



**Call for expressions of interest
in joining IFOAM EU project**

Pesticide use and contamination:
ensuring a favourable environment for
organic operators through EU legislative
frameworks

May 2020

May 2020 edition of the project proposal.

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Pesticide contamination is a concern for farmers, citizens' health and the environment. By supporting our work, you will help us better advocate for a common approach of the organic sector. This will help how we, the organic sector, deal with residue findings and adopt safer agricultural methods.

Interested? Contact us now at supportus@ifoam-eu.org

1 Context

Pesticide use and contamination has become a major issue in the EU over the last few decades. In 2016 almost 400,000 tonnes of pesticides were sold in Europe, the majority used in the agricultural sector (Eurostat, 2018). Given the dominance of intensive agriculture that employs these substances, there is a substantial risk of contamination for farmers who do not use those substances and for the environment in general. This raises a significant problem for the organic sector, where their use is prohibited. Recent studies found that over 80% of tested soils contained pesticide residues (Silva et al., 2019). The current Organic Regulation (EC) No 834/2007 does not give clear directions on how to deal with residues of non-allowed substances in organic products, which makes the situation unclear and the harmonisation in the EU very difficult. According to the new Organic Regulation (EU) 2018/848, the European Commission shall present a report on the implementation of Article 29 on the presence of non-authorized products and substances by 31 December 2024. The report might be accompanied by a legislative proposal for further harmonisation in all EU Member States and Third Countries. **The EU might also push for setting an automatic decertification threshold for pesticide residues. As organic farming is a holistic process-oriented approach based on natural cycles, automatic decertification in case of residue findings would undermine its core principles defined by IFOAM.**

In the context of rapidly growing organic market and sector, **IFOAM EU is calling for cooperation. We want to agree on a common approach of the organic sector on how to deal with residue findings** before the Commission issues the report on implementation and a possible proposal on harmonisation. This project's goal is better harmonisation of the legislative framework to ensure a level playing field for organic farmers, processors, traders, processors, certifiers in the EU and beyond.

The total budget of this two-year project is €138,000. IFOAM EU is looking for partners that want to support this project and influence the policy discussions in the context of the new Organic Regulation (EU) 2018/848. **The project will only start if a minimum amount of €120,000 is collected by 15 March 2020.** It will be used to subcontract researchers to gather the data, finance advocacy work carried out by IFOAM EU office and cover direct costs related to the project, such as travels, meeting and staff responsible for project administration.

2 Why is it important to address the threshold level in the Organic Regulation?

2.1 Organic is a process-based approach

Pesticide contamination poses significant problems to the organic sector, where the use of synthetic pesticides is prohibited. It is also a challenge for non-organic farmers, processors and traders who want to grow, produce and sell pesticide-free food. The current Organic Regulation (EC) No 834/2007 and the new (EU) 2018/848 do not provide (yet) for full harmonization on how to deal with residues of non-allowed substances in organic products. This makes the situation unclear for the organic food and farming sector. However, by 31 December 2024, the European Commission shall present a report on the implementation of the Article 29 on the presence of non-authorized products and substances and on the assessment of the national rules. The report might be accompanied by a legislative proposal for further harmonisation in all Member States and Third Countries¹. One option is that an automatic decertification threshold will be imposed when pesticide residues are detected, using arguments of protecting organic consumers, preventing frauds and harmonising the implementation of the future legislative proposal. However, **this clashes with the definition and the principles of organic farming and production. Organic farming is a holistic, process-based approach. Shifting from a process-based approach to one based on the evaluation of the end products is counter-intuitive.** Organic labelling is based on the wholeness of a process which delivers valuable goods to the people and the environment – think about applying crop rotation, free range of animals and not using harmful substances. The products grown and created in such system should not be validated exclusively by analytical testing. Furthermore, an ‘end product’ approach threatens farmers that struggle to protect themselves from pesticide contamination. If it occurs, these farmers, whose production is fully in line with the organic principles and rules, risk liability for contamination caused by other farmers and/or by residues persisting in the environment. The same applies for organic processors and traders, where contamination can happen through transport or storage. In the case of products like oranges or berries, pesticides could be detected in a processed product like concentrated juice or essential oils, while they were not detected in the fresh products².

The above-mentioned automatic decertification threshold in organic raises the issue of legislative harmonisation. **Currently, Member States and even different control bodies in the same Member State apply different systems.** This is the case because the current Organic Regulation (EC) No 834/2007 and the future Organic Regulation (EU) 2018/848 do not provide rules for proper harmonisation for management of residues of non-allowed substances in organic products. Member States that have rules in place for decertifying organic products containing non-authorized substances above a certain level, may continue to apply these rules – if they do not prohibit, restrict or impede the placing on the market of products produced in other Member States.

Moreover, the way and the time when the sample is taken influences its results. Factors like the timing during the vegetation season/harvest time, type of product, different types of contaminants, testing systems chosen and laboratory carrying out the analyses all impact the results. **When finding pesticide residues in a given product, the decision about keeping the organic status of the products vary depending on country or control body.** Uncertainty behind analytical results could cause trust-related problems and cause legal issues and conflicts between operators and control bodies and supervision authorities. This is a potential obstacle for operators that consider conversion to organic and it weakens the position of small farmers who struggle to produce organically in contaminated environments.

