



**Pesticide
Action
Network**
Europe

**Alternatives for
candidates do exist.**

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To: Ms. Kyriakides
European Commissioner for Health and Consumer Policy
European Commission
B-1049 Brussels.

Concerning: Misleading information on the alternatives for candidates for substitution.

Dear Ms. Health Commissioner Kyriakides,

We are writing to you concerning the issue of substitution of the most dangerous pesticides authorised in the EU, the candidates of substitution (CfS). More specifically, we would like to bring to your attention new research from Wageningen University (attached), which concluded that numerous alternative pesticide products containing candidates of substitution (CfS) are available in The Netherlands. The study's outcome is in flagrant contradiction with what many Member States including the Dutch authorities (Ctgb and Ministry of Agriculture) replied in the context of the REFIT program¹ and in the most recent survey on comparative assessment by the Commission (also attached). Indeed, on page 5 of the survey's questionnaire, the Dutch ministry claims that the biggest difficulty in substituting candidates for substitution is the "*Lack of (sufficient) alternatives under all conditions*". Apparently, the ministry sent you this information based on pure speculation, while it had no data to support its claim.

The Wageningen impact study was commissioned by the same Dutch ministry following the adoption of a resolution by the Dutch parliament calling to reduce the use of candidates for substitution by 50% in 2025 and by 95% in 2030. The ministry was not happy with the outcome of the Wageningen research and for some months even considered not publishing the results.

In the research the 10 CfS with the highest use in the Netherlands² were evaluated for alternatives. According to the conclusions for the 53 pesticide/crop combinations, 20 combinations could be easily substituted by 2025. For a further 21 pesticide/crop combinations, some difficulties might arise because of a smaller pesticide package available, but alternatives are still present³. Only for 12 pesticide/crop combinations an

¹ [refit \(europa.eu\)](http://refit.europa.eu)

² Difenconazole pendimethalin aclonifen oxamyl metribuzin tebuconazole propyzamide fludioxonil fluopicolide and cyprodinil.

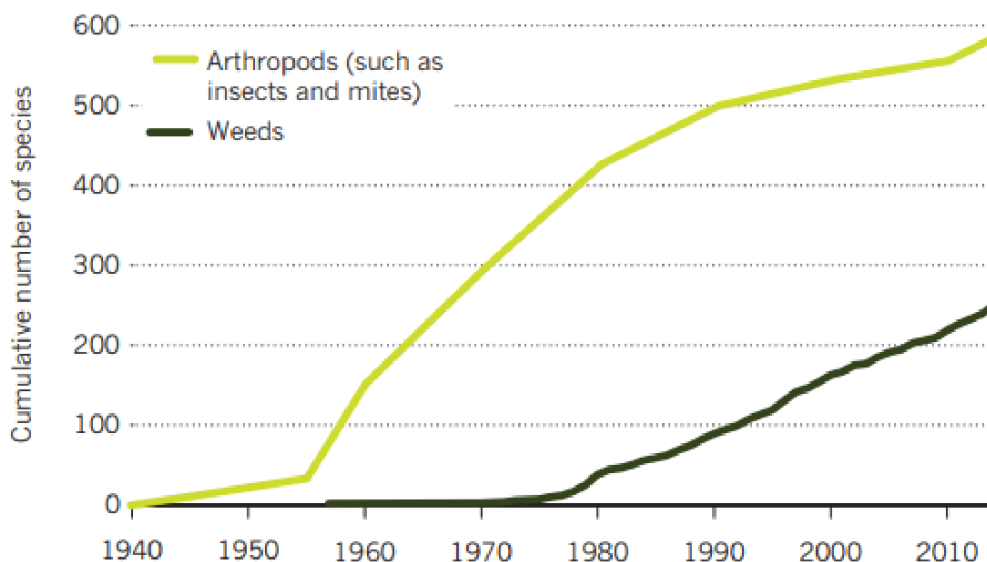
³ Definition small impact: "the available package of measures and resources becomes narrow, making it more difficult to control the said <diseases/pests/weeds> in an integrated cultivation system and/or the application of responsible resistance management becomes more difficult".

impact could be assessed⁴, meaning no substitution would be possible. For 2030 the assessment is a bit more pessimistic since it is assumed that some pesticides could be banned by the European Union and the pesticide package might be smaller.

