

Pesticides in the new CAP: business as usual puts nature and human health at risk

BirdLife Europe and European Environmental Bureau policy briefing

Key messages:

- » The use of synthetic pesticides contaminates our air, water and wider environment, which harms human health and continues to drive biodiversity decline in agricultural areas. Therefore, Member States urgently need to reduce the use and risk of pesticides and deliver the reduction targets of the Farm to Fork Strategy: a 50% reduction in the use and risk of chemical pesticides and in the use of more hazardous pesticides by 2030.
- » Draft CAP strategic plans fail to sufficiently pursue pesticide use reductions on European farms. The conditionality requirements relevant to pesticide use are implemented too weakly by Member States and serious reduction targets and timetables are missing in the plans. This makes it highly unlikely that the current CAP plans will deliver any reduction of pesticides and achieve the targets of the Farm to Fork and Biodiversity Strategies, expected to be made legally-binding in the Sustainable use of Plant Protection Products Regulation.
- » Both eco-schemes and pillar 2 measures need to be strengthened to ensure a shift to agro-ecological practices that would enable good implementation of integrated pest management, as required by EU law, and truly lower the pesticide use.
- » CAP subsidies should be targeted towards supporting farmers financially and technically in their transition to low-input farming systems and this spending should be result driven. Farmers should be offered a package of measures that promote the uptake of non-chemical alternatives to pesticides (agronomic, mechanical, physical, biological) through the CAP strategic plans to ensure a sustainable and resilient agriculture.

1. Introduction:

The use of and exposure to chemical pesticides is a matter of serious concern for [human health](#), [biodiversity](#) and the [environment](#). Yet, European agriculture is heavily dependent on its use.

According to current legislation on the Sustainable Use of Pesticides (SUD), Member States shall take all necessary measures to promote low pesticide-input pest management, giving priority to non-chemical methods. Since 2014, integrated pest management (IPM), which means only applying chemical pesticides as the very last resort, has been mandatory for farmers. IPM, which is very loosely defined in the sustainable use directive, includes crop rotation, the use of adequate cultivation techniques and protection and enhancement of important beneficial organisms (e.g. by establishing ecological infrastructure inside and outside production sites). The SUD also states that Member States are obliged to reduce their dependence on the use of pesticides. Moreover, it states that adequately-sized buffer zones must be established where pesticides must not be used or stored in order to protect non-target aquatic organisms and safeguard surface and groundwater used for the abstraction of drinking water.

In its [2020 report](#), the European Court of Auditors (ECA) outlined that one of the various problems in achieving the objectives of the SUD was that the Common Agricultural Policy (CAP) contributed too little to the application of IPM.

Indeed, the recent FoodWatch report “Locked-in Pesticides”¹ shows that the use of pesticides has not decreased in the EU during the last decade. This is due to a lack of adequate implementation of IPM through the CAP and a lack of commitment of MS to reduce their dependence on the use of pesticides. Instead, the report states that, *“herbicide use has increased since the 1990s, and it is very likely that pesticide-use intensity (the number of doses per area) has also risen, because more low-dose pesticides are being used, while the total amounts sold have either remained stable or increased.”*²



This briefing assesses whether the national plans setting out the details of the new CAP are likely to deliver better on the roll out of IPM and ultimately on reducing pesticides use between 2023 and 2027. The analysis is all the more pertinent as on the 22nd June, the Commission unveiled a new proposal for sustainable use of pesticides regulation (that will replace the current directive) and the CAP will be, once more, crucial for its implementation.

Photo: AdobeStock

1 - https://www.foodwatch.org/fileadmin/-INT/pesticides/2022-06-30_Pesticides_Report_foodwatch.pdf

2 - Ibid., p.5

2. Baseline rules: too lax to reduce the need for pesticides

Good Environmental and Agricultural Conditions (GAEC) are part of the CAP's green architecture and refer to the baseline requirements that must be respected by farmers and other beneficiaries of area- and animal-based CAP payments. In addition, farmers are required to respect statutory management requirements (SMR) which are specific provisions from EU laws on animal and plant health; animal welfare; and the environment. While the CAP legislation outlines the objective and scope of each GAEC, Member States are given the flexibility to decide how to implement the standards. The rules and implementation choices for relevant GAECs and SMRs are reviewed below.

