



AGRICULTURE & PROGRESS' REACTION TO THE NEWLY PROPOSED RULES FOR SUSTAINABLE PESTICIDE USE

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The Agriculture & Progress Platform brings together sugar beet growers, maize growers and sugar manufacturers at European level, practicing and striving to further improve sustainable agricultural production. We have recently been confronted once again with the necessity of keeping food production in the EU in order to ensure sufficient food security. Making sure the EU agriculture and primary food processing sector remain competitive is therefore key and plant protection products (PPPs) are important in that context. Therefore, we are closely following the proposed Sustainable Use of Pesticides Regulation (SUR). As a complement to our earlier position, we would like to express our specific views on some key elements of the proposal.

Evaluate the REAL impacts

- The Commission should carefully assess the feasibility of reaching the 50% PPPs reduction target by 2030 (compared to 2015 – 2017 baseline). The impact assessment mentioned by the Commission is not an impact assessment underpinning the proposed SUR but only a qualitative overview of different policy options and of a number of studies on the new regulatory landscape. While these studies provide insights on how food production may evolve if the reduction targets are met, they by no means sufficiently assess the impact of trying to reach these reduction targets. Furthermore, no distinction is made between crops, which disregards agricultural reality.
- We therefore call on the Commission to perform comprehensive impact assessments on production, costs, prices, reduction of GHG, necessary investments and trade in order to adopt rules that are operational and do not unsustainably deplete the toolbox for crop protection. These impact assessments should ultimately provide quantitative assessments of the targets vis-à-vis the Commission's objective to ensure "sufficient, affordable, healthy and environmentally friendly food". The proposed targets should not endanger food security and resilience of the EU food system.
- In line with the previous point, the impact of the proposal to ban all PPPs in "sensitive areas" and the consequences of operating a 3-meter buffer zone have not been evaluated. They could not have been, as a common definition of what a sensitive area includes is yet to be adopted at EU level. Hence, it is impossible to have full clarity on total areas affected. As it stands, the proposed ban to use PPPs in sensitive areas appears unrealistic as it would jeopardize a significant acreage of arable crop land and is therefore not acceptable.

Integrated Pest Management (IPM) works: it should be further developed and improved and include support for innovative New Genomic Techniques

- The proposed crop-specific rules are too rigid. The double conditionality mechanism, establishing that chemical PPPs can be used "only after all other non-chemical methods have been exhausted and when a threshold for intervention is reached", should be removed from the current proposal, as it risks leading to situations in practice where by the time the double conditionality is fulfilled, the use of chemical PPPs will come too late to ensure satisfactory control of harmful organisms – the damage will have been done. Instead, the Commission should apply the current definition of IPM (Article 6.3 of the current Sustainable Use of pesticides Directive) to avoid situations where the application of chemical PPPs as a last resort would be too late and too limited to provide satisfactory control of harmful organisms, be they pests, diseases or weeds.
- IPM should be fully recognized as a key management tool where it is already practiced. It should be further improved and encouraged. Some would claim that IPM has failed and is applied only marginally. There is no evidence to underpin this, quite simply because there is no system to assess the implementation of IPM, be it at regional, Member State or EU level. Huge data gaps exist. There is therefore no evidence whatsoever that IPM 'doesn't work' or that farmers have failed to implement IPM. Drafting rules with regard to IPM must be based on a realistic assessment across the EU, taking into account the diversity of agriculture in Europe. This is impossible today and we therefore feel that this part of the proposal certainly does not live up to the EU Commission's criteria of evidence-based decision-making.

- IPM, sufficient support for innovation must be foreseen for New Genomic Techniques (NGTs). NGTs and their potential to contribute to reduction targets (notably via the rapid and targeted development of disease-tolerant crop varieties), should be explicitly mentioned as viable alternatives to chemical PPPs. In this context, appropriate and fit for purpose legislation on plants obtained by NGTs and their products should be introduced as soon as possible to allow them to contribute to meeting the reduction targets.

Moving to sustainable alternatives provided they are also affordable and equally effective

- Technical stalemates in crop protection must be avoided in light of the availability – or lack thereof – of effective alternatives to chemical PPPs. The current toolbox is being depleted at an alarming rate, putting farmers in technical deadlocks. To allow for further improvement of good crop protection practices, new tools (including new, more tolerant/resistant varieties) must be made available to farmers as soon as possible.
- Any proposed alternatives to chemical PPPs should be affordable, effective, safe and sustainable. In our view, the suggestion to facilitate the approval of PPPs containing biological active substances is not enough. Such products have not proved to be effective so far for many crops – in terms of satisfactory control of harmful organisms – nor will they become available to farmers in the short and medium term to provide satisfactory control of harmful organisms, which is currently still being achieved with a decreasing number of chemical PPPs.
- Overall, the proposal on SUR and its targets should only be examined once sustainable alternatives and innovative tools, such as NGTs, would be made available through implementation of appropriate regulatory framework. Before setting highly ambitious reduction targets for PPP use, the Commission should first focus on making effective alternatives to chemical PPPs (including disease-tolerant crop varieties obtained from NGTs) available to farmers so that the use of chemical PPPs can be reduced without jeopardizing crop yield or risking crop failure.
- Harmonised Risk Indicators (HRI) should be tailored to specific crops and take into account the availability of effective and cost-efficient alternatives. In the case of sugar beet, the proposed weighting is extremely disadvantageous, with only 1 low-risk active substance (with a weighting of 1) actually on the market, 15 CFS (with a weighting of 16), approximately 5 non-approved substances with an emergency authorization (with a weighting of 64), and the remainder with a weighting of 8.

Reciprocity between production standards of EU products and of imported products: a horizontal measure in agriculture and food policy

- Impact assessments are necessary to assess the consequences of the proposal on trade and its consistency vis-à-vis trade policy.
- At EU level, PPP active substances are being removed from the market at a much higher pace than new PPP active substances are being introduced. This will not only lead to an increase of imported products and degradation of EU competitiveness. It will also lead to a leakage of damage to health and the environment to third countries. To avoid such leakage and ensure the protection of health and the environment, the EU must ensure the reciprocity of production standards between EU products and products imported into the EU, via MRLs and import tolerances as well as via mirror clauses. In a nutshell, an active substance not authorized in the EU should not be used in third countries to grow crops and/or their final products, which are then imported into the EU. We call on the EU Commission, in the development of its policies, and especially its trade policy, to take a much more proactive stance on mirror clauses and to integrate them systematically on a horizontal level in policy initiatives and international agreements. This is a pre-condition, otherwise this proposal, together with the Green Deal targets, will be doomed to fail.

We consider the above points as vital to guarantee a viable environment for EU farmers and primary food processors. We urge the Commission, Member States and the European Parliament to take these into account for the upcoming political discussions.

For more information, please contact: platform@agriprogress.info.