



Commissioner Borg  
Member of the European Commission  
B-1049 Brussels  
Belgium

Brussels, 29<sup>th</sup> of October 2013

**Re.: Interservice Consultation on Western Corn Rootworms.**

Dear Commissioner Borg,

We are writing to you regarding the interservice consultation, where DG SANCO is proposing to remove the Western Corn Rootworms (WCR) from the harmful organisms listed in Annex 1, Part A, Section II of Council Directive 2000/29/EC. As a result DG SANCO proposes to stop the EU surveillance of and EU requirements on the need to reduce the spreading of this pest and replaces it with a set of non-enforceable recommendations. The very likely result is that this pest will spread further, leading to increasing use of unsustainable practices accompanied by an increased use of hazardous pesticides.

NGOs and farmers' organisations wonder why the Commission on the one hand recognizes that this pest is harmful for maize and confirms that basic practices like crop rotation can stop the pest or limit its damage, thus confirming that crop rotation is the most sustainable way forward, but on the other hand still proposes to remove it from the list of quarantined pests. Simply leaving it up to Member States to fight the pest known as the 'billion dollar bug' is neither 'smart', nor 'inclusive' nor 'sustainable'.

Maize cultivation in Europe is highly input intensive and is widely linked to many environmental problems ranging from soil erosion to biodiversity loss and water pollution due to heavy pesticide use. European maize cultivation covers around 14 million hectares and is mainly used for animal feed with around 22% of EU maize cultivation by continuous monoculture (without crop rotation). It is also one of the most economically profitable crops which increases the tendency towards very large monocultures with a primary focus on high yields and not on long term sustainability.

Since 2003 Member States and farmers are meant to control the pest but we know from Member States reports that there are serious variations in both what states are doing, and what they ask farmers to do, leading to questions regarding the effective implementation of the measures to date (1). In countries where there is no mandatory use of crop rotation (e.g. Hungary), farmers use neonicotinoids - now forbidden on maize, pyrethroids (deltamethrin, cypermethrin) and organophosphate (chlorpyrifos) to combat Diabrotica. Although this first group is now banned, the other two are still authorized and are also highly toxic to bees. By giving up on mandatory crop rotation to fight Diabrotica, the European Commission incites farmers to use (bee-) harmful chemicals (and potentially to illegally use neonicotinoids).

In the National Action Plans (NAP) recently developed by Member States as part of the implementation of Directive 129/2009/EU on Sustainable Use of Pesticides (SUDP) the following countries highlight the importance of crop rotation: Sweden, Spain, Slovenia, Slovakia, Poland, Malta, Lithuania, Latvia, Ireland, Hungary, Germany, Finland, Denmark, Czech Republic, Bulgaria and Austria, with certain regions of Austria even saying that they, as part of the implementation of the SUDP, aim at eradicating the WCR (2).

As NGOs and farmers' organisations, we believe that the European Commission must act consistent with their ban on neonicotinoids and build on the strong reference to crop rotation in the Sustainable Use of Pesticides Directive. The Commission should also maintain the status of WCR as a listed harmful organism and further insist on crop rotation.

This is the reason why we ask you, and your fellow Commissioners, for a '**smart, inclusive and sustainable**' way forward which means to keep WCR at quarantine status and to ensure that the proposed measures are properly implemented.

In addition, the Commission should ensure that other decisions have been streamlined so as to avoid further spread of the pest and damage to people and the environment. Other measures that must also be streamlined include:

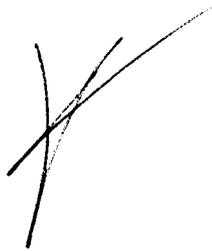
- Enforce correct implementation of the **Sustainable Use of Pesticides Directive** which requires a mandatory move toward **Integrated Pest Management** from 1/1/2014 including establishment of **farm advisory services** to train farmers and development of **specific guidelines, highlighting the need for rotation of maize**;
- Ensure Member States set up adequate **methods and tools to monitor pests**, including the continuing monitoring of the Diabrotica population;
- **Include the Sustainable Use of Pesticide Directive into the CAP cross compliances** rules as soon as possible;
- **Prevent Member States who have previously made crop rotation compulsory as part of their cross compliance rules from reversing this decision** under the new CAP;
- Avoid society overpaying twice: once by first pillar support of the CAP, and then through costly and harmful eradication measures (potentially even funded by the EU Multiannual Financial Framework's heading 3 - food safety (security and citizenship)) (4) and/or the Rural Development's mutual risk management fund;
- Prevent the **risk management tool** and the food safety measures mentioned above **from being used as a way to reimburse farmers for costs related to pest outbreaks**, when solutions are well-known and incidents can be avoided when the right practices have been followed;
- Make sure that Member States will not accept any Greening equivalence for maize monoculture under the crop diversification measure, prohibiting the consideration of corn seed, forage maize and sweet corn as different crops;

- Ensure that Member States create **Rural Development measures which support farmers in adopting a holistic approach under agri-environmental and climate schemes**; to growing crops such as maize including extended crop rotation, enlarged buffer strips etc; and in combination with targeted use of biological pest control, if required;
- Establish **operational groups**, as part of the European Innovation Partnership, to finally start testing the positive research results on the uptake of biological control measures and of risk prevention through appropriate agronomic practices.

For environmental NGOs and farmers' organisations, the case of Diabrotica makes it necessary that the EU Commission, Member State authorities, advisory services, scientists and farmers fulfil their responsibilities to stop the further spread of the pest. "Prevention is better than cure" needs to be the guiding principle of these efforts.

We call upon you, and the College of Commissioners, to ensure the proper enforcement of EU legislation with a focus on prevention and containment. We urge you not to engage in a kneejerk reaction to bail out the richest and most unsustainable part of the farming sector at the expense of negative, long term effects on the environment and public health.

Yours Sincerely,

A handwritten signature in black ink, consisting of several overlapping, fluid strokes that form a stylized, abstract shape.

François Veillerette  
President of PAN Europe

(1) Extract from Member States national reports on Diabrotica, on how they manage and control:

Since 2003 Member States and farmers are meant to control the pest by using traps to follow the spread and making it mandatory for farmers to apply crop rotation in demarcated and safety zones as defined in Commission Decision 2003/766/EC. But from the annual reports that Member States send to the European Commission, it can be seen that there are significant variations in what Member States are doing and what they ask farmers to do:

- Hungary, which produced 1.4 million ha of maize, clearly states in their '2011 survey report' that they sent to the European Commission that they have not implemented the EU law. Germany, which produced 2.295 million ha of maize in 2011, clearly states in their 2011 survey report for the European Commission that they considered it was not necessary to apply crop rotation (and insecticide control) as they believed monitoring in the security zone was sufficient.
- By contrast, reports from countries like Poland, Belgium and Italy recognised the importance of using crop rotation as a tool to combat spread, stating that crop rotation was introduced in safety zones.

(2) In certain Austrian regional (N)APs it is an objective: *'to eradicate the corn root worm in established areas and the neighbouring zones of natural spread, crop rotation must be organised in such a way that maize is cultivated only at most in three years in succession. The sowing of pre-basic seed and basic seed for seed maize production is exempted from this. Improper handling of seed treated with insecticide or improper distribution of the seed may harm bee populations'*.

(3) Germany, Italy, Poland, UK, Romania and others currently offer regional or national standards for crop rotation under GAEC; See FoEE (2009) Overview of Member States applying crop rotation as one of their 'good agricultural and environment conditions' (GAEC) in 2009 based on information from DG AGRI with countries and their type of crop rotation, [http://www.foeeurope.org/sites/default/files/foee\\_ms\\_gaec\\_overview\\_crop\\_rotation\\_2009.pdf](http://www.foeeurope.org/sites/default/files/foee_ms_gaec_overview_crop_rotation_2009.pdf)

(4) The €1.891bn for 2014-2020 in the multiannual framework for food safety underneath heading 3 (security and citizenship) is according to <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=SWD:2013:0194:FIN:EN:PDF> targeted at: direct economic losses for operators, indirect impact on trade, threat to public health, to support among others eradication and surveillance actions.