2.1. GAEC 4 - establishment of buffer strips along water courses

GAEC 4 requires the establishment of buffer strips along watercourses, where fertilisers and chemical plant protection products cannot be applied, to protect against pollution. The minimum width is 3 metres; however, Member States can derogate from the minimum width in areas with significant dewatering and irrigation ditches. By setting the minimum width of buffer strips at 3 metres (and allowing derogations), GAEC 4 is direly insufficient. For instance, the European Food Safety Authority (EFSA) often fixes buffer zones at around 10-50 metres for using pesticides next to water courses. In other words, buffer strips with a width of 3 metres are insufficient and not effective to reduce water contamination and biodiversity degradation. Establishing buffer strips around water courses not only protects groundwater by preventing direct discharge and indirect pollution of water, but also protects fauna, flora and human health.

While some member states have set a larger width (**Latvia, Spain**), many countries are weakening this GAEC by restricting the watercourses it applies to. In **Poland**, GAEC 4 only applies to ditches with a width of more than 5 metres, lakes and water reservoirs, natural watercourses, canals, water intakes if no protection zone has been established under the Water Law Act, and areas of the maritime coastal belt. Since most ditches draining farmland are of a smaller width than 5 metres, this standard is currently not applied in practice. Similarly, GAEC 4 in **Latvia** and **Spain** does not address the majority of smaller drainage ditches, as very few of them qualify as watercourses - yet, all end up in rivers. **Sweden** suggests a 2-metre width of buffer strips for fertiliser (in direct breach of the CAP regulation) and a 6-metre width of buffer strips for pesticides. **Italy, Slovakia, the Czech Republic** and **Germany** plan to fix buffer zones at the minimum requirement of 3 metres.

2.2. GAEC7 - crop rotation and diversification

GAEC 7 requires farmers to apply crop rotation, but - if duly justified - allows exemptions and thus gives Member States the possibility to implement crop diversification as an alternative.

Latvia, Poland and Sweden plan to implement the less ambitious version of GAEC 7 and only opt for crop diversification, meaning that they maintain the status quo and make no additional efforts to improve current greening rules. **Italy** proposes to implement crop rotation; however, too many exceptions make the rule poorly effective. In **Spain**, Gaec 7 requires both crop rotation and crop diversification, while in **Germany, the Czech Republic and Slovakia** only crop rotation will be applied as the main standard. In most cases, exemptions are granted and the rules for secondary or catch crops are weakly defined. For example, summer and winter varieties of the same crop are considered as different crops, or the minimum length of secondary crops on land is too short to ensure an appropriate break between the main crops.

Growing the same main crop year on year on the same land without at least alternating with a proper secondary crop (winter cover crops) is in direct breach of GAEC 7 - a criticism the EC repeats in several of their Observation Letters to Member States.

Rotating different crops on the same area of agricultural land is key to breaking the reproductive cycle of pests and improving soil health, which are two crucial approaches to reduce the need for pesticides.

Our [previous assessment on soil health](#) shows that only a few Member States propose a good approach under this GAEC and combine practices on crop rotation and crop diversification. To effectively reduce pesticides inputs, GAEC 7 needs to be strengthened and should ensure that all arable farmers apply long crop rotations including leguminous crops, while farmers with permanent crops should increase biological and structural diversity within and between their parcels.³

2.3. GAEC8 - space for nature on farms

In the area of biodiversity, GAEC 8 requires farmers to devote a proportion of arable land to non-productive areas and features to improve biodiversity on farms. This is crucial to provide habitats for beneficial insects and other species which predate on pests. Member states can implement this rule in three different ways (see our [previous assessment on space for nature on farms](#)); however, as outlined in this assessment, ambition is lacking across the board. [Scientific studies](#) have shown that at least 10% of high diversity landscape features and non-productive areas are needed to start to restore agricultural ecosystems. Yet, none of the Member States set a minimum percentage for non-productive features that is higher than what is required by EU rules (3-4%). In addition, more than half of the CSPs (17) offer farmers an option to include productive elements such as catch crops and nitrogen fixing crops which offer no significant benefits to biodiversity.

3 - https://www.pan-europe.info/sites/pan-europe.info/files/PositionPaper_CAP_post2020_final.pdf

2.4. SMR 7 & 8 - EU Pesticides laws

The CAP regulation contains two statutory management requirements related to pesticide use: SMR 7 and SMR 8. SMR 7 links CAP payments to the [EU Regulation on plant protection products](#), requiring the “proper use” of plant protection products (first and second sentence of article 55 of the regulation), while SMR 8 links to the SUD. However, it must be noted that, similarly to the current CAP, neither the last part of article 55 of the regulation on plant protection products (PPPs) nor article 14 of the SUD,⁴ which require farmers to apply Integrated Pest Management, are included in the CAP conditionality.

