

CropLife Europe position on the joint committee report on the Farm to Fork strategy

The Farm to Fork strategy seeks to improve sustainable food production and consumption with a holistic approach. CropLife Europe supports the ambition of this Strategy and is committed to sustainable agricultural technologies. As an Industry that supports farmers and food production, we commit to playing our part to innovate for the delivery of the Green Deal objectives and the deployment of ever more sustainable solutions. CropLife Europe welcomes the opportunity to comment on the joint draft own initiative report.

Key points

- CropLife Europe strongly believes that **innovation is a key part of the solution**. Our companies will continue investing in innovative ways to protect crops and foster sustainable agriculture with huge investments into a wide range of solutions including: ever more environmentally-friendly pesticides, biopesticides, more sustainable plant varieties and precision technologies. CropLife Europe members have **adopted a set of ambitious commitments to support Europe's new Green Deal**, including an investment of over €14 billion in new technologies and more sustainable products by 2030¹.
- Enabling innovation to contribute towards achieving the Farm to Fork objectives will **require an enabling regulatory environment, direct support to farmers and incentives** to ensure the best technologies that will make a difference can be developed and deployed at the earliest opportunity. Plant breeding innovation as well as newer, and continuously evolving breeding techniques, have the potential to enlarge the farmers' toolbox and make food production increasingly more resilient to the pressures of climate change.
- In order to establish realistic, meaningful and evidence-based targets a **comprehensive, holistic impact assessment is required**. This should cover the individual and **combined impact of proposed targets and measures resulting** from the Farm to Fork and Biodiversity strategies and other Green Deal initiatives, in accordance with the principles of Better Regulation, before legislation is proposed. This will be necessary to ensure legislation will deliver a more sustainable agriculture which helps to meet the EU's climate target plan and protects biodiversity, whilst ensuring that European consumers continue to have access to safe, sufficient, affordable and nutritious food.
- **Stimulating sustainability in farming should be focused on farm performance** and outcomes, rather than on any particular farming model used, taking account of land use efficiency and carbon footprint.
- We **support increased organic agriculture in Europe**, as long as it is **driven by growing consumer demand** and the resulting reduction in European agricultural productivity does not lead to unintended land use changes in other parts of the world, which could have detrimental effects on biodiversity and climate.

Additional Explanation

Promoting digital farming

- **Measures within the Common Agricultural Policy should promote innovative solutions and facilitate** the uptake of digital farming technologies and support farmers in acquiring know-how in order to further optimise their decision-making and use of integrated pest management (IPM) in crop production. The EU and Member States should do more to enable the update of technologies including

¹ CropLife Europe, 2030 Commitments (2020), available: <https://croplifeeurope.eu/commitments/2030-commitments/>

biopesticides, precision application tools and innovative plant breeding techniques to support sustainable agriculture.

- We support the Commission's goal to update the rules on data about the use of pesticides to overcome existing data gaps. **Adequate data will reinforce evidence-based policymaking, informing impact assessments on legislative proposals.** It is vital that what is proposed now by the Commission will deliver for the environment, there will be no second chance and evidence is needed to make sure the approach is correct.
- CropLife Europe recommends that the Commission **explore using the newest digital technologies** that can act as the main catalysts in order to gather these data and to allow farmers to concentrate on their main roles, stewarding the land to produce safe and high-quality food for European citizens.

Reduction target for pesticides

- We hope for a well-reasoned, **science-based discussion** with the European Institutions focused on **coherent, evidence-based policy instruments.**
- Harmonised Risk Indicator (HRI) targets should be based on 2014-2017 as a **baseline average** to ensure peak pesticide use is included in the benchmark, as well as varied use times (usage can change a lot due to climatic conditions, disease and pest pressure).
- While this will be very challenging for us to deliver on, and although imperfect, the **Harmonised Risk Indicator 1 (HRI1) seems to be a reasonable way to measure the hazard reduction of pesticides.** To further improve the HRI1 the Commission should consider an indicator for agricultural productivity. It is important to ensure food supply is secure and resilient in general and in times of crisis.
- **Improved implementation** of existing legislation could help adaptation to climate change and bring new technology to the market to deliver sustainable agriculture. We are concerned that the European regulatory and policy environment is less and less open to the development and application of innovation in the crop protection sector, and that in a foreseeable future, **European farmers will continue to lose tools** faster than new ones can be found. Chemical and biological active substances have to be considered as complementary tools, rather than a direct replacement of one over another. Recent research shows significantly lower yields (10-40%) for seven staple crops if a large portfolio of substances were to be removed².

Organic farming

- CropLife Europe member companies provide a large share of the crop protection tools to organic farmers and welcome and support the continuous development of the organic sector at EU level, recognising it as a **dynamic agricultural sector** fulfilling a growing market demand.
- It is important to note the **ecological trade-offs involved** in organic farming: organic production is characterised by a significantly lower yield output and key pesticides approved for organic agriculture are often used in much larger quantities than other chemical pesticides³.
- We believe **that a truly holistic approach is needed to balance these tensions** and achieve the climate action that is needed whilst preserving farmers' capacity to produce enough food.

CropLife Europe formerly known as the European Crop Protection Association has expanded its scope of mandate as of 1st of January 2021. Alongside pesticides, CropLife Europe will represent 22 company members and 32 national associations in the area of digital and precision farming, plant biotech innovation and biopesticides.

² Kim, R., van Drunen, A & Boogers, N., (2020), *Low Yield II: Cumulative impact of hazard-based legislation on crop protection products in Europe*, Available: https://issuu.com/cropprotection/docs/low_yield_report_ii

³ Scientific Foresight Unit (STOA), (2019), 'Farming without plant protection products: Can we grow without using herbicides, fungicides and insecticides?' (PE 634.416), available : [https://www.europarl.europa.eu/RegData/etudes/IDAN/2019/634416/EPRS_IDA\(2019\)634416_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/IDAN/2019/634416/EPRS_IDA(2019)634416_EN.pdf)