Setting a maximum level for residues might seem the best and easiest solution for harmonising, but it is not the right answer. Other solutions have to be explored for a better harmonization. **Better harmonisation of the legislative framework will lead to a level playing field for organic operators, in all EU countries and Third**

¹ <https://eur-lex.europa.eu/eli/reg/2018/848/oj>

² This issue becomes complex in some Member states, such as Italy or Czech Republic where decertification threshold exists.

Countries. As organic has been and continues growing globally³, harmonisation will create a more favourable environment for operators wanting to convert to or start with organic.

2.2 Society needs safer agricultural methods for people and the planet

In the legislative framework regulating pesticide use, the [Sustainable Use of Pesticides Directive \(SUD\) 2009/128/EC](#), there is a lack of coherency with regard to indicators measuring chronic health aspects in EU Member States. This directive is problematic in assessing the impact of pesticides on overall human health and the environment. IFOAM EU is of an opinion that we need a more coherent evaluation of the implementation of the directive. We see the need for developing Harmonised Risk Indicators (HRI) to allow for a comparable and clear set of data and reliable progress evaluation at the European level. Further to that, **society needs to use alternative agricultural methods, which are safer for people and the environment**. This links to the organic movement's overall vision of a system of food production and consumption based on living ecological cycles, sustaining and enhancing soil health, and protecting the health and well-being of current and future generations.

³ In 2017, 1,4% of the world's agricultural land was organic. In the European Union 7,2% of agricultural land was organic. In Europe, the organic land grew by 1 million hectares in 2017 in comparison to 2016, which gives 7,6% increase. In: Willer et al. (2018).

3 What legislative changes do we want to achieve?

We want EU policies and regulations that ensure a level playing field and support for farmers, processors, retailers and traders producing food without the use of pesticides.

To achieve that, the project has four purposes:

1. Understanding the level of pesticide presence and contamination affecting food and farming sector, with a focus on organic, and the environment. This data will be published in reports.
2. Understanding how competent authorities, control bodies / authorities and organic operators are dealing with pesticide presence and contamination. Based on this we, the organic sector, will try to reach a common approach on dealing with pesticide residue findings before the Commission issues its report on implementation and a possible proposal on harmonisation.
3. Reaching a fair and harmonized legislative framework for the organic agri-food sector with harmonized procedures for operators, control bodies / authorities in case of residue findings.
4. Better integration of the IFOAM principles of organic farming into EU legislative frameworks ([Regulation \(EC\) No 1107/2009 on Plant Protection Products](#)) and stronger coherency of indicators in the framework of the application of the [Sustainable Use of Pesticides Directive \(SUD\) 2009/128/EC](#).

4 Timeline, activities and budget

The project will be divided in four components.

4.1 Obtaining knowledge on pesticide residues affecting the food and farming sector and the environment

A desk study leading into a scientific report on pesticide presence in the environment, including surface water, ground water, air, soil, and wild plants.

Data collection of pesticide residues present in the food and farming system, including organic. This will be based on a desk study of scientific literature and data collection. We will use data from producers, processors and traders (and associations of), control bodies/authorities, competent authorities, research institutes.

IFOAM EU will create synergies with and build on already existing initiatives carried out by other associations and federations.

4.2 Understanding how business and policymakers deal with residue findings

Understand how residue findings are managed in organic by competent authorities, control bodies, control authorities and businesses. To get this information we will perform qualitative research like interviews and surveys and gathered data from IFOAM EU members and other relevant actors.

1. Acquiring data from competent authorities, control bodies, control authorities and business including:
 - Methodology of on-site sampling in inspection during different stage of product cycle (pre-harvesting, harvesting, transportation, end-product on the market).
 - Evaluation of analytical results (depending on level and type of substance/mix of substances) and existing internal guidelines for evaluation.
 - Methodology of investigating residue cases. Specific cases that occurred in the past and procedures and measures taken for each of the cases.
2. Collecting cases of contamination amongst IFOAM EU's members, and mapping how different EU countries deal with such situations. The data collected under 1 & 2 will feed the position paper produced under the Component 3 and will provide background for IFOAM EU proposal on Organic Regulation regarding technical aspects of dealing with residue findings.

4.3 Advocating for harmonisation of the new EU Organic Regulation

Prepare evidence and carry out advocacy work to harmonise of the new EU Organic Regulation (EU) 2018/848 by:

1. Compiling main findings from the above studies and developing recommendations for harmonisation.
2. Develop a position paper on harmonisation together with key stakeholders and experts from the organic sector.
3. Present the proposal on harmonisation to the European Commission and the Member States.

4.4 Advocating for better inclusion of organic principles in the horizontal legislations concerning the authorisation and use of plant protection products

Carry out advocacy work towards better inclusion of organic principles in the Regulation concerning the authorisation of plant protection products (EC) [No 1107/2009](#) and for stronger harmonised risk indicators in the framework of the [Sustainable Use of Pesticides Directive \(SUD\) 2009/128/EC](#).

