



Copa and Cogeca position on sustainable crops protection

Brussels, November 2019



Agricultural production

copa***cogeca**

european farmers

european agri-cooperatives



Our agricultural and food industry make the EU one of the world's leading producers of food, guaranteeing food security and providing millions of jobs to Europeans. EU farmers are also the number one custodians of the environment, as we take care of the natural resources on 48% of the EU's land.

Nowadays the world is facing a number of other challenges that threaten food security and society's wellbeing, including climate change, biodiversity loss and depletion of natural resources. Also, consumer demands are shifting with increasing welfare, including requirements with respect to the product itself (quality, diversity) as well as how it is produced (respecting the "One Health" concept and including humans, animals and environment). Feeding the world comprises thus an increasingly complex interaction between agronomic, environmental and economic values.

Furthermore, EU agriculture is already facing an increasing demand for food, feed and non-food outlet production, and we will continue to witness these demands in the future. It is also clear that we will have to cultivate with even fewer natural resources and probably facing new pests and diseases, for instance, derived from climate change effects, while also reducing greenhouse gas emissions and maintaining the same amount of productivity on the same amount of land. All of this to prevent additional soil degradation or deforestation.

Safeguarding plants and crops' health (e.g. food, ornamentals, seeds...) is, by principle, a cornerstone of all farming activities and modern arable farming in the European Union, irrespective of the production method (conventional, organic, etc.). As part of their job, **farmers may have recourse to Plant Protection Products (PPPs)** to grow healthy crops on competitive terms and ensure that consumer demands are met at the same time. Their day-to-day work, from which they earn a living in a very competitive market, involves providing safe food, feed and non-food agricultural products and safeguarding the environment. Also, the proper use of PPPs is an important tool in maximising yields whereby resources are used in the best and most efficient possible way, hence a lower carbon footprint for each produced unit. Besides, these PPPs support high quality agricultural production.*

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For Copa and Cogeca's future discussions on crops protection at EU level should address the following issues:

- 🐛 Integrated Pest Management as the standard in crop protection;
- 🐛 Equipping the farmers' toolbox: the authorisation of active substances and PPPs in the EU;
- 🐛 Minor Uses' and emergency use need for specialty crops;
- 🐛 Consumer awareness: key to the continuity of EU agriculture;
- 🐛 Providing food security;
- 🐛 EU agencies and their food safety standard guarantees;
- 🐛 Strengthening international awareness on high-value EU production standards;
- 🐛 New crop protection technologies needed for sustainable agriculture;

1. Integrated Pest Management as the standard in crop protection

As Copa and Cogeca, we continue to endorse and stimulate the availability and use of Integrated Pest Management (IPM) tools (Directive 2009/128 on Sustainable Use of Pesticides), in which the use of chemicals is the last resort in agriculture. These tools are already used in other parts of the world, not just in the EU¹.

By applying IPM, farmers are already avoiding an excessive use of chemical pesticides and they are increasingly moving towards low-risk substances and selective crop protection techniques. They combine various agricultural practices to reduce the impact of agriculture on the environment: crop rotation, implementation of resistant cultivars, soil management, seed protection, etc.

Nevertheless, PPPs will remain an essential element in IPM, although their share will continue to decrease towards the future. Adding to this the fact that low-risk substances and biopesticides still take a long time to become available on the market, while conventional PPPs keep having non-renewal decisions at EU level. In the end, this will only leave farmers' toolbox unable to fight adequately pests and diseases that affect their crops, with the consequent compromises to food supply and security toward consumers.

2. Equipping the farmers' toolbox: the authorisation of active substances and PPPs in the EU

Today, EU farmers and their cooperatives are confronted by multiple threats when safeguarding their crops, including pests, diseases and weeds, some of them worsened or created by climate change effects at global level. They need to be highly competent professionals with mandatory official training in safely applying PPPs, and must carry out regular checks on their crop protection equipment. Furthermore, their employees are also advised to follow the same strict rules in order to respect health and safety in the workplace. Moreover, there are strict controls on residues throughout the food chain.

Copa and Cogeca agree that PPPs' active substances must be treated like any other substance that may affect health and the environment, but always on a clear, science-based, transparent assessment. However, the European Commission still keeps only a hazard-based approach when talking about plant protection active substances, specially chemical ones. **We advocate for a science-based risk assessment where both hazard and exposure are taken into consideration.**

Without a safe and effective toolbox at hand, especially where farmers already use low levels of pesticides, it is scientifically proven that yields will be reduced², and therefore food security in the future will be threatened. Additionally, further reduction of PPPs use should neither put the economic position of the farmer at stake, nor undermine food safety, food security or consumer protection standards in any way.

