order for farmers to **remain competitive and regulate prices**.

In addition, stakeholders strongly recommend **including new technologies and innovation in the scope of the SUD**, in particular the use of **drones** (Spain – employers, Bulgaria – various activities), in which there is considerable interest but which are not yet regulated at EU level. In this regard, **63% of questionnaire respondents consider that research should play a role in promoting certain innovations in pesticides among those working in agriculture** (*Question 9*).

9) What is, or should be, the role of (a) research and (b) advisory services in : Promoting certain innovations in pesticides among those working in agriculture


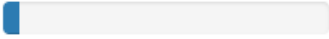
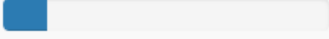
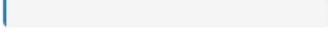
		Answers	Ratio
Research		130	63.11 %
Advisory services		71	34.47 %
No Answer		5	2.43 %

C) Tackling the different factors influencing farmers to adopt and to use PPPs

When deciding whether to use PPPs or to implement IPM into their farming practices, users of PPPs are influenced by many factors, including economic, political, social and environmental factors.

It is widely agreed by all stakeholders that **economic and financial pressure** has the greatest influence on farmers in terms of their use of PPPs. The questionnaire results show that **81% of respondents indicated that economic factors have a major influence on the choices of farmers. 47% of respondents also deem environmental factors to be very important** (*Question 1*). **Political and social factors are less important** according to 31% and 42% of the responses, respectively.

1) In your opinion, how important are political, economic, social and environmental influences in prompting farmers to adopt and use pesticides? : Economic influence

		Answers	Ratio
Very important		166	80.58 %
Fairly important		10	4.85 %
Not important at all		28	13.59 %
No Answer		2	0.97 %

Over the last few decades, farmers have seen significant increases in yields and profitability from using pesticides (Ireland, trade unions). The reduction of active substances on the market thus **forces farmers to make a choice between costs and revenues**, and it is often impossible to stop using PPPs if they want to stay competitive in the market. Ecological/environmental concerns are nevertheless high on the agenda, and studies have demonstrated that farmers are increasingly aware of their responsibility to the environment. However, over the last few decades, farmers have seen significant increases in yields and profitability from using pesticides. Even if farmers are educated on the use of PPPs and aware of the risks, in most cases, **yield drives profitability, encouraging farmers to use more PPPs** (Ireland – trade unions, Bulgaria - employers). Nonetheless, it should be reiterated that PPPs are often expensive: thus, **if farmers can avoid the purchase and use of PPPs, they will often willingly do so without EU or government pressure** (Sweden, Croatia – trade unions).

National agro-ecological conditions such as extreme climate events and weather or the health status of crops have been proven to play a major role in the use of PPPs, as the reduction of certain active substances makes it more difficult to treat certain pests. For instance, the landscape and humid climate in Ireland contribute significantly to the development of diseases that are treated with fungicides and neonicotinoids. The reduction of PPPs and in particular of fungicides has led to the loss of many crops, especially in winter, leading to a decrease of productivity. PPPs are then used as an element of insurance by farmers in order to avoid losing crops (Ireland – public authorities). Stakeholders consider that these specificities should be taken into account, in particular in the issuing of emergency authorisations. Other national specificities have been also evoked, such **resource constraints** in Spain (Spain – various activities).

Farmers are also being influenced by **consumer behaviour and choices** (Spain, Sweden, Bulgaria - employers) On the one hand, there is an unwillingness by many consumers to pay the higher costs for organic products arising from higher production costs and lower volumes compared to other more industrially produced agro-foods (Sweden). On the other hand, farmers feel pressure from consumers for **‘perfect’ products available in all seasons**, which makes it impossible to avoid some level of treatment.

Finally, some **socio-demographic factors** can also influence the farming practices of PPP users. For instance, in Croatia, farmers represent an ageing population, making the uptake of new techniques and alternative solutions more difficult (Croatia – public authorities, Spain – various activities). Young farmers usually tend to be keener on organic farming practices (Spain – trade unions, Ireland -

employers). Compared to older farmers, they also tend to be better educated or to have better opportunities to be educated, particularly livestock and grassland farmers. Grassland farmers also tend to be more educated than cereal farmers (Ireland - employers).

D) Monitoring and control of the effective implementation of the SUD

At EU level, stakeholders stress the **absence of a monitoring system for progress under the SUD** (Croatia – trade unions), indicating whether EU legislation has led to greater implementation of IPM systems. Stakeholders have put forward practical monitoring recommendations such as "model farms" or European pesticides advisors (Spain – various activities). **Monitoring and enforcing compliance with the law** is also considered a shortcoming of the SUD, as well as a **lack of sanctions** for those who do not comply with the regulations, both at EU and national levels (Spain – trade unions, Sweden). Swedish participants believe that penalties for countries that do not respect the rules should be enforced.

At national level, other monitoring shortcomings vary from one Member State to another. In Bulgaria, stakeholders point out the **lack of control on the purchase of substances**: any individual can buy PPPs in a store without any background checks. Therefore, stakeholders highly recommend that **pesticides should only be available based on a prescription by an agronomist** (Bulgaria – various activities). Bulgarian national authorities also indicate difficulties in inspecting the machinery and equipment used in agriculture for pesticides, even though general controls for safety are being carried out (Bulgaria – public authorities). In Croatia, PPP pesticides users are considered **reluctant to allow public inspections**, making it difficult for the competent authorities to exercise control (Croatia – public authorities). Spanish stakeholders highlighted the need to **strengthen surveillance programmes, in particular plant health surveillance networks** (Spain – various activities and employers).

