



**Communauté européenne des coopératives de consommateurs**  
**European community of consumer cooperatives**

**Euro Coop's Comments to the Commission's Communication "Towards a thematic strategy on the sustainable use of pesticides" (COM (2002) 349)**

*Euro Coop is the European Community of Consumer Co-operatives, whose members are the national organisations of consumer co-operatives in 11 of the 15 Member States of the EU and in 4 Central and Eastern European countries. Created in 1957, Euro Coop today represents over 3,200 local or regional co-operatives, membership of which amounts to over 19 million consumers in the EU and 2 million in the associated countries of Central and Eastern Europe.*

Euro Coop welcomes the European Commission's initiative to elaborate a strategy to complement the existing legislative framework by targeting the use-phase of plant protection products, in this way aiming to reduce the impact of pesticides on the environment, biodiversity and human health.

Euro Coop agrees with the five objectives in the Communication "Towards a thematic strategy on the sustainable use of pesticides" (COM (2002) 349), namely:

- To minimise the hazards and risks to health and environment from the use of pesticides.
- To improve controls on the use and distribution of pesticides.
- To reduce the levels of harmful active substances, in particular by replacing the most dangerous by safer (including non-chemical) alternatives.
- To encourage the use of low-input or pesticide-free crop farming.
- To establish a transparent system for reporting and monitoring progress including the development of appropriate indicators.

Euro Coop believes that it is important to link the strategy with other EU policies, particularly the Common Agricultural Policy (CAP), the new chemicals policy and the 6<sup>th</sup> Environmental Action Programme, in order for the strategy to have an effective impact in achieving sustainable development.

However, the question is what is meant by a sustainable use of pesticides. Euro Coop would not like to see the strategy becoming a blue-print to use pesticides where it is not necessary.

In the long term the strategy must focus on how to minimise the use of pesticides and to find out where it is not necessary to use pesticides, hence finding safer, including non chemical, alternatives.

In this respect, it becomes important to link the strategy to the revision of the Common Agricultural Policy (CAP) and in particular to the soon expected European Commission Action Plan on Organic Farming, in order to encourage the use of pesticide-free crop farming particularly by raising user's awareness, promoting the use of codes of good practices and to consider the possible application of financial instruments.

It is important that clear timetables and indicators are introduced in the strategy to monitor quantitative progress. Currently, there is no co-ordination in this area. Hence, Euro Coop believes that the establishment of national plans to reduce hazards, risks and dependence on chemical control would be a vital tool to achieve this. As well as, a review of available statistics and indicators.

This means that there should be a transparent system for reporting and monitoring any progress made, which would include a regular reporting on national risk reduction programmes and the development of suitable indicators for monitoring and definition of quantitative targets.

Furthermore, Euro Coop welcomes further research into the area of pesticides by the European Commission, the EU Member States and industry.

Euro Coop supports the Commission's proposal to improve the controls on the use and distribution of pesticides, particularly concerning the creation of a system of mandatory education, awareness raising, training and certification for all plant protection product users. The training should put emphasis on safe use, covering both human health and the environmental aspects.

However, Euro Coop would first of all like to see the link between the strategy and organic farming better described in the final strategy. As organic farming is an important tool to achieve the strategy's objectives.

Secondly, Euro Coop feels that the role and responsibilities of the various stakeholders are not properly addressed in the strategy. Clearly, the consumer is not mentioned at all.

The consumer, however, is the one choosing the product by the end of the day given the information provided to him/her. Therefore, information to the consumer via labelling, information brochures etc. becomes an important tool to promote sustainable consumption and development by giving the consumer the option to make an informed choice between products.

Here, consumer co-operatives clearly play a role being a link between the producers and its consumer members regarding information to and education of consumers. Euro Coop's member organisations are being active in this field and for instance, have a "code of practice" for producers on the pesticides that the producers may use with permission and what pesticides Euro Coop's member organisations have banned.

However, currently most consumer co-operatives bear the costs of controlling that the products fulfil the criteria. This means that consumer co-operatives are being punished economically for behaving responsible.

Euro Coop therefore calls on the Commission to address this problem in its strategy by making it the suppliers' and producers' responsibility to pay the costs.

Finally, Euro Coop would like to see a link made between the strategy and the follow-up to the Green Paper on Integrated Product Policy in order to have a true reflection of costs and therefore the final price of a product. At the moment, consumers have to pay more for a sustainable product than a non-sustainable one.

In reality, it means that some consumers are paying for that everybody achieves a better environment, which is in contradiction to the Polluter Pays Principle and not in line with "getting the prices right".

---

**For further information, contact:**

**Dónal WALSHE**, Secretary General

or

**Louise OUSTED OLSEN**, Senior Adviser

Tel.: +32.(0)2.285.00.76 Fax: +32.(0)2.231.07.57

E-mail: [Lousted\\_Olsen@eurocoop.org](mailto:Lousted_Olsen@eurocoop.org)

---