Furthermore, costs and time needed to register new substances have increased significantly in the last few years, while many substances have not even been re-authorized. **For Copa and Cogeca, clear, transparent and swift procedures for the evaluation of new active substances, should always be guaranteed.** The authorization of low-risk substances and biocontrol tools has a too much complex and economically burdensome procedure which must be further simplified than what is already provided for in the Regulation (CE) 1107/2009.

Farmers should be equipped with the right

¹ Pretty, Jules & Bharucha, Zareen. (2015). Integrated Pest Management for Sustainable Intensification of Agriculture in Asia and Africa. *Insects*. 6. 152-182.

² In-depth analysis: Farming without plant protection products. Can we grow without using herbicides, fungicides and insecticides? (EPRS – STOA, March 2019)

toolbox which should be developed hand in hand with cutting-edge scientific progress. Therefore, farmers must be given available, safe, effective and affordable tools, sourced as much as possible from the EU crop protection industry (physical/mechanical, genetic, biological, natural, etc.) in order to treat our crops when necessary and be able to provide high-value and quality food and horticultural products (flowers, herbs) with EU origin.

3. Minor Uses' and emergency use need for specialty crops

EU farmers are very effective in producing speciality crops and supplying the market with a broad range of healthy and nutritious food. Due to the specialisation of farms and producers of these crops, a **limited or non-existent supply of options for weed, pest and disease control can cause serious economic losses for these farms, explained in particular by a loss of yield.**

We regret the fact that there is not yet a common EU approach to support this important niche market. For instance, different interpretations of the concept of 'minor use' impede harmonization among member states, causing inefficiencies and inequalities for EU farmers. These types of production do not have enough tools to defend themselves because for companies it is often not profitable to develop molecules for such small markets. This has a considerable impact on these sectors. In this respect, it would certainly be useful to also improve the procedures relating to the use of existing substances and those relating to mutual recognition.

The work of the European Union Minor Uses Coordination Facility (EUMUCF) has been and remains highly valuable to both farmers and the industry in order to tackle problems related to PPP availability for speciality crops. EUMUCF builds trust among national authorities and identifies needs and possible avenues for cooperation among Member States. Therefore, EU and Member States should recognise the need for adequate and continuous long-term financing and technical support for the EUMUCF.

4. EU agencies and safety standard guarantees

Farmers and agri-cooperatives have always supported the science-based risk assessment approach adopted by EFSA and we will keep doing it in the future. EFSA's assessment on active substances for PPPs always aims to guarantee the utmost protection of human, animal and environmental health. However, Copa and Cogeca have been lately noticing a widespread distrust in the science-based control system at EU level.

In this regard, we want first to reiterate that the EU has some of the highest food safety standards in the world and that the work of EU agencies in this regard should remain both science-based, independent, autonomous and adequately funded.

Secondly, we also recognise the difficulties faced by risk managers at the moment of weighing the many scientific, societal, economic, political and cultural inputs needed to reach a final decision on crop protection.

Therefore, as a way to speed-up the authorisation procedures for crop protection active substances and alternatives as much as possible, we would want to call upon the EU Institutions to further enlarge the risk analysis paradigm in a more holistic approach, and to therefore integrate in it both the science-based risk assessment the socio-economic impact assessment (SEIA).

We have to always keep in mind that, for EU farmers, the difference between having or not a tool available to protect their crops can make a huge economic difference, and it may ultimately lead to problem of food shortages for consumers; if we also consider our current context of global trade where other countries have tools unavailable in the EU. This creates an unlevelled playing field.

In summary, we envision a European Union where all different plausible scenarios have been considered and carefully analysed. The recent EFSA publication on the development of new "cumulative risk assessment" is welcomed in this regard, always considering the establishment of the assessment groups in a cautious and realistic manner. In this regard, we also would keep insisting to the European Commission to fully apply risk-based assessments instead of hazard-based assessments ('cut-off criteria').

5. Consumer awareness: key to the continuity of EU agriculture

All policy measures must recognise the wider services that farmers and cooperatives, as suppliers of quality and healthy food, feed and non-food agricultural products, provide to society. Therefore, Copa and Cogeca considers it important to boost communication with consumers on the good practices that farmers carry out on a daily basis in order to provide them with high-quality, safe and nutritious food.

European agriculture and the use of chemical PPPs are currently facing a lot of criticism from the general public, as a result of food safety concerns about its possible effects on environmental, human and animal health.