In conclusion only 22,5% of the pesticide/crop combinations in a comparative assessment in the Netherlands currently have no adequate alternative. This is the case even while the outcome of Wageningen research has been based on the flawed EPPO-guideline^{5,6}. This guideline is due for revision since the policy on resistance does not actually minimize it as required by the Regulation⁷ but instead it promotes resistance (see Figure below⁸). Without this resistance policy the number of alternatives would even be higher.

THE RISE OF RESISTANCE

The number of pests (including insect and plant species) resistant to at least one form of synthetic pesticide has been steadily on the rise for decades, as has the cost of developing such chemicals.



This research therefore shows that CfS can be substituted in the Netherlands as in most cases an adequate alternative is available. We consider that if the same type of study was replicated in other Member States, it would be likely to reach similar conclusions. This would confirm that the repeated positions taken by several Member States on the substitution principle are purely based on policy and not on facts or research.

⁴ Definition big impact: “with the available package of measures and resources, the said <diseases/pests/weeds> can no longer be adequately controlled in an integrated cultivation system and/or the application of responsible resistance management is no longer possible”.

⁵ <https://pp1.eppo.int/standards/PP1-271-3>

⁶ [Pesticide Paradise: How industry and officials protected the most toxic pesticides from a policy push for sustainable farming | PAN Europe \(pan-europe.info\)](#)

⁷ Regulation 1107/2009, Art. 50.1.c to minimise the occurrence of resistance in the target organisms.

⁸ BROOKE BOREL, WHEN THE PESTICIDES RUN OUT, 302 | NATURE | VOL 543 | 16 MARCH 2017

In the Central zone committee⁹ several Member States including IE, PT, DE and NL stressed the loss of active substances as an important issue. They complain that their views about alternatives not being available is not heard by the Commission and that the fact that they authorise more pesticide products does not mean that farmers have more possibilities for plant protection. According to these Member States the need for new active substances and innovative techniques has to be stressed. These are quite serious policy positions which reflect a refusal by these Member States to apply the abundantly available Integrated Pest Management (IPM) methods and practices such as mechanical weeding and resistant crop varieties. This policy's stand is also in fierce contrast to the Regulation 1107/2009 and the Directive 2009/128 that aim to integrate agriculture and nature by IPM. Focussing on new active substances means simply that these Member States intend to continue the old habits of killing all natural elements with the unavoidable result of further collapsing ecosystems and biodiversity.

Therefore with this letter, we're asking you to discuss this Dutch research in the next ScoPAFF-meeting planned in late May and design a way forward for the substitution of CfS and for removing the policy obstructions. New active substances, even low risk actives, are designed to kill organisms and as long as non-chemical alternatives are not enforced by the Member States the halt of biodiversity decline remains an illusion. The resistance-paragraph in the current EPPO guideline is another element of the same 'kill-all' ideology and tries to keep the old paradigm of the war against nature in place.

We urge you to discuss substitution in the next ScoPAFF and propose to fully revise the EPPO guideline, deleting the flawed resistance approach¹⁰. We also propose that you announce that you will select to assess a number of comparative risk assessments in Member States, with the assistance of an independent research group, to check if the position of these MS that no alternatives are available is justified.

We hope for your support and your reaction,
Sincerely yours,
Hans Muilerman,
Pesticide Action Network, Brussels.

⁹ Minutes of the video conference 10 November 2020

¹⁰ [Proposals - Comparative Assessment - GD revision .docx \(pan-europe.info\)](#)