

POSITION

Brussels
July 22, 2002
D/01/CM/11052

**ECPA Position on proposals for a
quantitative reduction in the use of
crop protection products**

ECPA Position

The European Crop Protection Association (ECPA) is the Brussels-based trade association that represents the crop protection industry in Europe. Its membership consists of market-leading companies as well as national associations in 24 countries including Central and Eastern Europe.

ECPA strives to create awareness of the European crop protection industry's contribution to sustainable agriculture and the quality and safety of our food. The crop protection industry is already heavily regulated in the EU, and additional policy instruments are being created.

With regard to crop protection products (CPPs), there is a discussion in Europe on initiatives aimed at further reducing potential risks of CPPs usage on human health and the environment.

In some cases this discussion leads to suggestions for a simply arbitrary (quantitative) use reduction as a means of further reducing risk.

ECPA supports the philosophy of further reducing risks from the use of crop protection products. However, ECPA strongly believes that an arbitrary (quantitative) use reduction is not the right measure to further reducing the risks associated with the use of crop protection products and to achieving the sustainable use of crop protection products.

Under Council Directive 91/414/EEC, concerning the placing of plant protection products on the market, all crop protection products within the EU are comprehensively regulated. Each product has to fulfil a high safety and regulatory standard before an authorisation is granted in the EU. More than 100 specific tests of a product's environmental and health impact must be completed to show that it presents no unacceptable risks to people and the environment. This is both in line with increasing scientific knowledge and increased demand for higher health and safety standards. The current regulatory process is considered by many nations around the world as the regulatory model by which all others may be judged.

Directive 91/414/EEC clearly states that only products are authorised which, when used properly,¹:

- have no unacceptable effect on plants or plant products;
- have no harmful effect on human or animal health, directly or indirectly, or on groundwater;
- have no unacceptable influence on the environment.

The Directive also states that the provisions governing authorisation must ensure a high standard of protection and the protection of human and animal health and the environment should take priority over the objectives of improving plant production.²

ECPA strongly supports this process and is confident about the mechanisms in place – at both the EU and Member State levels – for determining which products are safe to use.

However, while risk minimisation clearly includes a scientific and technical dimension, it also involves risk management at the user level.

¹ Council Directive 91/414/EEC of 15 July 1991 concerning the placing of plant protection products on the market, article 4.

² Council Directive 91/414/EEC, 9th whereas.

An adequate further reduction in the risks associated with the use of crop protection products should start where action can be taken most effectively, thus with the appropriate usage of crop protection products and not with a mandatory reduction of their use.

ECPA believes the way forward is for further measures to ensure the appropriate use of crop protection products.

The European crop protection industry already advocates a socially and environmentally sensitive use of crop protection products that goes well beyond the requirements of the law and is active in schemes to improve practices at the user level.

Reduction in the risk associated with the use of CPPs can be achieved through a number of mutually reinforcing elements. These include improved application technology, regular inspections of equipment, improved user education and the adoption of integrated techniques such as Integrated Pest Management (IPM) and Integrated Crop Management (ICM).

These approaches were also reflected in the outcome and recommendations of the Second Workshop on a Framework for the Sustainable Use of Plant Protection Products in the European Union, held in 1998, in Brussels³.

Industry promotes the responsible use of crop protection products within the holistic approach of ICM. This approach integrates all farming methods and practices with the aim to prevent or reduce pest pressure. Should users opt for chemical control, they need to choose the right product carefully and apply the principle of "as little as possible but as much as necessary". Accordingly, ECPA has developed a training module on ICM and guidelines on the sustainable use of crop protection products.

ECPA believes that apart from industry initiatives promoting best practices in crop protection, more horizontal measures such as information campaigns, training and education initiatives need to be fostered and financially supported to improve crop protection practices on a Europe-wide basis.

User reduction cannot be defined as a prerequisite for risk minimisation, but a risk reduction concept may also have a reduction of the use of crop protection products as its consequence.

Conversely any mandatory use reduction scheme based on simple quantitative parameters would draw the focus away from the point where action can most successfully be taken to achieve further risk reduction.

Mandatory user reduction programmes do not consider qualitative aspects of crop protection products like their environmental properties and are thus not in accordance with Integrated Pest Management and Integrated Crop Management. Furthermore they completely neglect the economical and technical aspects of crop protection.

It seems appropriate in this context to recall the overall benefits of crop protection products and the reasons why they are being used:

³Proceedings of the Workshop held in Brussels, May 1998, Internet address: <http://europa.eu.int/comm/environment/pps/home.htm>.

- CPPs ensure yield and prevent quality losses (due to pests, diseases, weed etc.), and they are therefore beneficial to the financial income of users.
- CPPs ensure a consistent high quality of the harvested produce, thus benefiting the consumers.
- By protecting from yield losses, crop protection products also ensure that production factors and inputs are used efficiently during the production process. This in return prevents those production factors and inputs from being wasted.
- CPPs allow for farming operations benefiting the environment, such as reduced cultivation methods.
- CPPs contribute to the overall economy (production, distribution, research and development, etc.).

In quantitative terms, there has been a reduction in CPPs used over the last ten years across the EU. This reduction was mainly due to technological innovation like novel chemistry, and improved application technology; and the review of existing active substances is surely contributing to it.

Short term, the impact of approximately 330 substances disappearing from the market in 2003 should be thoroughly assessed, before embarking on any user reduction programmes.

Furthermore, crop protection products are a purchasable input and the reality of economics of farming today directs farmers to use input efficiently. Using more than needed would be economically unreasonable.

Considering the above, an arbitrary further restriction of the use of crop protection products (quantitative by volume or number of applications), could have serious repercussions not only on the farming sector but also on the economy in general, whilst the benefits to the environment and the consumer are questionable:

- The whole downstream (machinery, fertiliser) and upstream sector (food processors, food distribution, food markets) would be affected with potential consequences for jobs.
- Agricultural yields would drop, leading to income losses for the farming community.
- Yields would depend solely on climatic and local conditions, which would endanger a continuous supply of raw material and food at affordable prices to the consumer.
- Food quality losses can be envisaged.
- Agricultural exports would drop due to lower production and quality deficiency.
- There is a risk that food prices would increase as a continuous supply of the same quality and quantity of produce can no longer be guaranteed.
- More land would be required for agricultural production to balance food/raw material supply and demand. This would deplete natural resources.

Studies analysing the impact of a reduction in the use of crop protection products on the agriculture-food sector and economy quantify this⁴.

⁴E -C. Oerke, H -W. Dehne, F. Schönbeck and A. Weber, Crop Production and Crop Protection.

In a recent study,⁵ which assessed the impact on the European food and agriculture industry of an imposed 75% reduction of crop protection products in the EU, the following results were calculated:

- a €10 billion reduction in revenue for European farmers and the food industry;
- a €45 billion total welfare loss in the EU;
- a severe impact on European agricultural production with wheat and coarse grains production falling by around 40%, the production of oilseeds by 50% and the production of fruits and vegetables falling by 32% on average.

All this provides evidence that a quantitative arbitrary use reduction is not a sustainable solution. The most appropriate way to further reduce risks is for measures aimed at ensuring that the highest possible standards are applied to the use of crop protection products. To maximise the positive effects of improved standards these measures should ideally be adopted and targeted to the specific situation at the point of use.

⁵ Prof. Dr P. Michael Schmitz, Institut für Agrarpolitik und Marktforschung, Justus-Liebig-Universität Gießen, Cost-Benefit study of plant protection products.