1. Review the implementation of the National Action Plans developed under Directive 2009/128/EC at Member State level and with particular regard to the control system and risks for health and the environment. Evaluation of the correct application of Plant Protection

Products according to labelling indications. The review and the evaluation will serve as a background to underpin advocacy activities under the tasks 2 and 3.

2. Using the report on residues present in the environment (produced under Task 4.1.) as well as contamination present in organic food and farming (produced under Tasks 4.1, 4.2), advocate for more ambitious National Action plans with quantifiable risk and use reduction targets of pesticides. The aim is a further development of Harmonised Risk Indicators (HRI) so that the implementation of the SUD in the Member States can be objectively measured as well as to have more harmonised data on pesticide sales and application within the EU.
3. Using the same reports - outcomes as stated in 4.1, advocate for holistic alternative strategies towards phasing out of chemical-synthetic inputs in agricultural sector.

Component	Task	Timeline
Component 1	1.1 Gathering and compiling literature review on pesticide contamination	June 20
	1.2 Workshop/meeting to discuss and agree on data collection methodology to gather data from organic operators.	April 20
	1.3 Gathering data from the sector.	August 20
Component 2	2.1 Understanding how residue findings are nowadays managed by competent authorities, control bodies, control authorities and businesses. Data collection will include 3 direct meetings to discuss the findings.	Dec 20
	2.2. Gathering specific cases of contamination and how to deal with them from EU countries	Dec 20
Component 3	3.1 Analysis of data gathered in the research conducted under the Component 1 & 2	Feb 21
	3.2 Stakeholders and experts meeting to discuss the content of the position paper on legislative needs for the organic movement	Feb 21
	3.3 Produce a thorough document to facilitate a knowledge- and evidence-based policy debate regarding contaminants in the new Organic Regulation.	Apr 21
	3.4 Advocate towards policymakers for a harmonized EU-wide approach, fair for organic operators	Jun 21
Component 4	4.1 Review the implementation of the Directive 2009/128 at MS level and with particular regard to the control system and risks for health and the environment. Evaluation of the correct application of Plant Protection Products according to labelling indications.	Through 2020 & 2021 once the first research results are available
	4.2 Advocate towards policy makers for a more qualitative implementation of the SUD directive.	
	4.3 Advocate towards policy makers to promote alternatives to chemical-synthetic inputs.	

The budget of the project is €138,000. The project will only start if a minimum amount of €120,000 will be secured by 15 March 2020. We will use the budget to subcontract researchers to gather the data, finance advocacy work carried out by the IFOAM EU office and cover direct costs related to the project, such as travels, meeting and staff responsible for project administration

Item	Budget
Research	€60,000
Coordination and advocacy work	€50,000
Direct costs of conducting the project	€28,000
TOTAL	€138,000

5 What is in it for you?

By taking part in this project, you:

- Increase your knowledge on the core issues of pesticide use and contamination;
- participate in shaping the critical debate on threshold level in the Organic Regulation (EU) 2018/848;
- discuss with other stakeholders about their approaches to contamination challenges;
- are visible as a front runner on the issue of pesticide contamination – have your logo on the project's reports, recommendations, position papers;
- strengthen the voice of the European organic movement, allowing it to have a say and decision power on the future of the Organic Regulation.

<i>Developing Organic: Pesticide Use and Contamination</i>	Gold sponsor	Silver sponsor	Bronze sponsor
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Supporter logo	X		
Access to webinar(s) on project's topic*	2	1	
Priority to receive updates, results and information	X		
IFOAM EU website			
Logo on project's page with active link to sponsor's website	X	X	X
Logo, short profile & a quote in "Sponsors" section (Developing Organic subsection)	X	X	X
Logo under news items posted about the project	X	X	X
Social media			
Logo on banners for posts related to project (does not include events)	X	X	
Social media banner with project sponsors	every quarter		
Newsletter			
Logo included in Developing organic section	all issues		
Mass mailing to IFOAM EU membership			
Logo on mass mailings related to the project	X	X	X
IFOAM EU project's publications			
Logo on project's publications	X	X	X
IFOAM EU project events – if organised			
Programme	X	X	X
Posters / Roll ups / Slides (depending on what is available)	X	X	X
Website (if a page dedicated to the event is set up)	X	X	X
Social media event posts	X		
Social media thank you post - group	1	1	
Social media thank you post - dedicated	1		
Distribution of publicity material (bag/table)*	X		
Access to exclusive events	2	1	
Events or focus groups organised by sponsor			
Participation of IFOAM EU expert on project's topic - only travel costs of the experts to cover, not the advisory fee	X	Speaker fee to be covered	Speaker fee to be covered
Fee for the duration of the project	€15,000	€10,000	€5,000

* Number of webinar might change accordingly with project developments.

** If sufficient amount provided.

Interested? Please, contact us at supportus@ifoam-eu.org

Important: The sponsorship will not provide under any circumstances any rights to the sponsors to influence or determine any position of IFOAM EU.

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