The shortcomings in monitoring and control of the use of PPPs are being exacerbated by a **lack of relevant data both** at EU and national levels. The information available only provides numbers on pesticides production and sales, and not on the actual quantity of PPPs used (Croatia – various activities, Bulgaria – various activities).

E) Protecting the health and safety of PPPs users

Using pesticides has an impact on the working conditions and health of farmers and their families, sometimes leading to chronic diseases, cancers and work accidents. Pesticides users are usually obliged by law to follow safety procedures in all Member States, but in practice, the rules are sometimes neglected, especially in big companies (Spain – trade unions). For instance, under the requirements of the law on health and safety at work in Bulgaria, all workers handling poisonous chemical substances should follow a set of specific instructions regarding equipment and use of the substances. These instructions are mandatory for employers, but there is a lack of compliance on the ground. Stakeholders strongly recommended that **personal protection equipment be provided to all farmers** (Bulgaria – trade unions). They also suggested that incentives could be introduced for better compliance. Bulgarian trade unions suggested that **CAP payments should be made conditional on compliance with health and safety criteria**: funding should be allocated to farms ensuring safe working conditions (Bulgaria – trade unions). One Croatian trade union indicated that the union has

obtained a 10% salary increase for pesticides handlers complying with best protective measures (Croatia – trade unions).

Many farmers and consumers are not fully aware of the consequences of pesticides use on the environment and on human and animal health - especially amateur farmers and those using pesticides in private farms and cities (Bulgaria – various activities). Therefore, **raising awareness of the possible harmful effects of PPPs on their users is of primary importance**. Farmers should receive basic education, complemented by specific professional training and further health and safety training (Croatia – trade unions). The training of farmers should also **promote the use of proper hygiene and personal protective equipment when handling pesticides**.

Finally, there is a lack of data on the risks of pesticides to health. There is a need for more awareness-raising, including in schools, **training, and impact assessment of the risks of pesticides** on health (Bulgaria – trade unions).

3.2 **Relevance**

According to the European Commission's Better Regulation toolbox, the criterion of relevance *"looks at the relationship between the needs and problems in society and the objectives of the intervention and hence touches on aspects of design. Relevance analysis also requires a consideration of how the objectives of an EU intervention (...) correspond to wider EU policy goals and priorities"*.⁴

3.2.1 Role of aid and other public policies in relation to the application of pesticides

Stakeholders pointed to the different roles of public authorities, in particular to **educate further and create a demand-led system**, whereby the farmers (and consumers) request more training in the area of best practice adoption, and more adoption of IPM techniques. Stakeholders also stressed that policy-makers should **take into consideration that the removal of active substances would lower overall food production**. Therefore, **research and knowledge transfer should be encouraged to develop alternative solutions** to PPPs, as the SUD is not considered sufficient in its current form (Ireland, Croatia – public authorities). In this sense, there is a need for an **EU wide database, not only on the sales, but also on the use of the different categories of pesticides and their application rate**. Finally, when making decisions, policy-makers should **take into account the following factors**: national climate differences, consumer choices and behaviours, and science-based evidence rather than public opinion.

Secondly, stakeholders maintained that the role of aid needs to be associated with the **application and use of pesticides, as well as with the implementation of IPM** (Ireland, Croatia – public authorities). Every product arriving for approval is being assessed on a case-by-case basis, using very strict criteria. However, in reality, these products can be mixed with others. The role of aid should be to try to integrate the **SUD with the CAP, and with food safety aspects**. One Irish representative did not see a

⁴ https://ec.europa.eu/info/sites/info/files/file_import/better-regulation-toolbox-47_en_0.pdf

role for aid in relation to the approval and application of pesticides. [Regulation 1107/2009](#) is already widely regarded by all stakeholders as being effective and proportionate.

Finally, Swedish stakeholders believe that the role of aid and public policies should be to **safeguard fair market competition within the EU and for imports from third countries alike**. The stakeholders are also concerned by the **difficulties that the European Commission is encountering when calling for environmental compliance across Member States**. This problem should be urgently addressed because of the risk of national authorities being undermined, and the risk of penalising cooperative countries that actually follow EU rules (Sweden – various activities).

3.2.2 The SUD in relation to the CAP

Stakeholders generally agree that policymakers have **lost sight of the initial objective of the CAP**: to ensure that farmers remain economically viable. Indeed, stakeholders considered that the **CAP budget is being used as a panacea to fund too many elements** (environmental protection, climate change, water quality, animal health, etc.) that are related to the initial objective of the CAP. Stakeholders pointed out that the objective of the CAP was and should remain the following: to increase agricultural productivity, ensure a fair standard of living for the agricultural community, stabilise markets, secure the availability of supplies and ensure that supplies reach consumers at reasonable prices. In particular, CAP Pillar 1 funds were initially intended to compensate farmers for their loss of income but are now being used to solve other issues. Stakeholders believe that these **funds should be focused on keeping farmers viable and that extra funds should be provided for other issues**. In addition, as the EU is moving towards reducing the toolbox available to farmers, the gap between EU production and production by the rest of the world will continue to grow, and **CAP resources will need to increase**. **47% of questionnaire respondents consider that the CAP does not have the resources and funds needed to achieve the goals and objectives set under the current SUD**, while 30% consider that the resources of CAP can only partially enable the implementation of SUD provisions (*Question 10*).

