

Farmers' perspective on the evaluation of the Sustainable Use of Pesticides Directive

Pedro Gallardo
COPA-COGECA Vice President
President of the Working Party on Phytosanitary Questions
Evaluation of the Sustainable Use of Pesticides Directive

19/01/2021

copa***cogeca**
european farmers european agri-cooperatives

copa

european farmers



cogeca

european agri-cooperatives

Created in **1958**

22 million European farmers and family members

60 full members from the EU Member States and 36 partner organisations

Created in **1959**

22,000 European agricultural cooperatives

35 full members from the EU Member States, 4 affiliated members and 36 partner organisations



In **1962**, a joint Secretariat was created, making it one of the largest and most active organisations in Brussels for the past **60** years.



Mission

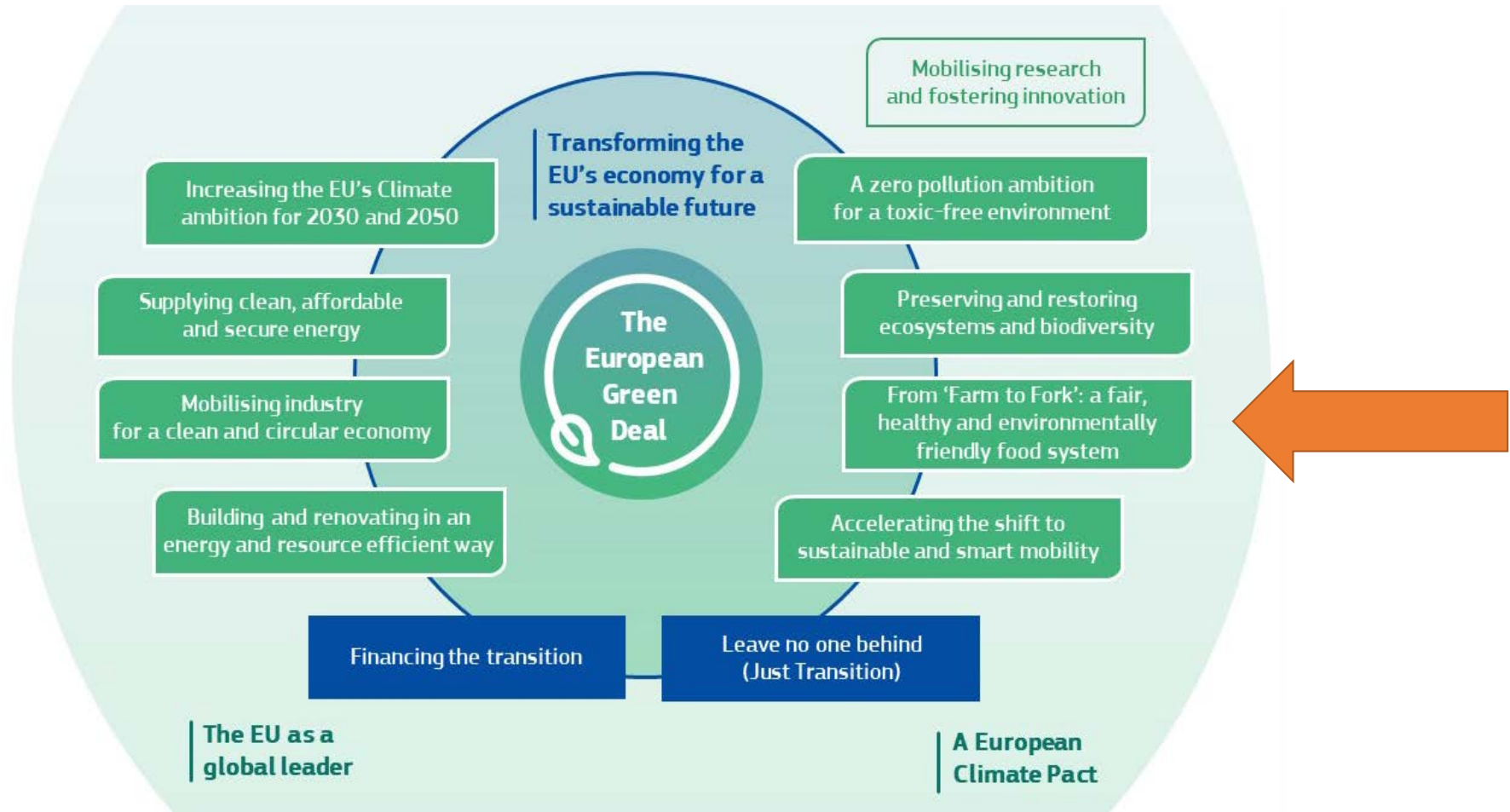
To ensure a viable, innovative, competitive EU agriculture and agri-food sector guaranteeing food security to half a billion people throughout Europe.



Objective

Promoting European farmers and agri-cooperatives views to **influence** EU decision-making process and public opinion.

What is coming in the new Green Deal?



Green Deal and Farm to Fork Strategy

- “The strategic plans will need to reflect an increased level of ambition to **reduce significantly the use and risk of chemical pesticides**.”
- The Commission will **identify the measures**, including legislative, needed to **bring about these reductions** based on a **stakeholder dialogue**.
- The EU needs
 - to develop **innovative ways** to protect harvests from **pests and diseases**
 - and to consider the potential role of **new innovative techniques** to improve the sustainability of the food system, while ensuring that they are safe.”

The European Green Deal (Communication from the Commission, 11/12/2019)



Farmers are ready !



