

# ECPA position on Organic Action Plan Roadmap

The European Crop Protection Association (ECPA) represents the manufacturers of crop protection products providing pesticides and biopesticides for all models of agriculture, including organic. As ECPA members provide a large share of the EU-approved pesticides used by organic farmers, we welcome and support the development of the organic sector at EU level.

The Action Plan for the development of organic agriculture, aiming at fulfilling the objective of increasing the EU organic agricultural area to 25% as set out in the Farm to Fork and Biodiversity strategies, should be based on robust impact assessments in line with EU better regulation policies.

These impact assessments should be evidence-based, properly identifying trade-offs to determine policy options that truly support more sustainable and resilient agriculture in Europe. In particular, we believe the following aspects will require careful consideration.

## 1. Trade-off between organic and conventional agriculture

The co-existence of different farming systems is important as diversity is key to both food system resilience and sustainable development. There is no one-size-fits-all solution to the many sustainability and agronomic challenges farmers are facing. Stimulating sustainability should be focused on farm performance and biodiversity improvement outcomes, rather than on farming model.

Organic production is characterised by a significantly lower yield output than that of conventional production, with ranges of up to 34% lower yields<sup>1</sup>. Encouraging the uptake of organic farming will increase the need for more agricultural land to produce the same amount of food, which may have an impact on the environment and biodiversity conservation. Or, if the same land is available, then questions of food system resilience need to be addressed given the lower yields and reduced ability to control pests and diseases in the organic model. Coherence with other policy objectives, such as pesticide risk and use reduction target, should be taken into consideration.

Pesticides used in organic agriculture do not automatically pose less risk to human health or the environment compared to those used in conventional agriculture and are often used in substantially higher volumes. For example, copper compounds (the most common fungicide used in organic agriculture) are authorised for use rates up to 28kg per hectare over 7 years and are candidates for substitution based on copper being persistent in the environment and having acute toxicity to aquatic organisms<sup>2</sup>. This compares with other fungicides not approved for organic use that can be used at levels of tens to hundreds of grammes per hectare and are not candidates for substitution. In short, increasing organic land area will lead to increased use and risk from some pesticides.

## 2. Ensuring farmers access to effective solutions

When assessing the obstacles for greater organic production, it is important to consider food safety, pest and disease pressures that farmers face, how these vary depending on crops and local parameters, and the feasibility of producing profitably under organic requirements as it implies a number of restrictions on availability of productivity tools such as crop protection solutions.

Organic farmers, much like their conventional counterparts, need effective solutions to protect their crops and to control food safety risks from natural fungal infections that result in highly toxic mycotoxins, for which the EU rightly sets strict limits. The deployment of biopesticides could be further enabled at EU and national level, with proportionate data requirements and appropriate regulatory guidance.

<sup>1</sup> Seufert, V., N. Ramankutty & Foley, J.A, 2012. Comparing the yields of organic and conventional agriculture. *Nature*, 485: 229-234.

<sup>2</sup> EC Implementing regulation renewing the approval of the active substances copper compounds, as candidates for substitution, 2018. Available at : <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R1981&from=EN>