10) Do you consider that the common agricultural policy (CAP) has the resources and funds needed to achieve the goals and objectives set under the current Directive?

		Answers	Ratio
Fully		25	12.14 %
Partially		61	29.61 %
Not at all		96	46.60 %
I don't know		23	11.17 %
No Answer		1	0.49 %

Nonetheless, stakeholders highlighted that the **CAP can encourage good practices through its tools, in particular eco-schemes**, to promote more sustainable production (while taking into account the three dimensions: economic, social and environmental). New eco-schemes can also incentivise land management practices (Ireland – public authorities).

Stakeholders highlighted the **crossovers between the SUD, the CAP and the Biodiversity Strategy and Green Deal**. They believe that these legislative acts can be harmonised without overlapping, by

delineating the responsibilities of each regulation more clearly, thus also making them more consistent (Ireland, Spain – various activities). In this sense, the CAP should be adapted to the Green Deal (Spain – various activities). However, a thorough **economic impact assessment** should be conducted beforehand and **better use of monitoring data** should be made, in order to maintain farmers' productivity. **Research and innovation** have a big role to play in achieving this.

In conclusion, the current CAP rules are unlikely to do much to change the overall use of PPPs, unless more resources are shifted to this area, which would help farmers make it financially viable to test alternative production and distribution methods.

3.2.3 The SUD in relation to the Green Deal and the Farm to Fork Strategy

71% of respondents considered that measures introduced under the new European Green Deal and the Farm to Fork Strategy in relation to PPPs could have a **negative impact on producers' profitability**, because PPPs are mainly used to increase farmers' efficiency and some of them are no longer available to use (*Question 11*).

11) Do you think that the measures introduced under the new European Green Deal and the Farm to Fork Strategy for Plant Protection Products (PPPs) could have a negative impact on producers' profitability?

		Answers	Ratio
Yes.		147	71.36 %
No		35	16.99 %
I don't know		22	10.68 %
No Answer		2	0.97 %

Some of the banned PPPs were relatively cheap and have been replaced by more expensive products, which in some cases are not as effective and have subsequently struggled to maintain yields (IE). The provisions in the new Green Deal are in line with the general spirit of environmental protection, but **do not comply with the spirit, nature and objectives of the CAP, according to 44% of respondents** (*Question 12*).

12) Do you think that the implementation of the Green Deal strategies related to the management and use of PPPs responds to and complies with the spirit, nature and objectives of the common agricultural policy (CAP)?

		Answers	Ratio
Yes.		65	31.55 %
No		91	44.17 %
I don't know		48	23.30 %
No Answer		2	0.97 %

Respondents also believe that these strategies could significantly compromise or jeopardise the achievement of the initial CAP objectives (Article 39, TFEU) (*Question 13*), in particular in terms of **increasing agricultural productivity (46%)**.

13) Do you consider that the new European Green Deal and the Farm to Fork Strategy could compromise or jeopardise the achievement of the specific objectives set out in Article 39 TFEU: : To increase agricultural productivity;

		Answers	Ratio
Yes, to a large extent		94	45.63 %
To some extent		65	31.55 %
No		37	17.96 %
No Answer		10	4.85 %

One of the main shortcomings is that the Green Deal and Farm to Fork strategy do not provide enough solutions to compensate for the negative effects of the implementation of these new measures. Farmers will have to choose between profitability and sustainability, which could result in a **substantial decrease in competitiveness, according to 66.5% of respondents** (*Question 14*).

14) Do you think that the implementation of some of the provisions of the Farm to Fork and Biodiversity 2030 strategies could undermine or hamper the competitiveness of European farmers in the current context of a globalised market economy?

		Answers	Ratio
Yes.		137	66.50 %
To some extent		40	19.42 %
No		21	10.19 %
I don't know		7	3.40 %
No Answer		1	0.49 %

All stakeholders supported both pesticide reduction and the promotion of organic farming through increased production. However, all agreed that **the targets set in the strategies at EU level (respectively -50% and +35%) do not seem realistic**.

Firstly, the **targets seem slightly arbitrary** to all stakeholders, and it was underlined that **no impact assessment** of the implementation of those targets had been conducted. The targets should be **based on scientific evidence** (Croatia, Spain - employers): more analysis is needed to assess the possible negative impact of EU measures on the profitability of producers. As an example, in Ireland, *Teagasc* investigated the [impact of fertiliser reduction targets on the dairy sector in Ireland](#). The investigation found that if fertiliser reduction targets were to be met, the profitability of dairy farms would decrease by 10%.

Secondly, all stakeholders believed that **targets and pesticide regulation should be adapted to national specificities** such as climate or agriculture entrepreneurship structure. In Ireland, the landscape and the humid climate contribute significantly to the development of diseases that are treated with fungicides and neonicotinoids. The reduction of PPPs and in particular of fungicides has led to the loss of many crops, especially when the weather is bad in winter, leading to a decrease of productivity. In Croatia, the vast majority of farmers have very small family-run farms. For these small farmers, it is much more difficult or even impossible to use PPPs properly.

Finally, stakeholders did not consider the reduction targets of 50% to be feasible, because they trigger concern among farmers. They recommended **focusing more on improving the safety of pesticides rather than reducing their quantity** (Ireland, Bulgaria, Spain - employers). Stakeholders underline that farmers understand the need for change, which is inevitable. However, it seems difficult to achieve the ambitious goals set at EU level and obtain results that are beneficial for all stakeholders. As a result, farmers are discouraged to take up activities in this agriculture sector (Bulgaria, Spain - employers).

