

ECPA's position on the up-coming Farm to Fork initiative

The European Crop Protection Association (ECPA) **welcomes the European Commission's Green Deal and supports achieving a climate neutral Europe by 2050**. As an industry that supports farmers and food production, we particularly appreciate the holistic approach proposed to address the climate crisis. Farmers have been strongly hit by climate change and we have tools that help them to adapt and the potential to innovate for carbon capture in agriculture. To really improve sustainability, a careful assessment of trade-offs based on evidence, not rhetoric, is needed. As a result, all stakeholders, with different viewpoints, must be fully consulted to deliver this agenda and the transitions that are needed as rapidly as possible.

We understand Plant Protection Products (PPPs) will be one feature of the Green Deal and we hope for a well-reasoned, **science-based discussion** with Commission proposals focused on a **limited set of policy instruments to avoid a fragmentation of the rules across different legislations**. **We also would like to insist on the need to accelerate innovation** for the critical challenges ahead. A fine balance needs to be struck between climate change mitigation measures and ensuring the continuation of safe food production. Under a changing climate, farmers will require more innovative tools to control new threats from mycotoxins and invasive alien species, as predicted by EFSA. ECPA and its members are fully committed to contribute in a constructive way to the European Green Deal discussion and will make clear commitments to support the Commission's agenda, especially in the areas of circular economy, R&D investment for greener ways to protect crops and training of end-users of our products to ensure they are used properly and only when necessary.

We welcome the intention of the Farm to Fork strategy covering the whole agri-food chain, from producers to consumers. The EU law quite rightly ensures that our products may only be sold where there is no harmful effect on people and no unacceptable impact on the environment, and should only be used when needed. Despite the existence of these safety measures, we recognise societal concerns associated with pesticides and we acknowledge the Commission's willingness to reduce both **risk and use**. While this will be very challenging for us to deliver on, **ECPA views the use of the harmonised risk indicator 1 (HRI 1)** developed and published by the European Commission **as a reasonable way to measure the hazard reduction of pesticides** used in both organic and conventional agriculture. We want to play our part and having already reduced pesticide application by 97% during the last 60 years, we will re-double our efforts to meet this challenge. Any proposal for HRI targets should use a **baseline level made from the average index in the period 2014-2017**. We believe that taking an average over 4 years will accurately reflect the intrinsic and real variability of pesticide use (e.g. changes in use due to climatic conditions, disease and pest pressure). We would like to encourage the Commission to consider adding an indicator that also

measures the consequences that farmers will face if no alternative solutions are brought on time to the market.

ECPA represents EU market leaders supplying pesticides to the organic, low till, conservation, agroforestry and conventional agriculture models. As solution providers, we deliver safe products for all types of production systems; products of natural origin such as microbials, natural substances or pheromones and products of chemical nature, to adequately control pests, diseases and weeds. We believe that organic production has a role to play in the mix of agricultural systems that we defend and therefore **we support the European Commission's aim to increase organic production in Europe in order to meet growing consumer demands**. However, it is important to note that there are **ecological trade-offs implied by an increase of organic agriculture**, which should be considered. **These include an increased overall volume of pesticide use in Europe as some products commonly used in organic agriculture need to be applied in much larger quantities than low rate chemical alternatives, more agricultural land is needed to maintain the same level of productivity and more greenhouse gas emissions are likely due to more interventions in the fields.** We believe that a truly holistic approach is needed to balance these tensions and achieve the climate action that is needed whilst preserving Europe's capacity to produce enough food for an ever-growing population. In this perspective, **we would welcome the creation of a specific indicator linked to the use of pesticides in organic agriculture.**

Finally, DG SANTE is preparing the final report regarding the **REFIT exercise conducted on the Regulations 1107/2009** regarding the placing on the market of pesticides and biopesticides and **396/2005 on maximum residue levels of pesticides**. We reiterate our view that **the legislation is fit for purpose and delivers on its goals to protect human health and the environment**. We believe that any **necessary improvements can be achieved by ensuring better implementation of the current system to enable innovation**, rather than by amending the legislation. Targeted improvements would allow the necessary tools for change to reach European farmers faster, and continues to ensure that there is no risk to the food supply in Europe. On the latter point, we would also appreciate **a reasonable EU approach on the MRL/IT policy applicable to treated commodities coming from third countries**. Smallholder farmers who produce important crops for Europe such as tea, coffee, cocoa for chocolate, exotic fruit etc. have different disease and pest pressures to deal with, especially in tropical environments. **In order to achieve the zero hunger and no poverty Sustainable Development Goals it's important that these farmers have the right tools, too.** We believe **DG AGRI and DG TRADE should be associated to this policy discussion as its impact can be important and it needs to be compatible with the EU WTO SPS obligations.**

Overall, we are concerned that the European regulatory and policy environment is less and less prone to allow the development and application of innovation in the agricultural sector, and that in a foreseeable future, European farmers will continue to lose tools faster than new ones can be introduced.