In other words, there are no mandatory requirements in the CAP specifying that, in order to receive direct payment, farmers have to make plans to reduce pesticide use as well as to prove that they are applying integrated pest management (IPM), despite this being mandatory under the SUD.⁵



Photo: CarolineHerman

3. Result indicator R.24 - ambiguous on Member States' ambition to reduce pesticides

Indicator R.24 is the only CAP metric that can give an idea of Member States' ambition with regards to reducing pesticides use. It measures the “*share of utilised agricultural area (UAA) under supported specific commitments which lead to a sustainable use of pesticides in order to reduce risks and impacts of pesticides such as pesticides leakage.*”⁶

The value of this indicator set by member states ranges from 1,25% (Spain) to 55,9% (France), with Cyprus, Lithuania and Italy setting a 0 value in their submitted CSPs. Nine countries/regions have set the value below 10% as can be seen in Figure 1.

4 - Article 14 of the SUD states: “Member States shall take all necessary measures to promote low pesticide-input pest management, giving wherever possible priority to non-chemical methods, so that professional users of pesticides switch to practices and products with the lowest risk to human health and the environment among those available for the same pest problem.”

5 - <https://www.pan-europe.info/sites/pan-europe.info/files/12%20points%20regarding%20why%20the%20CAP%20is%20broken%20on%20pesticides.pdf>

6 - Regulation (EU) 2021/2115 establishing rules on support for strategic plans to be drawn up by member states under the common agricultural policy (CAP Strategic plans)

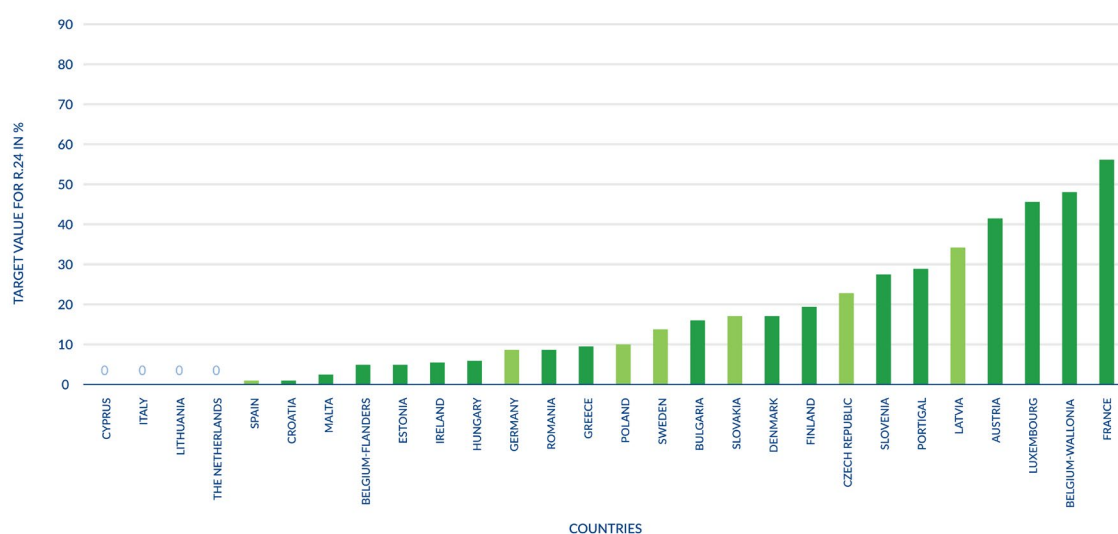


Figure1: Target value for R.24 Sustainable and reduced use of pesticides

The low target value of the indicator R.24 in more than a third of the countries is highly concerning, but it is only part of the problem. Remarkably, the indicator says very little about whether any pesticide use reduction might be achieved or not. Indeed, it merely refers to the area covered by agri-environment-climate measures, eco-schemes or sectoral interventions that are related to pesticides reduction. However, there is no assurance that these measures will lead to an actual pesticides reduction. Thus, even targets that look ambitious on paper do not give guarantee that they will lead to adequate pesticides reduction on the ground.