In addition, Irish stakeholders were disappointed that the new Green Deal presents pesticides in a negative manner and as unnecessary. They also underlined that the new measures within the Green Deal are **focusing too much on environmental sustainability and are overlooking the economic and social pillars**.

Finally, stakeholders pointed out that the EU legislation on PPPs could lead to an overall **food security crisis** in the near future. At the moment, EU legislation assumes that farmers will be able to continue to produce enough food for all citizens (Ireland).

3.2.4 Competition with third-country imports

All stakeholders shared **concerns regarding products imported from third countries** that are not subject to EU pesticides legislation, which makes it difficult for EU farmers to compete on a level playing field. Therefore, farmers become less competitive due to cheaper products imported from outside the EU. The EU is constrained by WTO rules to maintain an open-trading economy, meaning that the EU needs to make sure its farmers can compete with the outside world. Otherwise, domestically produced food will come at a higher cost (Ireland – employers, Sweden). Stakeholders emphasised the need for **more assessment of the impact of the reduction of pesticides on farmers' competitiveness**, forecasting different scenarios and taking into account the voice of farmers in the assessment (Ireland – public authorities, Bulgaria). Moreover, they highly recommended a **CAP mechanism to compensate farmers for their loss of benefit, income, profit and competitiveness** (Ireland, Bulgaria, Croatia - employers). There was also a consensus that **import controls should be strengthened**.

Bulgaria in particular stands at the forefront on this issue because of its external border. Therefore, stakeholders insisted on the **need for more control and monitoring of these products**, as active substances banned in the EU can be imported/smuggled from third countries. More particularly, Bulgarian farmers also tend to lose competitiveness vis-à-vis other Member States, which are far more advanced in switching to more organic farming. As an example, one stakeholder indicated that the

share of organic farming in Bulgaria represents 3% of all farming, whereas in Austria organic farming represents 20%.

3.3 **Information on pesticides and participation of civil society**

3.3.1 *Information available on pesticides and public interest*

The vast majority of stakeholders (**86% of questionnaire respondents**) believe that EU citizens and civil society do not have sufficient information on all European legislation related to the sustainable management of pesticides (*Question 16*).

16) Do you believe that all EU citizens and civil society have sufficient information on all European legislation related to the sustainable management of pesticides?

		Answers	Ratio
To a large extent		7	3.40 %
To some extent		19	9.22 %
Not really		178	86.41 %
I don't know		1	0.49 %
No Answer		1	0.49 %

Stakeholders also highlighted that information related to the SUD and to pesticide legislation is **available online in a detailed, updated and user-friendly manner on EU websites** (Bulgaria - employers). However, it is up to citizens to actively seek out this information (Bulgaria - employers). In addition, citizens are not aware that this legislation comes from the EU or that there is an EU approach to the use of pesticides (Spain, Sweden – various activities). In this regard, the EU should step up its efforts to **provide more and better information** in this area (Sweden – various activities and public authorities).

In general, all citizens have an interest in the question of pesticides, but different levels of interest exist. Even when citizens may not be interested in the use of pesticides in agriculture, they are nonetheless **interested in food safety and affordable food prices** (Bulgaria – employers, Ireland – public authorities). In Croatia, stakeholders stressed a noticeable lack of interest and of visible public debate on pesticides (Croatia - employers).

The main reason behind the insufficient involvement of citizens might be their **lack of expertise or factual knowledge** (Croatia – employers, Ireland – employers and public authorities, Spain – various activities, Sweden – employers and public authorities). Indeed, legislation related to pesticides is rather complex and not fully understood by the public. Thus, **the scientific community should be more active in directly engaging with citizens to help educate the public** (Croatia – employers, Sweden – public authorities).

All stakeholders pointed out the **lack of objectivity from the media**, which often relay **inaccurate, biased and incomplete information, and even fake news** related to pesticides. The misinformation triggers **negative reactions** and opinion from the public towards pesticides (Bulgaria – employers, Ireland – public authorities, Spain – various activities), and does not contribute to a broader understanding of the topic (Ireland - employers). One particular case was made in Bulgaria regarding the poisoning of children after playing near a crop sprayed with pesticides: this case generated public fury towards pesticides. Bulgarian stakeholders emphasise that it was never made clear whether the poisoning had resulted from an illegal product or an authorised substance. If the substance was authorised, there must have been irregularities in its features, packaging or residues (Bulgaria - employers).


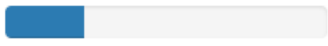
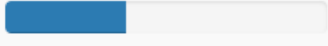
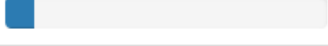
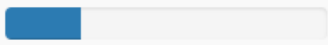
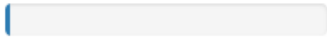
Some stakeholders stressed that **policymakers also contributed to shaping negative attitudes towards pesticides** and to **undermining the need for them** (Ireland – various activities). **Decision-making is too often based on public opinion and consumer trends** (Spain – various activities) **instead of on scientific data** and policymakers are often insufficiently informed as to the scientific impact of their decisions (Ireland – various activities, Spain).

