

# **STUDY SUPPORTING THE EVALUATION OF DIRECTIVE 2009/128/EC ON THE SUSTAINABLE USE OF PESTICIDES AND IMPACT ASSESSMENT OF ITS POSSIBLE REVISION**

## **VALIDATION WORKSHOP**

# WELCOME!!

## HOUSEKEEPING

- Please mute your microphones and cameras, unless you are speaking.
- You can write questions and comments in the chat.
- If you want to speak, please raise your hand or write a message in the chat
- Please keep any spoken intervention to the point and short.



# AGENDA FOR THE WORKSHOP

01

Background and purpose

02

Study progress to date

03

Preliminary findings of the evaluation

04

Next steps in the Study

05

Questions & Answers

06

Closing remark



# PURPOSE OF THE WORKSHOP

- To present **preliminary findings** of the **evaluation part** of the Study
- To **test and validate** the logic and **interpretation** of findings
- To **gather input from stakeholders** on **additional potential data sources and evidence available** to support the evaluation and impact assessment
- To **keep stakeholders informed** of the progress of the Study and further steps in the workplan



**IS THE STUDY ON TRACK?**

# EVALUATION

## Objective

To determine whether the Directive has been performing as intended, what has worked and what has not, and **why?**

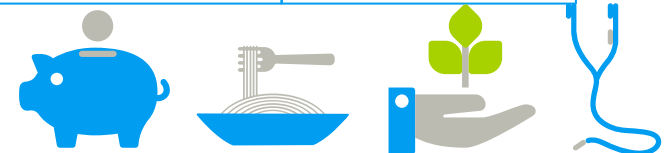
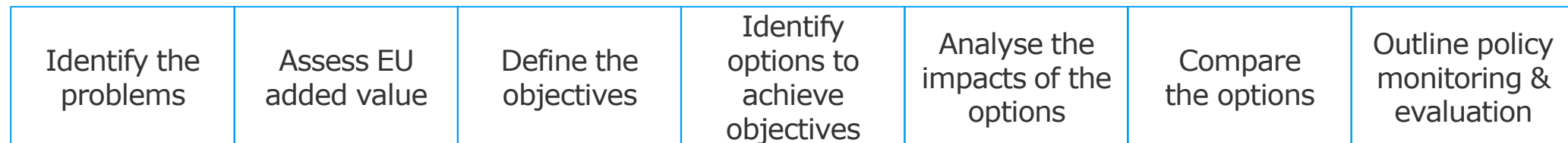
## Evaluation criteria

Effectiveness, efficiency, relevance, coherence, complementary, and EU added value

# IMPACT ASSESSMENT

## Objective

To provide information on potential revisions to the SUD and the corresponding environmental, social and economic impacts.



# DATA COLLECTION - EVALUATION PART

- Desk review and secondary sources (reports, audits, research, studies...)
- Interviews with stakeholders at EU and national levels:

Stakeholder category	Number of interviews
National competent authorities	13
European institutions	9
Professional organisations representing pesticide users	6
Professional organisations representing pesticide producers and distributors	2
Professional organisations representing other industries impacted by SUD, including organic agriculture	11
Non-governmental organisations	4
Consumer and workers organisations	2
International organisation	1

- In total 53 interviews have been conducted with in total 82 persons

# PRESENTATION OF PRELIMINARY FINDINGS - EVALUATION

- We are presenting the **preliminary** findings of the evaluation part
- The presentation will focus mainly on **effectiveness** and **efficiency** of the SUD, as the two more difficult criteria to answer due to a lack of “hard evidence”
- Other evaluation criteria, relevance, coherence and EU added value, have fairly consistent findings across stakeholder groups
- After each criteria is presented, opportunity to answer whether agree and add comments on **[www.menti.com](https://www.menti.com) CODE 75 71 48 37**
- All answers and input will be anonymous

# EVALUATION QUESTIONS - RELEVANCE

- To what extent has the SUD responded to the needs and problems concerning the use of pesticides identified at the time of the Impact Assessment?
- How have the needs and problems identified at the time of preparation of the SUD evolved since then? What are the current needs and problems related to the use of pesticides and how will they evolve (e.g. health risks to children and the most vulnerable, key environmental aspects such as soil health, biodiversity etc.)?
- To what extent are the SUD's objectives and required actions relevant today to address the current needs and problems and expected developments related to the use of pesticides in the EU?
- Based on the identified current needs and problems and expected developments, are the objectives of the SUD relevant to address the three main dimensions of sustainability, i.e. social, economic and environmental?