Furthermore, some countries are including irrelevant measures under R24 to inflate its percentage. **Poland** is one of the countries that has set the value of the indicator very low (10,52%), but even that value seems to be inflated as it includes areas of AECDs related to protection of valuable habitats and species where pesticides are normally not used, so it is impossible to speak about reduction or sustainable use. The target for **Latvia** looks quite ambitious (34.8%) but very few of the included measures go beyond basic planning and additional reporting on the use of pesticides.

R.29 “Share of utilised agricultural area (UAA) supported by the CAP for organic farming” is another result indicator that can to a certain extent help create a picture of the level of ambition in the EU’s shift to zero/low pesticides farming. However, analysing R.29 is not within the scope of this briefing. According to the European Commission’s overview of submitted CSPs⁷, 21 CAP plans aim to increase the area receiving CAP support for organic farming by at least 25% (in proportional terms) by 2027 in comparison with the level in 2018. Of those 21, eight propose to at

7 - https://ec.europa.eu/info/sites/default/files/food-farming-fisheries/key_policies/documents/csp-overview-28-plans-overview-june-2022_en.pdf (page 25)

least double it. Despite increased ambitions, according to IFOAM organics Europe, *“some countries lack ambition to contribute nationally to the EU’s target of 25% organic farmland by 2030, either in terms of targets, either in terms of weak interventions, and low budgets to develop organic farming.”*⁸

The impact indicator I.18 will be used to evaluate the impact of the CAP and the extent to which Member States reduced the use of pesticides over the programming period. It is composed of 3 indicators: 1. Sales of pesticides, 2. The Harmonised Risk Indicator and 3. Sales of more hazardous pesticides. These indicators have been strongly criticised by NGOs⁹ as they do not provide accurate information on the use of pesticides and their reductions.

4. Eco-schemes and AECMs are doing too little to achieve a sustainable and reduced use of pesticides in the EU

The data shows that many farmers in the EU still heavily rely on chemical pesticides. Yet, according to the Commission, the *“new CAP can financially support farmers to reduce this dependency on chemical pesticides, by shifting to better agronomic practices, alternative pest control techniques and precision farming.”* The common instruments under the new CAP which should in theory promote organic farming, IPM and biological control are eco-schemes and AECMs (among others).¹⁰

4.1. Proposed eco-schemes by 8 EU Member States

As laid down in Article 31 of the new CAP regulation, “actions for a sustainable and reduced use of pesticides, in particular pesticides that present a risk for human health or environment” represent one of the common areas of actions defined at EU level that “each eco-scheme shall in principle cover.”¹¹ In other words, eco-schemes could potentially support agricultural practices that require the sustainable use of pesticides.

Our [earlier assessment of 166 draft eco-schemes](#) shows that half of the eco-schemes targeted specifically at pesticides reduction are deemed of low quality or even deemed to amount to greenwashing by national experts.

Poland, for example, is planning a vaguely described eco-scheme for “integrated production” which is raising strong concerns.

8 - <https://www.organicseurope.bio/news/member-states-should-enhance-support-for-organic-farming-in-cap-strategic-plans-in-line-with-commissions-observations/>

9 - <https://www.organicseurope.bio/news/environmental-ngos-and-organic-movement-call-on-commission-to-develop-a-new-indicator-to-measure-progress-towards-the-farm-to-fork-pesticide-reduction-target/>

10 - https://ec.europa.eu/commission/presscorner/detail/en/fs_22_3693

11 - [Regulation \(EU\) 2021/2115 of the European Parliament and of the Council of 2 December 2021](#)

Latvia and Spain plan to introduce an eco-scheme for “conservation agriculture” which pays farmers for no-till practices. Those schemes are problematic because they don’t include rules regarding herbicides and pesticides use (e.g., no limits on the use of phytosanitary products) and could potentially lead to increases in herbicides, as this is the most common alternative strategy to mechanical weed suppression. In **Latvia** for instance, the proposed eco-schemes related to pesticide reduction might not result in significant improvements as they just focus on basic planning and improved reporting activities.

On the other hand, **Germany** proposes a good eco-scheme which aims to limit the use of all pesticides in certain cultures. More specifically, the application of pesticides on legumes, corn, summer cereals, summer canola, vegetables, sugar beet and potatoes is prohibited between January and August. Moreover, applications of pesticides for permanent crops are not allowed from January 1st until November 15th.

While **Slovakia** does not offer a specific eco-scheme aiming at the reduction of pesticides, some elements of the whole-farm eco-scheme could be beneficial, such as non-productive elements and areas on arable land, and grassy strips in permanent crops since the use of pesticides in those areas is prohibited.