Therefore, stakeholders strongly recommended conducting **awareness-raising campaigns** in order to better educate citizens and policymakers. In particular, as they lack trust in the industry (Spain - employers), citizens should be reassured that all authorised PPPs have been through a process of assessment and are allowed on the market only if proven not to cause any health or environmental issues (Bulgaria – employers, Ireland - employers). Citizens should also be better informed about the need for pesticides to provide food for the population and to keep prices affordable (Ireland – public authorities). In this sense, stakeholders believed that the **media should be more helpful in filtering the correct information presented to the public** (Bulgaria - employers). They also suggested that the **industry should be more proactive in communicating on the progress and efforts made on (the use of) pesticides** (Ireland – various activities, Spain – various activities).

3.3.2 *Participation of civil society*

Stakeholders report **different levels of engagement and interest in civil society** within each Member State and between different Member States. Agriculture and environment associations are usually well informed and the most active organisations in public consultations (Bulgaria – public authorities, Spain – trade unions). In general, **51% of respondents** consider that there is **insufficient political interest** in involving civil society organisations (*Question 17*).

17) What do you consider to be the main barriers to the active participation of organised civil society in the design, monitoring and evaluation of the Directive and the National Action Plans?

		Answers	Ratio
Lack of political interest in involving civil society organisations		105	50.97 %
Lack of financial resources of civil society organisations		50	24.27 %
Lack of capacity of civil society organisations (human resources, skills, etc....)		77	37.38 %
Other barriers		19	9.22 %
I do not think that there are any significant barriers		48	23.30 %
No Answer		3	1.46 %

The **lack of capacity** (37%) and **lack of financial resources** (24%) are also considered to be two major barriers to the active participation of organised civil society in consultations on the sustainable use of pesticides. More specifically, respondents to the questionnaire indicated that civil society was insufficiently involved in the **design (47%), the implementation (47%) and the evaluation and follow-up (51%)** of the SUD and related NAP (*Question 18*).

18) With regard to the implementation of the Directive, how would you assess the involvement of organised civil society in: : Design of the Directive and National Action Plans

		Answers	Ratio
Very good		7	3.40 %
Fair		90	43.69 %
Poor		96	46.60 %
No Answer		13	6.31 %

18) With regard to the implementation of the Directive, how would you assess the involvement of organised civil society in: : Implementation of the Directive and National Action Plans

		Answers	Ratio
Very good		9	4.37 %
Fair		87	42.23 %
Poor		96	46.60 %
No Answer		14	6.80 %

18) With regard to the implementation of the Directive, how would you assess the involvement of organised civil society in: : Evaluation and follow-up of the Directive and National Action Plans

		Answers	Ratio
Very good		4	1.94 %
Fair		83	40.29 %
Poor		104	50.49 %
No Answer		15	7.28 %

Swedish participants had divergent views as to whether civil society is involved in the design and evaluations of policies. Stakeholders indicated a **high level of involvement** in the European Commission's open consultations and government consultations, whereas national authorities estimated the level of involvement of civil society to be **low**.

In Spain, stakeholders deemed the **participation of civil society necessary but insufficient**, as civil society organisations have **little influence or power** (Spain – trade unions). Spanish stakeholders also indicated that civil society contributions have sometimes not been taken into account by national authorities (Spain – various activities).

In Bulgaria, stakeholders had the impression that **civil society was not sufficiently interested** in the question of pesticides and indicated a **lack of participation** by them in the debate (Bulgaria -

employers). Trade union representatives also underlined the poorly functioning social dialogue between employers and workers and the lack of collective work agreements.

In Ireland, stakeholders agreed that **civil society is involved in the discussion on pesticides** (Ireland – various activities) and is very **well organised to input their views into legislation** (Ireland - employers). However, Irish stakeholders highlighted the **lack of knowledge and understanding** regarding pesticides from some civil society organisations (Ireland – employers and various activities). They stressed the need for **adequately qualified specialists** working on the topic, especially in terms of toxicology and chemistry (Ireland – various activities, Spain – various activities). Organisations should be better informed (Spain – various activities). There was also a call to make farmers' voices more clearly heard (Ireland – public authorities).

In Croatia, stakeholders indicated a **very low involvement of civil society** on all European legislation related to the sustainable management of pesticides (Croatia – public authorities). They underlined that the discourse on pesticides was **mediated by NGOs advocating for a complete ban on pesticides**. These extreme positions do not have any scientific foundation. In such a climate, the **interests of farmers and food producers remain essentially neglected** (Croatia - employers).

3.4 Looking ahead

Agro-food is an important productive sector for Europe, in terms of both economic and social value. **EU agriculture is currently facing several and inter-related challenges, with far-reaching consequences for the future**. These entail the sustainability and competitiveness of the food system, climate change effects and action, the ageing of farmers and depopulation in rural areas (especially highlighted in Spain by employers and trade unions).

More specific to the scope of the directive, the most discussed issues were those **linking farming profitability to environmental action**. Some countries, such as Spain, felt more directly exposed to the impact of climate change, while others, such Croatia, mostly feared unfair competition from third countries.

