

ECPA position on the Biodiversity Strategy 2030

Introduction

To achieve the CBD's 2050 Vision to "Live in Harmony with Nature", the Commission has laid out in this Biodiversity 2030 strategy a clear set of commitments to put the EU on a path to recovery for the benefit of climate and people by 2030.

In this position paper we will be addressing the key points of interest in this document for our sector.

Key points

- **ECPA welcomes the European Commission's Biodiversity Strategy for 2030, biodiversity is an urgent and important issue** in agriculture and our Industry is fully committed to playing its part in supporting conservation, ensuring minimal impact on biodiversity in agricultural and associated landscapes, with regeneration and enhancement of biodiversity where possible. **Our Industry will continue to play a key role, supporting farmers as stewards of agricultural land.**
- We strongly believe 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.
- 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.**
- **Biodiversity protection is a key principle already enshrined in the approval legislation for all pesticides in Europe** including biopesticides. Regulation 1107/2009 is crystal clear that to be approved a pesticide "...shall have no unacceptable effects on the environment, having particular regard to...its impact on biodiversity and the ecosystem."
- Agriculture inevitably changes biodiversity in a given area by planting crops in higher density than would ever happen naturally. As stewards of the land, **farmers play a key role and work hard to minimise biodiversity loss** through responsible management of the landscape. Good Agriculture Practices, which include Integrated Pest Management (IPM), maintain key provisioning, regulating and supporting of ecosystem services delivered by biodiversity. These services play a key role in support of resilient and efficient cropping systems. We offer innovative **solutions and training schemes for farmers**, encouraging the implementation of these IPM practices and the creation of **non-crop habitats to enhance biodiversity and resilience**.
- 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 output¹** 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 and consequences gauged beforehand. We are convinced that an impact assessment is

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

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

Sustainable farming systems to support biodiversity

- ECPA support the Commission's ambitions to address the main causes of biodiversity loss through a set of EU Commitments, based on evidence. While this industry and agriculture must and will play a full part in biodiversity work, **it is important to take a holistic approach that considers all factors related to biodiversity loss**, especially urbanisation that drives land-use change and loss of habitats, intensive agricultural management practices, diseases, climate change and invasive alien species. ECPA supports the drive towards more sustainable agricultural practices.
- We believe it is essential to **reinforce the control mechanisms available for use against invasive alien species** that can have a devastating impact on European ecosystems and biodiversity. **Pesticides are an important tool for managing these species.**
- We support the commitment to promote sustainable agricultural practices based on IPM principles under the Sustainable Use of Pesticides Directive 2009/128/EC. IPM could be further improved through the adoption of the latest precision farming technologies, which ensure the most efficient protection of the crop while benefitting biodiversity and the environment. **We encourage the European Institutions to integrate, enable and promote the uptake of precision and digital agriculture, including via financial incentives and the Common Agricultural Policy.**

Protecting animal and plant species, soil and water

- ECPA fully supports the objectives of having **more efficient implementation and targets for the number of species protected** under the Habitats and Birds Directive.
- We support the need to reintroduce more landscape features and non-productive areas to help populations of animals and plant species, including pollinators and pest antagonists. In cases where productive agricultural land is taken out of production to enhance biodiversity, **CAP tools will be necessary to support farmers. Food supply and resilience must also be taken into account.**
- **Protection of soil is of paramount importance.** We fully support the need to enhance the situation and avoid land degradation. Farming practices also have an important role to play here, for instance limiting excessive ploughing in accordance with no-till, low-till or conservation agriculture.
- **ECPA is supportive of better implementation of the Water Framework Directive (WFD).** Good progress has been made on the status of EU rivers vis-a-vis trace level pesticide presence. In the WFD fitness check, the Commission clearly states that the Directive was successful in slowing down deterioration².
- ECPA fully **supports the commitment to increasing managed green spaces in urban areas.** These are essential for EU citizens. We understand the limited value in terms of biodiversity per se in those spaces but the various benefits as listed by the strategy makes it an important commitment (quality of life, refuge for species, air/soil/water pollution reduction).
- We understand the societal concerns over the use of our products in areas used by the public, however, these **products fulfil various needs and are only authorised according to stricter requirements.** There is no evidence to show that a further restriction in those areas would benefit biodiversity.

² European Commission, (2019), Fitness Check of the Water Framework Directive and the Floods Directive. Available at : [https://ec.europa.eu/environment/water/fitness_check_of_the_eu_water_legislation/documents/Water%20Fitness%20Check%20-%20SWD\(2019\)439%20-%20web.pdf](https://ec.europa.eu/environment/water/fitness_check_of_the_eu_water_legislation/documents/Water%20Fitness%20Check%20-%20SWD(2019)439%20-%20web.pdf)