

## Presentation on the SUR to COPA-COGECA FHY, Plants and Crops Working Parties

8 July by MS Teams

Commission attendees: [REDACTED], [REDACTED], [REDACTED] (all SANTE F3)

The meeting was requested by COPA-COGECA. Approximately 60 COPA-COGECA members attended. [REDACTED] gave a presentation on the main legal elements of the SUR and how it differs from the current SUD.

Questions raised included what is the scientific basis for the ambitious pesticide targets, why a MS such as LV which only uses 1 kg PPP per ha apparently has to reduce its use by 52%, why a MS such as DK which had already reduced its use by a lot should now be punished with a further 50% reduction, why can't the national target go below 35%, when will SANTE share with MS its modelling and calculation of how the targets may be adapted nationally, what practical use is the planned register on PAE, why does the ownership of the PAE need to be recorded, will there be interoperability of such electronic systems if PAE moves between MS, stakeholders have been asking for administrative simplification and are now faced with many new administrative burdens, will CAs have sufficient staff to monitor implementation of the new legislation, the current definition of sensitive areas would see a lot of agricultural land go out of production (e.g. >3.5 million ha in DE producing 7 million tonnes of cereals per year), does COM have the capacity to assess all IPM guidelines issued by MS (LV already has 25 such guidelines), the proposal actually delivers no new funds, all CAP monies have been already allocated, the timeline for the proposal does not line up well with CAP NSP programming periods, who will have access to the various data to be recorded under the proposal and which data, why does the proposal give MS flexibility to introduce nationally stricter rules if we are aiming for a level playing field, how will the concept of "independent" advisors be applied, would cooperative staff be classed as independent, why propose targets if MS CAP NSPs already submitted contain no such targets, there is a shortage of alternative biological products, delays in their assessment and authorisation and some are not available in certain MS especially in the North, will spraying by drones be considered as aerial application of PPP, the idea of SUR must have been developed when Europe was oversupplied with feed and food and fertilizers and favouring NGO's and organic interests of society; this time is gone for many years now, Natura 2000 areas are widely represented in EU and it would be a concern if PPP use is completely prohibited in these and other areas, is SANTE making a comparable effort on other files such as use of antibiotics, will a farmer with a higher degree in agriculture need to use an adviser, there is a concern that farmers will bear all the costs and burdens resulting from this proposal, farmers need disease-resistant crop varieties and alternative methods that work in field conditions.

[REDACTED] and [REDACTED] answered the questions which could be addressed in the available meeting time. COPA-COGECA will compile the additional and unanswered questions and send them to SANTE for possible responses and follow-up.