On the one hand, **climate change represents a threat, as it is giving rise to new pest and invasive species** (Croatia – public authorities). On the other hand, the scope of lawful active substances in the EU is narrowing, on environmental protection grounds (Croatia - employers). This implies **reduced market availability of agricultural produces, with some foods particularly at risk**. Stakeholders highlighted that certain crops simply cannot be produced without using PPPs, given current technology (Spain – various activities). Lower or failed production has a negative economic impact on farms. Thus, the ability to keep production levels viable depends critically on new affordable, efficient and safe alternative solutions to pesticides. **The challenge is indeed finding products less harming on health and environment that are as efficient as chemical products** (Bulgaria – public authorities, Ireland – trade unions, Sweden – public authorities). Only efficiency gains would make a further reduction in the use of pesticides possible (Sweden – various activities). Investing in biotechnology and agricultural digitalisation certainly represents a promising outlook. Stakeholders welcomed innovation, but once again, called for a holistic approach. In fact, **European farming structure and the advanced average age of farmers seriously jeopardise the widespread application of new technologies** (Croatia – various activities). At the same time, a massive uptake of

these technologies could work as a pull factor, attracting young entrepreneurs into agriculture (Spain – employers).

A broader perspective should also be adopted to address the challenges arising from **international trade**. European farmers face strong **competitive pressure from non-EU producers**, as the latter do not have to abide by the same environmental and quality standards (Sweden – employers and trade unions). Moreover, the global scale could make R&D investment into alternative products by private multinational companies more difficult (Bulgaria – public authorities).

Strategic autonomy in food supply was also discussed. **Outsourcing the production of food to areas with soft rules makes raising environmental and health standards in the EU pointless** (Ireland - employers).

4. Secondary data: literature review of EESC work

The EESC believes in the need for a comprehensive and sustainable EU agro-food policy ([NAT/711](#)). In this regard, the Committee has recently expressed its views on the Farm to Fork and 2030 Biodiversity Strategies within the framework of the Commission's European Green Deal, commenting on them also in relation to trade and supply chains.

In [NAT/787](#), EESC evaluated the Commission's Farm to Fork strategy, concluding that it does not deliver sufficiently on economic, environmental and socio-cultural sustainability. The supply-chain dynamics of agro-food products should thus be reshaped to obtain lasting improvements for producers, processors and retailers, using all available policy instruments (including the new CAP). Fair food prices (reflecting the true cost of production for the environment and society) should be central to a truly sustainable EU food policy. Moreover, the Committee urges the EU to ensure true reciprocity of standards in preferential trade agreements. The option of a European Food Policy Council is also put forward.

In [NAT/786](#), the EESC welcomes the Commission's efforts to develop a Biodiversity Strategy for 2030 in the European Green Deal framework, while pointing out that action to protect remaining natural resources needs to be significantly increased in the EU. The EESC regrets that the EU's new financial plan for 2021-2027 contains no sign of full, effective, consistent integration of biodiversity. Moreover, the Committee stresses that farmers and forest owners cannot be expected to bear the cost of protecting biodiversity. Rather, providing this "public good and value" should become a useful source of income for them.

In [NAT/791](#), the EESC specifically reflects on the compatibility of EU trade with the European Green Deal. The Committee welcomes the ambition of the EGD and of the Farm to Fork and Biodiversity Strategies. At the same time, these strategies cannot erode the viability and competitiveness of EU farming and the agro-food sector through the imposition of higher costs and standards, which competitors are not willing to adopt and implement. Moreover, in the light of the consequences of the COVID-19 crisis, a fair and rules-based EU single market and international trade are essential to drive economic recovery. The EESC thus proposes that all future EU trade deals incorporate the European green strategies as global standards on sustainability. It is widely recognised that trade in agriculture plays a core role in achieving the SDGs (see also [REX/486](#)). In

addition, the EESC requests that the impact of the Green Deal F2F and Biodiversity Strategies on EU trade agreements and the farming sector undergo a detailed impact assessment.

The EESC believes that much more consistency and coordination across EU policies are needed: an adequate CAP budget is essential to cover the additional demands on European family farmers.

Additionally, research must be intensified to better define the term "organic" and to assess the real net contribution of organic farming to global sustainability, including biodiversity. **The impact on drop production induced by land conversion into organic farming has to be assessed.**

In line with the position illustrated above, in [NAT/793](#) the EESC opposes the proposed (Commission) recognition of Ukrainian seed as equivalent to cereal seed harvested, produced and controlled in the European Union. Indeed, the adoption of the legislative proposal should be conditional on guarantees of **compliance with European health and environmental requirements and the absence of unfair competition.**

Ukrainian producers have access to certain substances (both in active weed control and pest protection) that are banned in the European Union. These divergences lead to a **distortion of competition and would result in products that do not comply with EU standards being able to enter the territory of the European Union.**

Safeguarding food safety is also a priority for the Committee, as stated in [NAT/732](#). In this opinion, the EESC addresses **transparency in scientific assessments and governance of the European Food Safety Authority (EFSA)**, fully supporting Commission's initiative aimed at **increasing the effectiveness of the food supply chain monitoring system**. The Committee advocates maximising the Agency's risk analysis capacities for **greater cooperation with Member States** to help give the public, the media and civil society as a whole a better perception of reliability and safety.

In [NAT/763](#), EESC also explored the **role of agro-ecology and short chains to respond to food challenges**. While acknowledging that this alternative model is not suitable for all farms, and that it does not replace the need for food that is not locally produced, the EESC sees it as fundamental to sustainable development. Indeed, innovative systems that connect consumers and producers together, such as CSA (community-supported agriculture) and other "basket" schemes, are growing across Europe, with the support of regional and local authorities. Many of these producers practise organic farming or apply other environment-friendly methods that are not covered by a label. Short-chain sales offer a **real opportunity for small structures to build up the added value and profitability of farms.**

The EESC is going to expand its work on pesticides and a toxin-free environment in a future opinion on the EU Chemicals Strategy ([NAT/807](#)).