# EVALUATION CRITERION - RELEVANCE

**Preliminary conclusion:** The objectives and actions of the **SUD remain highly relevant**. Developments since adoption has further underlined the relevance of the legislation regulating the use phase of pesticides in the EU.

## Evidence from literature review

- Studies provide evidence for decline in biodiversity in agricultural and non-agricultural areas
- EU strategies such as Farm-to-Fork, Biodiversity or Pollinator Initiative increase political commitment to protecting human health and the environment

## Evidence from consultations

- Broad agreement across stakeholders on the continued relevance of the SUD
- Public awareness has strongly increased, showing concerns about unsustainable food production
- Further development of viable alternatives to pesticides is needed
- The ban on spraying from drones is seen as an issue hindering technological development

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# EVALUATION QUESTIONS - EFFECTIVENESS

- To what extent have the actions envisaged by the SUD contributed to achieving its objectives?
- Are the currently available pesticide statistics sufficient to monitor effectively the progress on the sustainable use of pesticides?
- How do the achieved results and impacts compare with the expected ones?
- Which were the key contributing and hindering factors in achieving the intended objectives?

# PRELIMINARY FINDINGS – EFFECTIVENESS

**Preliminary conclusion:** Evidence shows Member States have taken action to implement the SUD, however positive effects in terms of risk reduction and reduction of dependency cannot be established with the data available currently.

## Evidence from literature review

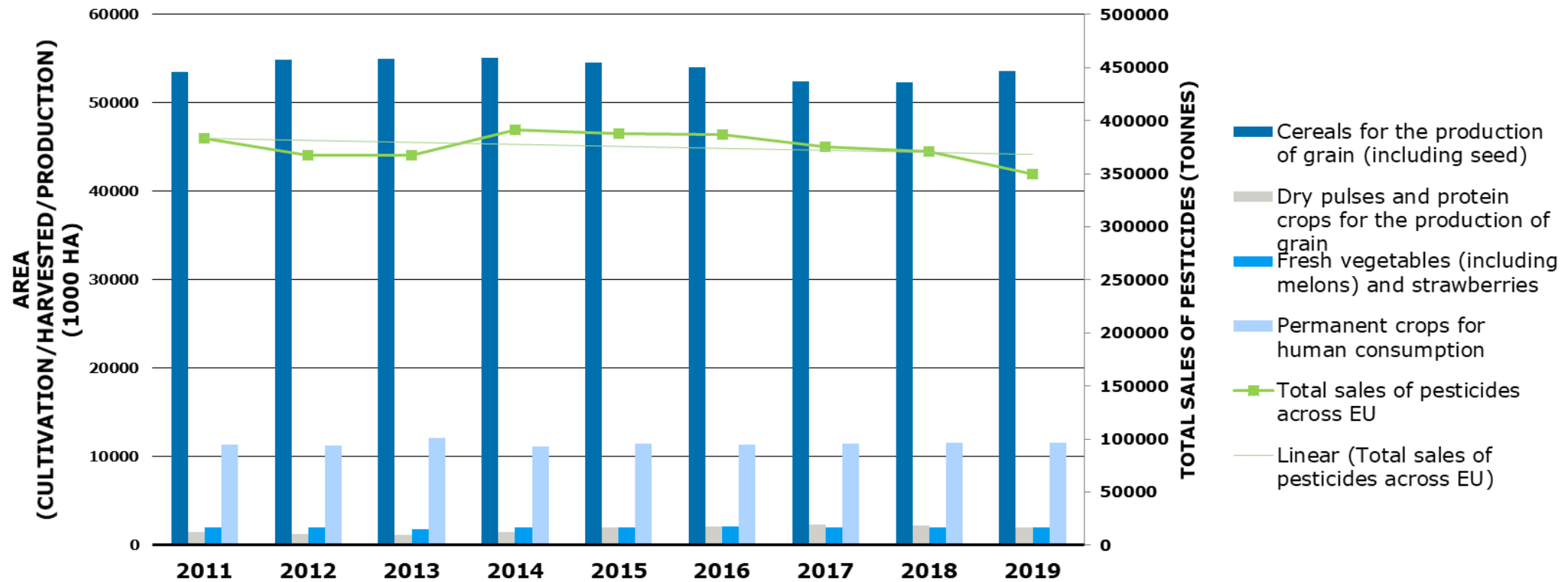
- Differences in the quality and availability of quantitative and qualitative data indicators (i.e. sales data, HRI's, MRL levels) limits the ability to definitely state the effectiveness of the SUD on the ground. Examples of trends:
  - HRI 1 has decreased by 20% (2011-2018)
  - HRI 2 has increased by 50% (2011-2018)
  - Sales of pesticides has broadly decreased
  - MRL exceedance rates across the EU has increased (2008-2019)