Although there are no eco-schemes that pay for the reduction of pesticide use in **Italy**, some interventions provide useful practices, such as the introduction of crop rotations with legumes (the use of chemical herbicides and other plant protection products is not permitted on these areas and throughout the year) and the establishment of pollinator-friendly flower belts where pesticide use is banned. On the contrary, the eco-scheme on greening of permanent crops requires farmers to limit the use of pesticides but without setting targets or indicators and thus very little or no actual benefit.

Lastly, **Latvia, Poland and Sweden** are planning an eco-scheme for organic farming which is generally welcomed and can potentially contribute to reduction in agrochemicals.

4.2. Proposed agri-environment-climate measures by 8 EU Member States

Unlike the eco-schemes, which are a novel instrument introduced by the recent CAP reform, agri-environment schemes have been a mandatory part of national rural development plans for three decades. Despite their long history, there is very little information on how AECMs have contributed to supporting farmers on the path to lowering pesticides use and transition to agro-ecology during the previous programming period. In their position paper from 2018, PAN Europe concluded on the new CAP: *“All too often, the current measures within rural development that Member States activate to encourage pesticide use reductions seem overly bureaucratic, or focusing on one method, therefore by nature lacking dynamism. As a result, these schemes are not capable of integrating new non-chemical alternatives*

into the systems in the short term, nor are they able to support farmers effectively in their transition towards the uptake of alternatives and the development of organic production systems.”¹²

The SUD requires farmers to apply eight principles of IPM and to move towards alternative approaches and techniques to reduce their dependence on pesticides. However, as Member States failed to identify mandatory and voluntary aspects of IPM, there is a mishmash in its implementation hindering any meaningful progress. Disappointingly, it appears that the new generation of CSPs is not going to change that.

Several Member States put in place AECMs supporting integrated production, including integrated pest management (mostly for permanent crops such as orchards, vineyards and horticulture). In **Italy**, farmers can get support under the scheme Greening permanent crops, which includes a total ban on the use of chemical pesticides and an obligation to sow grass between the rows of trees. **Slovakia** put in place the scheme *Sustainable farming on arable land, orchards and vineyards*, which includes several alternatives. The most demanding option, *Management on arable land without chemical input*, bans the use of chemical inputs (some biological ones are allowed). The option for vegetable, potatoes and strawberries bans the use of certain active substances that are listed and puts limits on the use of other chemicals. Nonetheless, this is problematic since no pesticides reduction target is set and compliance will be difficult to control. The **Czech Republic** also plans to offer farmers a scheme between the rows in orchards supporting *Integrated production* that includes a ban on the use of listed chemicals. It is positive that in both Slovak and Czechia's schemes beneficiaries are obliged to test soil for heavy metals and fruits for residues of pesticides. **Spain's** scheme

for *Integrated production* should be strengthened by including a requirement to support auxiliary fauna as part of IPM.

Spain also put in place a scheme supporting *Alternative to chemicals*. However, as it does not include a complete ban on the use of chemical pesticides but only requires their limitation, its effectiveness is questionable. Similarly, **Spain's** scheme supporting Sustainable crops includes commitments such as crop rotation or the use of green cover which fails to go beyond what is already required in the baseline. **Italy's** scheme on *Reducing pesticides use* obligates farmers to reduce the use of pesticides by 50% and to substitute certain active substances by less harmful ones; however, it is not designed well enough to be effective.

12 - https://www.pan-europe.info/sites/pan-europe.info/files/PositionPaper_CAP_post2020_final_pdf.pdf

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Moreover, there are schemes for which to be eligible, farmers have to comply with some, often vague standards set in national/regional legislation and register some of their agronomical operations. The scheme for *Integrated pest management* in **Italy** or *Green horticulture* in **Latvia** are examples of such schemes with very questionable effect on pesticides reduction or other environmental benefits.

Sweden, through the scheme *Protection zones*, aims to protect water resources by banning use of pesticides and fertilisers in specified areas. The **Czech Republic** will also implement a scheme, *Limiting use of pesticides on arable in water sources protection zones*, by limiting the use of certain active substances and limiting ban on others. The question is whether protection of water sources should not be ensured by setting an ambitious baseline for direct payments(see also chapter 2.1 on GAEC4).

Several Member States put in place AECM supporting organic farming, which are an important component of efforts towards agriculture without synthetic pesticides. Those include the **Czech Republic, Latvia, Slovakia and Sweden**.