Copa and Cogeca's position on sustainable crop protection and the Sustainable Use Directive (SUD)

- * **Safeguarding plants and crops' health** is a cornerstone of all farming activities and modern arable farming in the EU, irrespective of the production method (conventional, organic, etc). As part of our jobs, farmers may have recourse to PPPs to grow healthy crops on competitive terms and ensure that consumer demands are met at the same time. A 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.
- * PPPs support high quality agricultural production. 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 reduced, and therefore **food security** in the future will be threatened.
- * We farmers are the **most interested** in having safe production conditions that respect the environment, the animal welfare, and the natural environment, to offer top quality products, with maximum health guarantees and at affordable prices, as well as contributing to the conservation of our soils, the quality of our waters and the diversity of our flora and fauna.
- * By applying stringent EU regulation on pesticides, the EU Member States have **reduced the number of active substances by over 50%**, with 25% of current actives recognised as low-risk ones.



Copa and Cogeca's position on the evaluation of the Sustainable Use of Pesticides Directive

Article 1- Subject matter

- * In most Member States, measures are already in place to reduce the risks and impacts associated with the use of plant protection products. The Framework Directive needs to acknowledge this in a clearer way to further reduce risks.
- * The scope of this Directive should also include as an objective the necessity of a sustainable use of pesticides is also to meet consumer demands and achieve a sustainable income for farmers.



Copa and Cogeca's position on the evaluation of the Sustainable Use of Pesticides Directive

Article 4 - National action plans

- * National authorities are best positioned to identify the appropriate measures to be taken, adapted to national, regional or local needs.
- * National action plans should focus on risk reduction only - and not on volume nor on the risk of dependence as this is incompatible with the continuously smaller number of PPP available on the market.
- * Moreover, these national plans should be adapted to the specific conditions of each Member State.
- * When setting these national plans, the consultations with the representatives of the industries, distributors and users, directly concerned with these measures, must be started by the national authorities.



Copa and Cogeca's position on the evaluation of the Sustainable Use of Pesticides Directive

Article 5 – Training

- * Training requirements are essential and should be based on the existing programmes already in place at national level. Therefore, only basic training requirements – adapted to different target groups (i.e. users, distributors, advisors) should be provided for in the Directive.
- * Moreover, as a professional user, the farmer's professional knowledge and experience must be taken into account.



Copa and Cogeca's position on the evaluation of the Sustainable Use of Pesticides Directive

Article 7 - Awareness programmes

- * Objective information dissemination to the general public should not only cover environmental and health aspects of PPPs, but should also encompass messages as to why they are used and their benefits .
- * Farmers are producers of food, and this central role must also be better communicated to consumers as well .
- * 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 .
- * The European Commission should heighten awareness of the existing sustainable and high -quality crop production standards . When negotiating a trade agreement, the EU should look for alignment of third countries on agricultural production standards, in the European Union we must prevent the creation of an unlevelled playing field for our farmers regarding international trade .



Copa and Cogeca's position on the evaluation of the Sustainable Use of Pesticides Directive

Article 9 - Aerial Spraying

- * We are opposed to a general ban on aerial spraying .
- * Aerial spraying can be the most suitable application method in some circumstances and cannot be replaced by other application techniques of crop protection (forestry , rice and wine sector) .
- * Given the actual location of the pest problem , the height of the crop , the geographical relief , the access to the crop or in case of risks of epidemics to ensure the maximum safety during the application , while at the same time providing a level playing field for professional PPP users , would be more useful than a general prohibition with subsequently numerous necessary , highly bureaucratic derogations .



Copa and Cogeca's position on the evaluation of the Sustainable Use of Pesticides Directive

Article 10 - Specific measures to protect the aquatic environment and limiting drift

- * The protection of all water bodies and aquatic environments is dealt with by the Water Framework Directive and associated Regulations .
- * In any case, the wording of this article takes insufficiently into account of the authorisation process which results in providing specific instructions on the way a chemical can be applied and stored to minimise its impact . Particular attention should be however drawn to the fact that protection of aquatic environment relates essentially to the nature of the soil .



Copa and Cogeca's position on the evaluation of the Sustainable Use of Pesticides Directive

Article 13- Integrated Pest Management (IPM)

- * By applying IPM, farmers are already avoiding an excessive use of chemical pesticides and they are increasingly moving towards low-risk substances
- * PPPs will remain an essential element in IPM. Adding to this the fact that low-risk substances still take a long time to become available on the market, so we should avoid that 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.



Copa and Cogeca's position on the evaluation of the Sustainable Use of Pesticides Directive

Article 14 – Indicators

- * 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 .
- * European Commission still keeps only a hazard-based approach when talking about plant protection active substances .
- * We advocate for a science-based risk assessment where both hazard and exposure are taken into consideration .
- * We support the science-based risk assessment approach adopted by EFSA that aims to guarantee the utmost protection of human, animal and environmental health .
- * The EU has some of the highest food safety standards in the world .



Conclusions

- * PPPs remain as **indispensable tools** for farmers, as they are part of the range of integrated crop protection solutions. Banning synthetic chemical pesticides without having a feasible alternative will lead some agricultural production to a dead end.
- * Farmers are constantly **adapting to the aforementioned challenges**, developing new ways to address the problem through agronomic practices, precision technologies, and plant breeding.
- * We would want to reiterate **that new plant breeding technologies** have a role to play in reducing the need for the application of conventional pesticides. Therefore, regulation must be adapted to allow these technologies to be adequately developed and implemented in the EU. **There is an urgent need of an updated interpretation of the mutagenesis exemption in Annex 1.B. of the Directive 2001/18/EC.**





Thank you for your attention !

Pedro Gallardo

@pitgallardo

pitgallardo@gmail.com



www.copa-cogeca.eu