European citizens do not seem to be able to find enough clear, reliable and transparent answers to allay these concerns. It is therefore the task of the agricultural sector to be transparent about the way food is being produced, but it is also the duty of EU institutions to help delivering these transparent messages to the final consumers, always supported by trustworthy data.

Farmers are producers of food, and this central role must also be better communicated to consumers as well. Copa-Cogeca welcomes the acknowledgement of the need to provide consumers and the public with appropriate information on how their food is produced.

However, Copa and Cogeca would like to remark that it is also essential for farmers to be able to recover their additional production costs from the market. However, this requires consumers to be aware of **farmers' responsibilities and willing to pay for additional sustainability measures that go beyond legislation. Copa and Cogeca believe that, in reality, the high-quality production standards present nowadays in the EU agricultural production are not always evident for EU consumers. Although some of them are willing to pay a premium for higher production standards, there is no clear evidence that this premium is passed on to farmers and integrated into their income.**

We also believe that the associated economic and/or administrative burden to the further improvement on agri-production standards must be shared in a balanced way throughout the whole plant production value chain (PPPs industry, processors, primary producers, etc.). If farmers cannot protect crops properly

and effectively, consumers will ultimately be impacted by a scarcity of food products which would also likely be of poorer quality than nowadays. **Based on the latest research, it is clear that a smaller and/or ineffective crop protection toolbox will not only affect crop yields⁴, but also increase insecurity in the coming years which will be marked by challenging farming conditions⁵.**

We need also European consumers to understand some of the reasons why EU plant-based agricultural products are more expensive than some third country imports. Products coming from some third countries many times have lower production costs and standards than those produced in the EU.

6. Strengthening international awareness on high-value EU production standards

It should be guaranteed that products entering the European Union, regardless of the country of origin, meet EU food safety standards. Furthermore, meeting the demand for higher standards in agriculture sometimes entails higher investments and production costs for EU farmers. This should be taken into account. The EU should therefore ensure that those investments are supported by EU expenditures. The European Commission should heighten awareness of the existing sustainable and high-quality crop production standards, along with the requirements met by European farmers, regardless of the production system. When negotiating a trade agreement, the EU should look for alignment of third countries on agricultural production standards, if these countries want to export to the EU. Regarding PPPs authorisations, in the European Union we must prevent the creation of an unlevelled playing field for our farmers regarding international trade. **Therefore, the arrival of products treated with active substances that are not approved for their use in the European Union would be very detrimental to our economy and would seriously hamper the competitiveness of our farmers.**

7. New crop protection technologies needed for sustainable agriculture

For Copa and Cogeca, innovation is essential for the European agricultural sector to remain competitive and environmentally sustainable

⁴ In-depth analysis: Farming without plant protection products. Can we grow without using herbicides, fungicides and insecticides? (EPRS – STOA, March 2019)

⁵ Feeding a growing world: The case for sustainable agriculture (Oxford Analytica, 2019)

in a globalised market. Funding for the promotion of environmental sustainability of EU production should be increased within the existing EU scheme for the promotion of EU agricultural products.

a) Activation of existing knowledge at farm level

In the context of changing current agricultural practices, the first issue to tackle is identifying farmers' specific needs in advance in order to bridge the gap between science and practice. For instance, being able to replace an active substance that has been assessed negatively by EFSA, with new sustainable solutions that will assure farmers safe and effective production.

These alternatives, which may have less of an impact on the environment and reduce risks for applicants, should to be seen as a combination of solutions, such as innovative agronomic practices, digitalisation, resilient varieties or the research for new agricultural markets.

Nevertheless, we have to keep in mind that all the alternatives that may come to the agricultural market must be procurable for farmers. For a lot of farmers, it is still difficult to afford some of the new tools already available: e.g. robotised weeding machines that are too expensive and require so high investments that they won't return but after a lot of years. Such investments, for now, are not cost-effective for producers.

b) Innovation for sustainable farming

Farmers and agri-cooperatives are already investing and applying innovative solutions to keep their businesses competitive and sustainable, to better manage natural resources, to deliver goods and services to the consumers, to adapt to the effects of climate change on agriculture and to respond to societal demands.

Nevertheless, despite the interest of EU farmers to apply low-risk PPPs and other sustainable technologies, proper availability of such products is still far from envisaged (slow authorisation procedures, lack of affordability for farmers...). For the EU farming community it is crucial that investments keep going into in this area to bring to the market affordable, effective and safe products which may be adapted to the EU agricultural system and

circumstances. We must keep insisting on research into and the development of these alternatives for their application through IPM schemes, based on existing scientific literature and the wealth of knowledge collected by EC research programmes (FP7, H2020).

