



**Pesticide  
Action  
Network**  
Europe

19 December 2024

## **Subject: Electronic registration of pesticides data should be implemented without delay**

Dear Commissioner Várhelyi,  
Dear Commissioner Hansen,  
Dear Commission Dombrovskis,

We are writing to you to express our acute concerns regarding the attempts of some Member States to postpone the digitisation of record-keeping for pesticide data by two years. It is essential that electronic record-keeping of pesticides is implemented without delay, from 1 January 2026, as determined by the Implementing Regulation (EU) 2023/564. Delaying digital record-keeping is unacceptable for the following reasons:

- **Since 2009, Regulation (EC) 1107/2009<sup>1</sup> obliges professional users to keep records of pesticides used** (name, time, dose of application, area and crop) for at least 3 years, and to provide this information to competent authorities (on request of the competent authorities).
- **The Council expressed to the Commission the need for electronic record keeping to facilitate the annual collection of data on the use of pesticides.** This demand was formulated in the framework of the negotiations on Regulation 2022/2379 on statistics on agricultural input and output (SAIO) in June 2022<sup>2</sup>.
- **Following the expressed needs, the Commission proposed Implementing Regulation (EU) 2023/564<sup>3</sup>.** The Implementing Regulation was adopted after elaborate consultation with member states. The obligation to keep data electronically is mandatory only from 2026, to provide enough time for the practical implementation.
- **Regulation (EU) 2023/564 facilitates the fulfillment of existing obligations of data keeping laid down by Regulation (EC) 1107/2009, as well as of the obligations of the SAIO regulation.** Digital record keeping of pesticide data will in fact greatly decrease the administrative burden, while providing more accurate information. During the EU AGRI-Food Days 2024, **electronic data keeping was also underlined as one of the key tools in reducing**

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<sup>1</sup> [Regulation \(EC\) No 1107/2009](#)

<sup>2</sup> [Regulation \(EU\) 2022/2379 - Provisional Agenda - Special Committee on Agriculture - June 2022](#)

<sup>3</sup> [Implementing Regulation \(EU\) 2023/564](#)

**bureaucratic burden for farmers.** In addition, postponing electronic record keeping would not postpone the SAIO obligations to provide data in electronic form.

- **The SAIO Regulation and the Implementing Regulation (EU) 2023/564 (related to 1107/2009) are crucial for Member States, EU citizens including farmers, and EUROSTAT, as it establishes a standardised framework for the collection, reporting, and analysis of data on agricultural inputs and outputs across the EU.** Together, these regulations support evidence-based policymaking by ensuring the availability of reliable, comparable, and up-to-date statistical data, which are essential for addressing key challenges such as food security, environmental sustainability, and climate change. For **Member States**, it facilitates compliance with EU-wide policies and enhances their ability to monitor and improve agricultural practices. **Farmers** benefit directly from the SAIO regulation as it enables the development of informed policies and support measures that address their needs, improve productivity, and promote sustainable farming practices. Other **EU citizens** benefit through improved transparency and accountability, as the data informs policies that directly impact food safety, environmental health, and sustainable development. For **EUROSTAT**, the regulation strengthens its capacity to provide high-quality statistics, which are vital for guiding EU decision-making and fostering economic and environmental resilience across the Union.
- **Public and transparent access to digital data on pesticide use is essential and long overdue.** Pesticides are a major cause of the collapse of biodiversity, pollute our soils and water bodies, degrade ecosystem services, and pose extensive risks for the health of farmers, their families and communities, and other citizens. **The lack of pesticide use data is a major barrier to robustly assess pesticide trends.** Public authorities, citizens and scientists need access to robust pesticide use data to assess (spatial) trends in pesticide use and risk. Pesticide sales have not decreased significantly in the EU since 2011. Pesticide use data and spatialisation are a prerequisite to uncover patterns of pesticide use and precisely inform the urgent measures needed.
- Through European citizens' initiatives, consultations, an IPSOS opinion poll, the Conference for the Future of Europe and EU Barometers and petitions<sup>4</sup>, citizens have expressed repeatedly that pesticides pose a **major societal concern. Scientists have urged ambitious action to reduce pesticides**<sup>5</sup>. Ensuring availability of digital pesticide data is an essential responsibility of the Commission and Member States.
- The need for robust digital data was also underlined in the Outcome of the **Strategic Dialogue on Agriculture**, which calls for launching an **EU-wide benchmarking system** in agriculture and food systems, aiming to **harmonise methodologies of on-farm sustainability assessments**. Also in this regard, the digital record-keeping of pesticides is essential and urgent.

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<sup>4</sup> [ECI Save bees and farmers](#), [ECI Ban glyphosate and protect people and the environment from toxic pesticides](#), [Attitudes of Europeans towards the environment](#), [Food Safety in the EU](#), [Making our food fit for the future – new trends and challenges](#), [Modernising and simplifying the Common Agricultural Policy](#), [IPSOS Poll - Pesticides. Play it Safe!](#), [EU Commission representatives meet organisers of pesticide reduction petition](#)

<sup>5</sup> [We need a food system transformation - In the face of the Russia-Ukraine war, now more than ever, March 2022](#), [Scientists call for ambitious Sustainable Use of Pesticides Regulation](#), [Scientists support the EU's Green Deal and reject the unjustified argumentation against the Sustainable Use Regulation and the Nature Restoration Law](#)

Given the above, any further delay in digital record-keeping of pesticides is unacceptable.

Thank you very much for your time and consideration.

Sincerely,

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