In parallel with schemes supporting the reduction or elimination of pesticides use in the agricultural production process, it is critical that MS put in place schemes that support the creation of non-productive areas without pesticides use, as those provide multiple environmental benefits (soil, water, biodiversity). **Poland** is planning to grant AECM support for the creation of perennial flower strips on arable land without the use of pesticides. This will create important habitats for pollinators and birds and should lead to the reduction of pesticides used on the farm. The problem is that this scheme has a very low target area (2660ha) and low budget (2 391 011 EUR for 2023-2029), so it is unlikely that it will make a substantial difference on the ground. **Germany** also plans several AECMs supporting farmers to not apply pesticides but instead to invest in practices like buffer strips next to rivers, extensive agriculture and flower strips. The **Czech Republic** and **Latvia** will also support the creation of green/flowering strips without the use of pesticides.

5. Precision farming

Precision farming is heavily promoted by agro-chemical companies and many agricultural authorities on the premise that more precise use of agricultural inputs can reduce their use while maintaining the same productivity. Yet, so far this concept has shown little improvements on the agrichemicals use, as it has been seen as a way of continuing to fund the same type of practices with no substantial



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changes thereof. Moreover, precision farming implies more investments for new machinery and devices for farmers, many of whom are already plagued by debt and struggling with high input costs to maintain high yields.

In the assessed CAP strategic plans, precision farming will be funded through rural development investments in equipment (mainly), AECMs, or eco-schemes. However, it is very difficult to have a concrete overview of the share of the budget that would go to this practice, as the money may come from several interventions and is part of budgets that are not only aimed at precision farming. For example, in the **Polish** plan, precision farming would be supported within the framework of the Development of Agricultural and Forestry Services. In **Spain**, some Autonomous Communities propose a “variable dosage” AECM that includes precision agriculture. There are even some Autonomous Communities that boost the aid for investments in entities with a subsidised loan that can be increased by an additional 10%, when the investment is intended for precision agriculture.

As explained above, some MS have decided to consider precision farming as an AECM without clearly setting out the allocated budget. This is the case for the **Italian**, **Spanish** and **German** plans. Nevertheless, precision farming cannot be considered as a direct intervention for climate and environment, especially when it's only used to purchase equipment and is not included in a whole re-thinking of farming techniques that involves nature-based pest management, diversification and other nature friendly practices with clear reduction targets. Thus, accounting these spendings as money for the environment would be misleading.

Both **Slovakia** and the **Czech Republic** are planning eco-schemes for precision-farming, however, only targeting the reduction in fertiliser use. In **Sweden**, the eco-scheme for precision farming covers requirements such as the use of nutrient balance tools, performing soil mapping, establishing grass cover 2 m around drainage waterholes, doing manure analysis, etc. However, there are no commitments to reducing the use of fertilisers and pesticides over time, or to achieving the reduction of nutrient losses. Without any benchmarks or requirements for actual input reductions for fertiliser and pesticides, the environmental benefits of these schemes remain rather uncertain.

Finally, soft measures like training, information and investing in improved pesticide equipment that would reduce GHG emissions and allow farmers to become more energy-efficient and reduce the use of agrochemicals, are examples of the many measures that can help deliver on climate and biodiversity. However, those measures must be underpinned by ambitious, result-based and binding targets and must be embedded in holistic approaches to nutrients and pest management.

6. Conclusions and recommendations

The EU committed to halving the use and risk of chemical pesticides by setting a target in several of its Green Deal initiatives. The implementation of this target should be operationalised by the recently published Regulation on the Sustainable Use of Plant Protection Products, which will define modalities for setting the national targets. According to the Commission, the cost of obligations arising from implementing these targets should be covered by CAP.

When effectively implemented, IPM measures can support farmers to work with nature, meaning that pesticides are only used as the last resort. It is urgent to build back biodiversity in the farm landscapes and to devote 10% to agro-ecological infrastructures. With lacking EU-wide data on PPP use, it is paramount to develop better risk indicators and ensure targeted monitoring of the risk and impact of PPP use. The Commission should take increased action to collect data on “how, when and where” pesticides are used - and ensure public availability of those statistics - to substantially reduce pesticide use in the EU.

This thematic brief shows that Member States' CAP strategic plans will neither contribute to the uptake of IPM principles nor propose strong enough measures to seriously reducing pesticide use dependency, even though it is already required by EU law and has been promised by the Commission since the publication of the Farm to Fork Strategy in May 2020. Overall, MS demonstrates very low ambition to use CAP funding for interventions related to pesticides use reduction. Therefore, it is crucial to ensure that CAP funding is targeted to pay the agricultural sector to reduce pesticide use.