This knowledge must be directly and adequately transferred to farmers. These new alternatives would allow for an increase in quantity and quality of agricultural output while using fewer but more precise inputs. It is necessary to invest in research and development, both for new active substances with better eco-toxicological profiles and for resilient varieties that may help to reduce the use of PPP inputs to protect crops.

We must therefore ensure that in this ongoing agro-ecological transition, these research results are made available, and can be translated into innovative and readily applicable tools for farmers. Therefore, specific research programmes (e.g. precision farming) must be financed, taking into account the differences in crop production and climatic regions around the EU.

c) Digitalisation

Digital business model patterns have now become relevant in physical industries. Indeed, farming processes have become increasingly automated, connected and integrated, leading to the creation of data management models and a re-definition of the farmer-supplier-consumer relationship.

We must encourage the exchange of information between stakeholders within the food chain through thematic networks and other digital platforms, while also ensuring data protection (e.g. personal data of farmers, researchers, workers, etc.). We need to make sure that the farmer gets a return in terms of the value created and can access their data collected by the public administration.

However, digitalisation of agriculture is not just about data, control and traceability but also about "Precision agriculture" (PA). PA is a successful applied concept based on information gathering, analyzing, making decisions and acting accordingly, variability in crops, forestry and livestock. The start was the use of satellite imagery in the 70s and GPS in the 90s, Precision agriculture provide the tools and knowledge for farmers to take more precise and sustainable decisions. Relevant information is not limited to the field⁶. Digital

⁶ Crop yield, terrain features/topography, organic matter content, moisture levels, nitrogen levels, pH, etc

tools allow to combine field data with multiple sources such as: digital decision-making, spot treatment, GPS, satellite or drones images, input suppliers data, weather data, etc. Digital transformation empowers farmers with decision making support and accelerates farmers knowledge and their ability act and adapt.

d) Better genetic material and resilient varieties

Plant breeding may make a major contribution to current and future challenges faced by EU agriculture. We must therefore explore the possibilities provided by both breeding more resistant varieties through classical breeding or through plant breeding innovation techniques. Free access to genetic resources should be safeguarded in order to make use of its full potential and facilitate the development of resistant and resilient crop varieties.

New Breeding Techniques (NBTs) are very important tools to support innovation in the plant breeding sector. They offer many new possibilities and are evolving rapidly. By permitting a greater use of genetic variability and a better use of existing genetics, NBTs can provide solutions to the numerous challenges that European agriculture is facing.

NBTs allow breeders to make the selection of traits that cannot be obtained in conventional breeding available (e.g. wheat powdery mildew resistance). NBTs help to develop varieties that use fewer inputs, improving the quantity and consistency of yields, adapting to climate change, producing sufficient and high-quality food, and diversifying crops for production in order to optimise crop rotations. NBTs go hand in hand with other technological developments, such as precision farming, digital farming, robotisation, and bio-control. However, each NBT should be analysed and discussed by experts on a case-by-case basis and according to strict scientific criteria. Copa and Cogeca therefore reserve the right to express their possible positions on these new techniques on a case-by-case basis. Either way, along with big breeding companies, for local and regional sorts it would be important to keep also existing smaller breeding companies.

Our aim for the future

In conclusion, Copa and Cogeca would like to stress that:

- ✓ **Farmers need safe and effective tools to combat pests and diseases so as to guarantee both food safety and security for the current and future world population;**
- ✓ **The agricultural sector should be strong enough to show consumers that it is ready to meet their varying demands on agricultural products, by adapting its practices in general and above all plant protection practices;**
- ✓ **We should ensure both economic and social stability for producers when societal demands are met;**
- ✓ **EU Farmers who apply more measures than those required by legislation should be appropriately remunerated for it, and the added value for the ecosystems that EU farmers provide by applying these extended measures should be always recognised by both society and institutions, inside and outside the EU;**
- ✓ **The involvement of farmers in decision-making processes may help to bridge the gap between researchers and farmers and to find widely shared solutions that would ultimately be perceived as feasible new opportunities to improve productivity.**
- ✓ **An increased investment on research and innovation at EU level may allow EU farmers to go further on environmental sustainability of their production and should be always encouraged.**



Copa and Cogeca are the united voice of farmers and agri-cooperatives in the EU.

Together, they ensure that EU agriculture is sustainable, innovative and competitive, guaranteeing food security to half a billion people throughout Europe.

Copa represents over 22 million farmers and their families whilst Cogeca represents the interests of 22,000 agricultural cooperatives. They have 66 member organisations from the EU member states.

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