

Annex

“Re: the current and future rules for sustainable use of plant protection tools must not compromise the competitiveness of EU farmers, nor the food security of our citizens”

Below we would want to share with you some of our concerns based on the leaked proposal for a “Regulation on Sustainable Use of Plant Protection Products”:

1. Arbitrary reduction targets and the negative impact foreseen by scientific studies in a difficult present and future socio-economic and political scenario in Europe

In principle, Copa and Cogeca are not against the objectives set in the F2F and, as a matter of fact, it is first and foremost EU farmers who have an overriding interest in ensuring sustainable production while taking care of the environment and consumer demands. However, the reduction targets, at least as far as the use of chemical pesticides by 2030 is concerned, are very arbitrary and hard to achieve in the context of the current socio-economic and political challenges that Europe is facing.

While generally supportive of the move towards more sustainable production systems and methods, Copa and Cogeca have been calling for a comprehensive impact assessment of the targets and measures proposed on farming. For quite a long time prior and following the publication of the F2F, we were waiting for official statistics and fact-based evidence before engaging in the discussion or judging the merits and relevance of the approach adopted by the Commission. However, the different studies published last year (JRC, Wageningen, USDA, COCERAL, Euroseeds, Kiel University, INRAE) pointed to a worrying direction: the production of EU agriculture will severely decline, prices and farmers income will be profoundly affected, and the environmental gain will be very limited due to third country environmental leakage. Moreover, the EU’s dependency on food imports will increase drastically and some studies even foresee the EU turning into a net importer.

In this regard, we are quite concerned to see that the Commission seems to acknowledge that this Regulation proposal will have negative side effects, such as an expected reduction of yields due to lower pesticide use and increased imports from third countries with less strict regulation of pesticide use. If the Commission is already aware of these negative effects, it would be wise to first build a bulletproof system that neutralises these negative side effects and guarantees the competitiveness and robustness of the EU agricultural sector before setting a legally binding target that, in any case, may not be realistic and which could be very detrimental for the continuity of farming activities in the EU.

2. Maintaining a level playing field in international trade

Raising the standards for producers in the EU while at the same time allowing imports of products from third countries that meet lower requirements for pesticide use than the ones

European farmers must meet puts the latter at a great economic disadvantage. We call on the Commission to ensure a level playing field for EU producers and ask for at least equivalent standards for imports to those to be applied in the EU.

3. Imposed reduction on the use of chemicals with not enough alternatives at hand

Focusing on stricter rules for farmers will not solve the underlying problems for plant protection and banning different products without having sufficient effective alternatives is not an efficient approach. It is essential that the EC provides for reasonable transition periods, during which the supplying sector can bring new alternative products to the market, with special attention for minor crops production. Farmers currently apply Integrated Pest Management (IPM) in their fields. However, the lack of proper alternatives to chemicals for plant protection is pushing farmers to rely on emergency authorisations which, although encouraged by the Commission, are not always granted by national authorities in a timely manner.

In this context, it is of the utmost importance to implement a real simplification, speeding-up, and differentiation of the registration of low-impact PPPs and pest control solutions from chemical-related procedures. This should be done to increase the availability of low-impact and effective crop protection solutions for farmers in a timely and affordable fashion. Furthermore, it should envision further uptake of IPM implementation in an effective manner that may guarantee high food safety and security levels for our consumers.

Besides, we are concerned about the definition of "sensitive area" in which the use of all plant protection products is prohibited. In certain Members States, practically the whole agricultural area could be considered as a "sensitive area" if certain provisions (geographical, climatic, etc) are considered.

4. Usage indicators vs sales indicators

As there is not yet enough usage data on chemical pesticides available to the Commission, Copa and Cogeca would be in favour of the Commission developing another type of indicator more suited to assessing usage instead of sales as is the case with the current Harmonised Risk Indicators (HRI). Moreover, we contend that having data on pesticide sales averaged over only 3 years (2015-2017) and translated into usage by a formula is not enough of a basis to properly set any reduction target.

5. Increase of administrative burden and detailed data sharing

It is important to avoid significantly increasing the bureaucratic and administrative burden for farmers when demanding collection of data on the application of plant protection methods. A too frequent and detailed data collection would hamper the daily activities of farmers as they may need more time to collect data on inputs rather than produce food or certain crucial non-food supplies.

Data collection should not put farmers' data ownership at risk. When setting out the conditions and requirements for data collection, the Commission should ensure that farmers remain the owner of the data produced if bound to share all data electronically and if third parties in different Member States will be able to demand access to it in the interest of transparency. Data disclosure should, therefore, be done in a manner that fully respects the privacy rights of individuals and data ownership. In summary, from our perspective, the keywords for the revision of SUD should be flexibility, research, training, and precision farming. It is equally important to focus on the availability and development of common guidelines which may be shared among farmers.

Such guidelines should serve to further develop on-field IPM schemes where it may actually be the case that chemicals are only used for plant protection as a last resort. From our perspective, this would be a better approach than imposing a forced, random and non-science-based quantitative reduction in the use of plant protection products. To achieve this, sustainable,

science-based, effective, safe, and affordable plant protection systems are crucial to provide EU farmers with the necessary tools to remain competitive inside and outside the EU's borders.

Last but not least, we are concerned that the obligation to establish a system of independent advisors for professional users may question the impartiality and the work of the technical and agronomic services of the agri-cooperatives. This impartiality will always ensure that the cooperative – and therefore their members – obtains the greatest benefit, at productive level as much as with the collective commercialization of its production.