## Evidence from consultations

- Difficulty in assessing a reduction of risk caused by the SUD based on sales data as it could be attributed to other pieces of EU legislation or existing national initiatives that were in operation prior to the SUD
- There was broad agreement that the SUD had an effect on improving the accuracy of pesticide application equipment
- There were differences in opinion on the SUDs impact on improving the behaviour and practices of pesticide users

# PRELIMINARY FINDINGS – EFFECTIVENESS

**Preliminary conclusion:** Reduction of use of pesticides was not an objective of the SUD but most stakeholders assume this and for most provisions it was assumed that they would lead to a use reduction. Sales data does not suggest that this was achieved.





# PRELIMINARY FINDINGS – EFFECTIVENESS

**Preliminary conclusion:** The aim of being able to monitor progress achieved and review actions accordingly is not being achieved because data on sales and use has shortcomings.

**Quote from the Impact Assessment:** *For the assessment of the sustainability of PPP use and the effects of the Thematic Strategy, the "real use" data at farm level are of crucial importance.*

## Evidence from literature review

- Use and sales data not collected in a satisfactory format for policy making

## Evidence from consultations

- This was raised by the majority of interviewed stakeholders, which emphasised the lack of measurements and the issues on reporting data on pesticide risk and use and its effects on human health and the environment

# PRELIMINARY FINDINGS – EFFECTIVENESS

**Preliminary conclusion:** The level of implementation of IPM is disputed, however the main hindering factor was in measuring the true implementation on the ground due to a lack of monitoring data.

## Evidence from literature review

- The original Impact Assessment suggested that IPM would lead to a use reduction ranging from 22,000 to 31,000 tons of active substances – this is not currently possible to assess due to lack of data.
- Scientific literature reiterated the main problems of IPM, emphasising the complexities in capturing the different levels of IPM practiced at the farm scale.

## Evidence from consultations

- Existing national practices can make it difficult to distinguish the effect of IPM.
- There was agreement that IPM guidelines were well developed and accepted by many users, however there was a lack of publicity.
- Further promotion of IPM was suggested through increasing peer to peer learning among farmers and encouraging demonstration farms.

# PRELIMINARY FINDINGS – EFFECTIVENESS

**Preliminary conclusion:** Factors at the different levels hinder the full achievement of the objectives of the SUD, main emerging factors were lack of implementation and enforcement.

## Evidence from literature review

- The SUD's provisions (e.g. IPM) are only weakly enforced at both national level and from EU towards Member States
- As a result, the implementation and level of ambition varies substantially between Member States

## Evidence from consultations

- Agreement that the form of a Directive did not hinder the SUD's ability to achieve its intended objectives
- Agreement across stakeholders that the lack of implementation has hindered the effectiveness of the SUD.
- The lack of monitoring data has made it difficult to assess the effectiveness of the SUD
- The lack of viable alternatives to chemical pesticides was raised as one of the main issues hindering the SUDs implementation

# QUESTIONS TO AUDIENCE – EFFECTIVENESS

- Questions to audience on menti:
  - Agree/disagree with [effectiveness preliminary conclusions](#)
  - Comments to [effectiveness preliminary conclusions](#)
- **Please inform us of any data you** are aware of that can be useful to the study (through Menti or through a mail **SUD\_study@ramboll.com**)

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# EVALUATION QUESTIONS – EFFICIENCY

- Which elements of the SUD pose an administrative burden or are overly complex? What are the administrative costs for the different actors?
- What have been the main costs to implement the SUD for the different actors concerned? What were the factors driving these costs?
- What social, environmental and economic benefits has the SUD achieved and what is the corresponding monetised value, where possible and relevant to estimate?
- To what extent were the SUD's costs proportionate to its benefits (i.e. positive outcomes)?
- What have been the costs of partially meeting or not meeting some of the objectives and requirements of the SUD?



