



Brussels, 28th May 2021

Joint open letter from agri-food chain organisations regarding the future availability and use of crop protection tools in the framework of the EU Farm to Fork Strategy

The food produced in the EU is recognised for being safe, nutritious and of high quality. With the Farm to Fork and Biodiversity Strategies, the Commission has set out its ambition to position the EU as the gold standard for environmental, social, and economic sustainability at global level. The co-signing associations of the agri-food value chain support this ambition; in fact, we believe in many cases, our sectors already are the global gold standard.

The co-signing organisations, which are members of the Agri-Food Chain Round Table on Plant Protection and whose logos are included on top of this communication, call on the Commission to take into consideration the following points:

1. The need to carry out a **comprehensive assessment of the cumulative economic, social and environmental impacts of the various targets** for EU agriculture set out in the Farm to Fork and the Biodiversity Strategies before taking any political or binding regulatory decisions. This is critical to identify areas for which urgent action, accompanying measures or support are needed.
2. **The targets proposed should not only be coherent and consistent across the European Green Deal initiatives, but also useful, measurable, realistic and achievable.**
3. The **targets should be science-based, technically feasible and economically sustainable** to enable the long-term economic viability and competitiveness of all players in the food supply chain.

In order to deliver on the ambitious Green Deal objectives, any proposed combination of policy measures needs to balance trade-offs without leaving anyone in the food supply chain behind - especially in the aftermath of COVID-19. This means that the policy options under consideration need to be science-based and premised on solid data. This is too important an issue for there not to be a full assessment of the potential consequences.

Recognising what has already been done...

The co-signers believe that it is important to recognise what has already been delivered by EU supply chain stakeholders in terms of the sustainable use of pesticides.

In Europe, pesticide use and risk has decreased sharply over the past 50 years. Thanks to innovation in agriculture, the average use rate of active ingredients per hectare for herbicides, for instance, has dropped by 97%¹. Ultimately, over the past 60 years, the average use rates of newly introduced active ingredients have been reduced². Currently less than 470 active substances (including 29 low-risk active substances and 23 basic substances³) are available on the market to protect our crop and plant production.

All the substances on the market are assessed and approved to counter real, documented pest pressure and plant disease needs. Besides, they are always assessed not to present any unacceptable risk to human health or the environment according to the conditions of use, before being put in the market.⁴

What still needs to be done?

To achieve the targets and fulfil the objectives set in the Farm to Fork Strategy, producers need to have enough safe, effective and affordable tools at hand to ensure food security and sustainable production, including biocontrol technologies, crop rotation systems, digitalisation methods, New Genomic Techniques and resilient varieties for EU crops and plants.

Integrated Pest Management (IPM) itself uses chemicals only as the last resort, as described in the EU Sustainable Use Directive 128/2009. While the reduction in conventional pesticide use is of course positive, it also means that producers have fewer tools at their disposal to combat changing production conditions. It is therefore critical that a policy framework is put in place that supports crop protection needs through an appropriate combination of existing and emerging technologies/opportunities. We call on the EU Institutions to further enlarge the risk analysis paradigm for crop protection using a more holistic approach, and to therefore have it include the science-based risk assessment and the socio-economic impact assessment.

Lower risk crop and plant protection alternatives must be effective, affordable and safe and be able to get onto the EU market more efficiently. This would equip farmers, and farm advisers, with the tools needed to fully implement IPM schemes, which, in turn, will support the use of effective, affordable and safe crop protection alternatives.

Nevertheless, despite the EU food chain's interest, in particular that of primary producers, in applying low-risk PPPs and other sustainable technologies, such products are often still not readily available. There are many issues that we can highlight with the status quo: slow authorisation procedures; authorisation of products with lower efficacy; slow innovation progress; lack of mutual recognition; high cost-effectiveness ratios; a lack of affordability and accessibility for farmers.

Answers to the challenges that lie ahead require substantial investments in research, innovation and in the development of new tools throughout the agri-food chain. It is therefore essential that we keep investments flowing into this area to bring to the market effective, affordable and safe plant protection alternatives and technologies that are well adapted to the EU agricultural system and circumstances. For this to happen, the policy framework needs to be adapted. This includes adopting a horizontal EU innovation framework.

In addition to this, we believe that the EU institutions should advise farmers to and reward those who go the extra mile in terms of the sustainability of their crop protection systems, while ensuring profitability for the agricultural and rural community as a whole.

¹ EEA, 2018

² Phillips McDougall, 2018

³ EU Pesticides Database, 2021 (https://ec.europa.eu/food/plant/pesticides/eu-pesticides-db_en)

⁴ Regulation (EC) No 1107/2009 of the European Parliament and of the Council of 21 October 2009 concerning the placing of plant protection products on the market and repealing Council Directives 79/117/EEC and 91/414/EEC

With regard to the impact of these targets in international trade, we have to bear in mind that goods imported into the EU also form an essential part of the agri-food chain. Moreover, it is in the EU's interest that other producing countries interested in continuing their trade relations with the EU also have the possibility to adapt to these requirements without upsetting the balance of international trade. We call on the Commission to consider a realistic time frame before making any legislative decision or change in the near future.

Furthermore, to properly deliver on the objectives of the Green Deal this transition to more sustainable crop protection systems should be accompanied by efforts to ensure adequate Common Agricultural Policy (CAP) eco-schemes.

Last but not least, we also regret the fact that there is not yet a common EU approach – not even in the Farm to Fork Strategy – to support the important niche market that is the production of speciality crops. These types of production also lack tools to protect their crops, which has a considerable impact on these sectors. It would certainly be useful to also improve the procedures relating to the use of present and future tools for speciality crops.

Therefore, the co-signing organisations remain committed to an ongoing structured dialogue between the European Commission, Member States and EU food chain actors. Such dialogue has never been so essential as we try to attain the ambitious Green Deal targets. We need to identify and address the cross-cutting challenges and trade-offs together. Furthermore, these targets should pay particular attention to micro, small, and medium-sized enterprises, while preserving ecosystems and increasing the resilience of our EU food system.

The co-signing organisations listed above trust that the ideas and proposals outlined in this letter will be taken into account, and remain at the Commission's disposal to collaborate further on the implementation of the Farm to Fork and the Biodiversity Strategies.