Our analysis, looking at CAP strategic plans in 8 Member States, shows that:

- » An inadequate EU framework for conditionality and flexibilities for Member States for the implementation resulted in a weak baseline;
- » The quantitative targets set by Member States show very low ambition for taking action aiming at reduction of pesticides use (more that $\frac{1}{3}$ of countries set the target lower than 10%). At the same time there is no assurance that the schemes included under the targets will really deliver;
- » The schemes supporting a genuine shift to agro-ecological practices as a full package are missing; only few schemes supporting complete elimination of chemical pesticides and/or supporting alternatives were identified;
- » The delivery of schemes supporting integrated production is questionable; in most cases they refer to compliance with national/regional IPM rules and give absolutely no guarantee that they will result in pesticides reduction.

Measures the CAP strategic plans must include:

- » Only schemes that have clear pesticides reduction targets (in accordance with the national target reduction as required by the Sustainable use of Plant Protection Products Regulation) should be counted under indicator R.24;
- » Schemes that promote transition to agroecological practices and farming should be reinforced and massively scaled up;
- » Schemes should be result driven and those that do not bring measurable change on the ground (such as compliance with national legislation, and keeping registers) should not be supported by public money;
- » Any data stemming from the testing of soils (e.g., for heavy metals) and fruits (e.g., residues of pesticides) as part of the framework of AECM or eco-schemes implementation should be collected by the EC in a systematic way and made public.

GLOSSARY:

AECM: agri-environment-climate measure/commitment (article 70 of CAP strategic plans regulation)

CAP: Common Agricultural Policy

CSP: CAP Strategic Plan

ECA: European Court of Auditors

GAEC standards: good agricultural and environmental conditions of land, part of CAP conditionality

IPM: integrated pest management

MS: Member States

PPP: plant protection product

SMR: statutory management requirements, part of CAP conditionality

SUD: The Sustainable Use of Pesticides Directive

ANNEX

1. Overview of agri-environment commitments aiming to reduce pesticide use and risk in production

Please note that the support for organic farming is not included.

Country	Name of the scheme (target area/total budget)	Key requirements	Comment
Czech Republic	Integrated production Target area: 217 676,50 ha Total budget: 104 259 062 EUR	Specific requirements for orchards, vineyards and vegetable/strawberries/potatoes; The conditions include: <ul style="list-style-type: none"> Ban on the use of listed active substances. Limits on the number of uses of herbicides. Ban on herbicides between the rows in orchards and vineyards. Ban on pesticides between the rows in the orchards. Analysis of soils for heavy metals and fruits for heavy metals and pesticides residues 	Greenwashing: <ul style="list-style-type: none"> The list of banned active substances is not known. The limits for the use of herbicides are very high. Measures for supporting functional biodiversity are missing.
Czech Republic	Limiting use of pesticides on arable land in water sources protection zones Target area: 100,000 ha Total budget: 15 100 000 EUR	<ul style="list-style-type: none"> Limits on the use of certain active substances (eg. glyphosate, bentazon, pethoxamid). Ban on the use of certain active substances. 	Greenwashing: <ul style="list-style-type: none"> The long list of allowed substances (despite limits on their use) makes the effectiveness of this scheme questionable.
Italy	Integrated production (ACA 1) Target area: 1,753,031, ha Total budget: 408,063,670 EUR	<ul style="list-style-type: none"> Compliance with national law and standards related to integrated production. Keeping register of agronomic operations (including use of fertilisers and pesticides). 	Greenwashing: <ul style="list-style-type: none"> National rules are less restrictive than regional ones and also provide for the possibility of using herbicides.
Italy	Greening permanent crops (ACA 5) Target area: 1,094,577 ha Total budget: 57,336,086 EUR	<ul style="list-style-type: none"> The scheme targets orchards Ban on the use of chemicals and tillage The control of turf vegetation can be carried out Manual or mechanical interventions Sowing of grass or spontaneous grassing to be allowed over the entire area 	OK, likely to deliver: <ul style="list-style-type: none"> This intervention (unlike the Eco-scheme) includes a ban on chemical herbicides, which is welcome.