# PRELIMINARY FINDINGS – EFFICIENCY

**Preliminary conclusion 1:** There does not seem to be a part of the current SUD which is overly burdensome or costly.

## Evidence from literature review

- Many provisions have already been in place in several MS, making it less costly to implement
- Prior evaluation also found no evidence for overly high administrative burden created by SUD

## Evidence from consultations

- No provision of the SUD was brought up by more than one stakeholder as being overly costly.
- Examples which were brought up by single stakeholders include:
  - Requesting and processing derogations from the ban of aerial spraying
  - Uncertainty whether drones constitute aerial spraying

# PRELIMINARY FINDINGS – EFFICIENCY

**Preliminary conclusion 2:** Farmers seem to bear many of the direct costs (through fees) and risks (loss of yield) while they do not have many direct economic benefits.

## Evidence from literature review

- Assumptions and calculations in the impact assessment
- Data on sales of pesticides and on volume of agricultural output

## Evidence from consultations

- [Cost assessment through survey still pending]

# PRELIMINARY FINDINGS – EFFICIENCY

**Preliminary conclusion 3:** There is still very little aggregated evidence on the environmental and social benefits of reducing risks from pesticide use, making it very difficult/impossible to analyse and compare costs and benefits.

## Evidence from literature review

- Most literature highlights methodological challenges and provides, if any, local and contextual data
- One available study (European Commission (2017): Study on the cumulative health and environmental benefits of chemical legislation) estimates the current annual human health and environmental benefits of EU pesticide regulation may be between 15 – 54 billion EUR, equating to between 70 EUR and 250 EUR per EU household

## Evidence from consultations

- Stakeholders agree that it is a challenge to measure benefits

# QUESTIONS TO AUDIENCE – EFFICIENCY

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  - Comments to efficiency [preliminary conclusions](#)
  - **Please inform us of on any data** you are aware of that can be useful to the study. (through Menti or through a mail **SUD\_study@ramboll.com**)
    - Any data on costs (implementation costs, staff time in preparing, revising and implementing Member States' national action plans, training and certification for advisers, distributors and users of pesticides etc.)
    - Data on IPM research funding in Member States
    - National data on poisoning incidents
    - Data on national compensation payments to farmers due to implantation of IPM

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# NEXT CONSULTATION STEPS IN THE STUDY

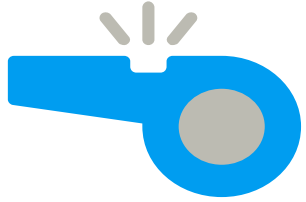


## Targeted survey

- To different stakeholder groups
  - To be sent out week 20
1. National competent authorities
  2. Distributors and sellers of pesticides
  3. Professional organisations representing agricultural users of pesticides/organic agriculture
  4. Professional organisations representing other non-agricultural pesticide users, food and other relevant industries, including employer and employee representative organisations
  5. Non-governmental and non-profit organisations
  6. Consumer organisations



# THE FORESIGHT STUDY



Please take note of the foresight study, which will run in parallel with the back-to-back evaluation and impact assessment!

## Foresight study on sustainable use of pesticides

- Supports the EC with the development of a robust policy trajectory until 2030 with the following goals:
  - Achievement of pesticide use and risk reduction targets;
  - Protection of food security, food production and food quality, as well as economic well-being of agricultural producers in the EU.
- Methods:
  - Evidence review
  - **Expert survey / stakeholder engagement**
  - Structured scenario development
  - Policy analysis
- Timeline: April – September 2021
- Partners:



# HOW TO PROVIDE INPUT, FEEDBACK, IDEAS...

- You can reach the team through sending an email to **SUD\_study@ramboll.com**
- The project team will do our best to answer questions and requests for information from stakeholders.



Bright ideas. Sustainable change.