5. List of organisations consulted

The EESC would like to thank the following organisations sincerely for their contributions⁵:

⁵ 29 responses to the online questionnaire were submitted by Spanish independents

Organisation name	Member State	Group	Consultation via	
			Questionnaire	Meetings
Agria S.A.	Bulgaria	I	x	
Association of Agricultural Producers	Bulgaria	III		x
Bulgarian Association of Agricultural Land Owners	Bulgaria	I	x	x
Bulgarian Food Safety Agency	Bulgaria	Other		x
Bulgarian Industrial Association	Bulgaria	I		x
Climate Action Bulgaria	Bulgaria	III		x
Confederation of Independent Trade Unions in Bulgaria	Bulgaria	II		x
FOA Bioselena	Bulgaria	III		x
National Association of Young Farmers in Bulgaria	Bulgaria	III	x	x
National Federation Agriculture PODKREPA	Bulgaria	II		x
National Grain Producers Association	Bulgaria	III		x
National Union of the Agricultural Cooperatives in Bulgaria	Bulgaria	III		x
Croatia Chamber for Trades and Crafts	Croatia	I	x	x
Croatian Chamber of Economy	Croatia	I		x
CROCPA Croatian Crop Protection Association	Croatia	I		x
Earth Trek	Croatia	III	x	
Environmental Institute Ecologica	Croatia	III		x
Iskra Zelina Chemical Industry d.o.o.	Croatia	I	x	
Ministry of Agriculture, Phytosanitary Policy Sector, Department for Sustainable Use of Pesticides and Pesticide Residues	Croatia	Other	x	x
Trade Union of the Employed in Agriculture, Food, Tobacco and Water Industries of Croatia)	Croatia	II	x	x
University of Zagreb, Faculty of Agronomy	Croatia	III	x	x
Agricultural Agriculture and Food Development Authority (Teagasc)	Ireland	Other		x
Animal and Plant Health Association	Ireland	I		x
Federation of Agrochemical Retail Merchants	Ireland	I	x	x
Irish Co-operative Organisation Society	Ireland	III		x
Irish Creamery Milk Suppliers Association (ICMSA)	Ireland	III	x	x
Irish Farmers Association	Ireland	III	x	x
Irish Organic Association	Ireland	III		x
Department of Agriculture, Food and the Marine - Pesticide Registration and Control Divisions (PRCD)	Ireland	Other	x	x
University College Dublin, School of Agriculture and Food	Ireland	III		x
ACOPROVE	Spain	I	x	
ADVA	Spain	I	x	
Ademuz Consumer Group	Spain	III	x	
AGRICOLA SOLER E HIJOS, S.L.	Spain	I	x	
Agricultural Health Econex SL	Spain	I	x	

Agricultural Insurance of Levante	Spain	I	x (2)	
Agricultural Mechanical Station	Spain	I	x	
Agroalfinden	Spain	I	x	
Agroblainpa SL	Spain	I	x	
Agrobrox	Spain	I	x	
Agrochemicals Torre Pacheco SL	Spain	I	x	
Agrosdemeter	Spain	I	x	
Agro-food cooperatives of Spain	Spain	I	x	
Agro-food cooperatives in Huelva	Spain	I	x	
Agroservices LOS TRIVIÑOS, S.L.	Spain	I	x	
Agrotaw	Spain	I	x	
Agrozvi	Spain	I	x	
Alliance for Sustainable Agriculture (ALAS)	Spain	III	x	
Andalusian Integrated Production	Spain	I	x	
API Alcala Sierra Frailes	Spain	I	x (4)	
API Inter-Olivo	Spain	I	x	
API Sierra de las Villas	Spain	I	x	
APP LA RIOJA	Spain	I	x	
AP SAT Santa Teresa	Spain	I	x	
Aprasoa	Spain	III	x	
Ariza Agricola SAT	Spain	I	x	
Aseagrimed	Spain	I	x	
Association Albar	Spain	III	x	
Association APQUIRA	Spain	III	x	
Association of Phytosanitary Distributors of Navarra	Spain	I	x	
Autonomous Community of Murcia	Spain	Other	x	
Autonomous Community of the Principality of Asturias	Spain	Other	x	
AVR SCA	Spain	I	x	
Bayer CropScience SL	Spain	I	x (2)	x
C.A.C.O.	Spain	I	x	
Calidad Certificada SLU	Spain	I	x (2)	
Campo de Lorca SCL	Spain	I	x	
CANARAFLOL SCL	Spain	I	x	
Certis Spain	Spain	I	x (2)	
COCOPE	Spain	I	x	
Consegal	Spain	I	x	
Cooperative Alimer	Spain	I	x	
Cooperative Crisol/Arboreto	Spain	I	x (2)	
Cooperative El Albaricoquero	Spain	I	x	
Cooperative La Garbancita Ecológica	Spain	I	x	
Cooperative Odarpi	Spain	I	x	
Cooperative Olenad SCA	Spain	I	x	
Cooperative San Sebastián de Alfacar	Spain	I	x	
Cooperative Thader Cieza	Spain	I	x	