Italy	Reducing pesticides use (ACA 19) Target area: 33,327 ha Total budget: 7,757,948 ha	Action 1: aims for reduction of drift from pesticides by 50% by application of the rules in the Guidance Document "Risk mitigation measures for the reduction of contamination of surface water bodies by drift and runoff". Action 2: limits on the maximum use of certain pesticides.	Greenwashing : <ul style="list-style-type: none"> -The number of allowed treatments is too high, so unlikely to result in adequate pesticide reduction.
Latvia	Green horticulture Target area: 38, 800 ha Total budget: 7,609,226 ha	<ul style="list-style-type: none"> Compliance with national rules related to integrated production. For each eligible crop the required data should be logged into the central electronic database. Take part in the relevant training. 	Greenwashing: <ul style="list-style-type: none"> It is more a top-up payment for local fruit and vegetable producers, rather than a measure contributing to reducing the dependence on pesticides as it does not go beyond the requirements of integrated production.
Slovakia	Sustainable farming on arable land, in orchards and vineyards 4 sub-operations: 1. Farming on arable land without use of chemical inputs 2. Sustainable methods in growing vegetables, potatoes and strawberries 3. Sustainable methods in orchards 4. Sustainable methods in vineyards Target area: 170 250 ha Total budget: 63 951 007 EUR	In case of operation 1: <ul style="list-style-type: none"> Ban on the use of all chemical pesticides. Ban on the use of mineral nitrate fertilisers. In case of operation 2,3,4: <ul style="list-style-type: none"> Ban on the use of listed active substances. Priority for biological substances, obligation to replace on dose with substances allowed in organic farming. In case of orchards: ban on using chemicals between the rows and obligation to ensure green cover, including plants for pollinators. Limits on the max number of doses applied in vineyards. Obligation to test soils for heavy metals, and fruits for residues of pesticides. 	Needs improvement: Operation 1 involving a total ban of chemical pesticides can be effective, but as the budget and target area is for the package, it is not clear on how much area it will be applied. It is welcome that the scheme in orchards includes measures supporting pollinators. Obligation for testing of soil and fruits is also positive. On that note, it is important to make this data available to the public.

Spain	Integrated production (6501.1) Target area: unknown Total budget: unknown	<ul style="list-style-type: none"> Compliance with the relevant (regional) standards for integrated production. Need for certification through an accredited body. 	Needs improvement: <ul style="list-style-type: none"> It should increase the requirement of SMR 8 (SUD), focusing its efforts on the use of auxiliary fauna as part of the Integrated Pest Management (although IPM is not included in SMR 8).
Spain	Sustainable crops (6501.2) Target area: 1,520,736 ha Total budget: 40,525,753 EUR	<ul style="list-style-type: none"> Practices should include crop rotation, green covers, use of compost, limitations on the use of fertiliser and irrigation – details set per region. Some limits on the use of chemical pesticides. 	Greenwashing: <ul style="list-style-type: none"> The measure includes commitments such as crop rotation or the use of green covers, already contemplated in the reinforced conditionality and in the eco-schemes. It should raise the level of ambition (to avoid double financing and the expected environmental objectives) establishing as access criteria, for example, the verifiable reduction of fertilisers and phytosanitary products.
Spain	Alternatives to chemicals use (6501.7) Target area: 389,608 ha Total budget: 29,426,951 EUR	<ul style="list-style-type: none"> Supporting alternative techniques to chemical control used to fight pests and diseases, such as biological control and technological solutions. Details set per region and can include: Release predators and/or parasitoids and/or pollinators, solarisation, establishment of field margins to support functional biodiversity etc. 	Needs improvement: <ul style="list-style-type: none"> If the use of pesticides and other polluting substances is only limited but not avoided, there is still emission of these products into the atmosphere, water, and food. Therefore, the use of pesticides and other polluting substances should be avoided through more sustainable agricultural practices. If this is not possible, establish strict environmental and climatic criteria for its application.

Sweden	Protection zones Target area: 58,000 ha Total budget: 25,107,527 EUR	<ul style="list-style-type: none"> • No pesticides or fertilisers are allowed at the protection zone. • Must be sown with grass or grass in a mixture with grass legumes. Insect-promoting seed mixtures may be mixed into the seed when sowing the protection zone. • Min 6 metres, max 10 metres • The land must be within a nitrate-sensitive area. 	Needs improvement: <ul style="list-style-type: none"> • There are no requirements for reduction of pesticides and fertilisers on the rest of the field, which limits the effectiveness of efforts to protect water sources against the run off.
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