

ECPA position on the Commission's Farm to Fork strategy

Introduction

The Farm to Fork strategy seeks to improve sustainable food production and consumption with a holistic approach. Climate change mitigation is a key issue that we must all collectively address. As an Industry that supports farmers and food production, we commit to playing our part in the Commission's ambitions to find sustainable solutions.

We believe mitigation of climate and biodiversity crises need to be seen in a global perspective, where the EU does not export the problems, while at the same time putting food security at risk. Policy approaches must be ambitious, coherent and enabling. They must deliver on climate change mitigation and biodiversity enhancement, whilst ensuring the viability of European agriculture and a resilient supply of safe and sustainable food for all. These are not mutually exclusive goals and can be achieved with a balanced, science-based approach.

Key points

- ECPA strongly believes that **innovation is a key part of the solution**. Our companies will continue investing in innovative ways to protect crops: with huge investments into pesticides that have a more environmentally friendly profile, biopesticide solutions and precision technologies for sustainable agriculture. The uptake of digital farming technologies should be **incentivised through measures, such as the Common Agricultural Policy**, which support farmers in further optimising the decision-making in crop production.
- Improved implementation of existing legislation could help adaptation to climate change and bring new technology to the market to deliver sustainable agriculture. We are concerned that the European regulatory and policy environment is **less and less open to the development and application of innovation in the crop protection sector**, and that in a foreseeable future, **European farmers will continue to lose tools** faster than new ones can be found. Overall chemical and biological active substances have to be considered as complementary tools, rather than a direct replacement of one over another. Recent research shows significantly lower yields (10-40%) for seven staple crops if a large portfolio of substances were to be removed¹.
- The EU's **authorisation procedure for pesticides is one of the most stringent** in the world providing the highest quality foods to EU citizens. Nevertheless, we recognise societal concerns about food production and we acknowledge the Commission's willingness to reduce both the risk and use of pesticides. **We are open to discuss a reduction target, providing it is science-based and realistic. The proposed reduction rate of 50% is not realistic** and will not have the desired effect of having a more sustainable food production model in Europe. **We would welcome realistic targets reflecting the results of an impact assessment**.
- While this will be very challenging for us to deliver on, and although imperfect, the **Harmonised Risk Indicator 1 (HRI1) seems to be a reasonable way to measure the hazard reduction of pesticides**. To further improve the HRI1 the Commission should consider an indicator for agricultural productivity. It is important to ensure food supply is secure and resilient in general and in times of crisis.
- Our industry supplies solutions to all agriculture models, from organic to conventional. We support the Commission's aim to increase organic production as far as it is driven by growing consumer demand and as long as it does not lead to unintended land use changes in other parts of the world that might have substantial detrimental effects on biodiversity and climate. **It is important to note the ecological trade-offs involved**: organic production is characterised by a significantly lower yield output² and key pesticides approved for organic agriculture are often used in much larger quantities than other chemical pesticides. For this reason, **any target must be based on science**

¹ Kim, R., van Drunen, A & Boogers, N., (2020), *Low Yield II: Cumulative impact of hazard-based legislation on crop protection products in Europe*, Available: https://issuu.com/cropprotection/docs/low_yield_report_ii

² *ibid*

and consequences gauged beforehand. We are convinced that **an impact assessment is needed**, that looks into the impact of growing organic production for food security and that examines the effects on third countries. Stimulating sustainability in farming should be focused on farm performance rather than on farm type

Additional information

Reduction target for pesticides

- We hope for a well-reasoned, **science-based discussion** with the European Institutions focused on **coherent, evidence-based policy instruments**.
- HRI targets should be based on 2014-2017 as a **baseline average** to ensure peak pesticide use is included in the benchmark, as well as varied use times (usage can change a lot due to climatic conditions, disease and pest pressure).

Increase in organic farming

- It should be considered that **due to these lower yields more agricultural land would be needed** to maintain the same amount of food. The potential for increase in greenhouse gas emissions due to more tractor use in fields, and the potential to drive land use change outside of Europe should be considerations too.
- We believe **that a truly holistic approach is needed to balance these tensions** and achieve the climate action that is needed whilst preserving farmers' capacity to produce enough food.

Data and digital farming

- We support the Commission's goal to update the rules on data about the use of pesticides to overcome existing data gaps. **Adequate data will reinforce evidence-based policymaking, informing impact assessment on legislative proposals** – it's vital that what is proposed now by the Commission will deliver for the environment, there will be no second chance and evidence is needed to make sure the approach is correct.
- ECPA recommends that the Commission **explore using the newest digital technologies** that can act as the main catalysts in order to gather these data and to allow farmers to concentrate on their main roles, stewarding the land to produce safe and high-quality food for European citizens.

Counterfeit and illegal PPPs actions

- ECPA welcomes the Commission's call to increase and **broaden enforcement efforts³ to better control production, import, trade and use of counterfeit or otherwise illegal pesticides** and to strengthen investigative capacities of the European Anti-Fraud Office (OLAF).
- ECPA welcomes the **excellent work that has been carried out by Europol and OLAF via their Silver Axe Operation**, seizing 1222 tonnes of illegal or counterfeit products since its launch⁴. However, we recognise opportunities to improve the operation, including **broader scope and higher frequencies of inspections at ports, borders and in marketplaces, following existing best practice** examples from Member States. This could be achieved, as suggested by the Commission, through the empowerment in the context of Regulation (EU) 2017/625 on official controls.
- The Commission should **ensure that violations of pesticide regulations are consequently prosecuted** in all member states, that seized counterfeit or illegal pesticides are stored safely and that capacities are available to destroy such products in compliance with safety standards.
- There is a need to have a simple and effective approach in all countries to encourage enforcement and regulatory authorities to partner with industry in **raising awareness of farmers and the legitimate distribution channel** to make them more resilient to repel criminal offerings that jeopardise sustainable production.

³ Report on the REFIT evaluation of the pesticide legislation, available at: <https://ec.europa.eu/transparency/reqdoc/rep/1/2020/EN/COM-2020-208-F1-EN-MAIN-PART-1.PDF>

⁴ Europol, (2019), 'Operation Silver axe strikes for the fourth time seizing over 550 tonnes of illegal pesticides', press release. Available at : <https://www.europol.europa.eu/newsroom/news/operation-silver-axe-strikes-for-fourth-time-seizing-over-550-tonnes-of-illegal-pesticides>