Coordination of Farmers Organisations (COAG)	Spain	III	x (3)	x
Coplaca Sdad Coop	Spain	I	x	
Council of Water, Agriculture, Livestock, Fisheries and the Environment – Region of Murcia – Vegetable Health Service	Spain	Other	x (2)	
Council of Ecological Agriculture of the Region of Murcia	Spain	Other	x	
Delagro	Spain	Other	x	
Dominguez	Spain	I	x	
Ecologists in Action	Spain	III	x	
EFA El Soto	Spain	I	x	
Entrepreneurial Association for Plant Protection (Aepla)	Spain	I	x	x
Federation of Agricultural Cooperatives	Spain	I	x	
Federation of Agricultural Cooperatives – Region of Murcia (FECOAM)	Spain	I	x (14)	
Fedisprove	Spain	I	x	
Fruca Marketing SA	Spain	I	x	
Fruits and Vegetables Río SL	Spain	I	x	
Frutas La Carrichosa, SCL	Spain	I	x	
FRUTAS DE CARAVACA, S.C.L.	Spain	I	x	
Gallego y Lopez-Cozar	Spain	I	x	
General Council of Official Associations of Agricultural Engineers (CGCOIA)	Spain	Other	x	
General Union of Workers (UGT)	Spain	II		x
Government of Aragon	Spain	Other	x	
Government of the Balearic Islands – Plant Health	Spain	Other	x	
Government of Castilla and Leon	Spain	Other	x	
Government of Galicia	Spain	Other	x	
Government of Navarra	Spain	Other	x	
GTI AGRO	Spain	I	x	
Healthy Life Association	Spain	III	x	
HORTAMIRA S.C.L.	Spain	I	x	
Integrated Center for Training and Agrarian Experiences (Cifea)	Spain	Other	x	
Interprovincial Association of Distributors for Agroprotection	Spain	I	x	
ITA AGROVALLE SL	Spain	I	x	
INSUR Plant Protection SA	Spain	I	x	
LARM SL	Spain	I	x	
LA CAÑADA SAN MIGUEL	Spain	I	x	
La Vega de Pliego SCL	Spain	I	x	
Lemon and Grapefruit Interprofessional Association (AILIMPO)	Spain	I	x	
Leonese Plant Protection Association (Aleprove)	Spain	I	x	
Mediterranean Association of Organizations of Agricultural Producers (AMOPA)	Spain	I	x	
Ministry of Agriculture, Fisheries and Food, Directorate General of Agri-food Health, Plant Health and Hygiene	Spain	Other	x (2)	x

Ministry of Agriculture in Andalusia	Spain	Other	x	
Ministry of Agriculture in Catalonia	Spain	Other	x	
National Association of Agricultural Engineers	Spain	Other	x	
NTRA. SRA. DE LOS REMEDIOS, S.C.A.	Spain	I	x	
NTRA. SRA. DE LA ESTRELLA S.C.A.	Spain	I	x	
Nutesca SL	Spain	III	x	
Official College of Agronomic Engineers of the Region of Murcia	Spain	Other	x	
Oleomontes	Spain	II	x	
Oleosar Integrated Management	Spain	I	x	
Organization of Consumers and Users (OCU)	Spain	III		x
Plant Defence Group of Santa Susana, Catalonia	Spain	III	x	
PROEXPORT	Spain	I	x	
Qabtur Agrochemicals	Spain	I	x	
Red de Alerta e Información Fitosanitaria (RAIF)	Spain	Other	x	
SAT LOS SERRANOS	Spain	I	x	
SCA CIUDAD DE JAEN	Spain	I	x	
Segovian Conservation Tillage Association	Spain	III	x	
SEO/BirdLife	Spain	III	x	x
SM SC	Spain	I	x	
Spanish Association of Young Farmers (ASAJA)	Spain	III	x (2)	x
Spanish Food Safety & Nutrition Agency (AESAN)	Spain	Other		x
Spanish Society of Ecological Agriculture and Agroecology	Spain	I	x	
SUCA SCA	Spain	I	x	
Sumicamp SL	Spain	I	x	
Suterra Biocontrol SL	Spain	I	x	
Syngenta SA	Spain	I	x	x
Technical Association of Integrated Olive Production	Spain	III	x	
TIMAC Agro	Spain	I	x	
TRAGSATEC	Spain	Other	x (2)	
Tragsa Group	Spain	I	x	
Union of Cooperatives of Agaca	Spain	I	x	
Union of Farmers and Ranchers Unions	Spain	I	x	
Union of Farmers and Ranchers Unions – Region of Murcia	Spain	I	x	
Union of Small Farmers in Andalusia	Spain	I	x	
URCACYL	Spain	I	x	
Valencian Association of Farmers (AVA)	Spain	I	x	
Valencian Generalitat	Spain	Other	x	
Villa Del Prado Town Hall	Spain	Other	x	
Virto Group	Spain	I	x	
Workers' Commeetings (CCOO)	Spain	II		x
WWF Spain	Spain	III	x	
YEFRUT S.C.L.	Spain	I	x	
Federation of Swedish Farmers	Sweden	III	x	x

Rural Sweden "Hela Sverige ska leva"	Sweden	III	x	
Swedish Federation of Green Employers	Sweden	I	x	x
Sweden's National Food Agency	Sweden	Other		x
Swedish Board of Agriculture	Sweden	Other	x	x
Swedish Chemicals Industry	Sweden	Other	x	
Swedish Environmental Protection Agency	Sweden	Other	x	x
Swedish Municipal Workers' Union	Sweden	II	x	x
Swedish Plant Protection Companies' Trade Association	Sweden	I	x	
Swedish Trade Union Confederation	Sweden	II	x	
Swedish University of Agricultural Sciences	Sweden	Other	x	x