

CropLife Europe Position on the Revision of the Sustainable Use Directive (SUD)

Key Messages

- 1. Integrated Pest Management (IPM) must remain the cornerstone of the revised Directive. For EU farmers to fully implement IPM it is vital they have access to as many solutions as possible including agronomic, (bio)technological, biological and chemical.**
- 2. Digital and Precision Solutions must be explicitly supported in the revised SUD. The Directive needs to find the right framework to include, promote and enable the uptake of these technologies.**
- 3. Complementary Indicators should be developed. This would allow for a more accurate reflection of progress made to reduce risks associated with pesticide use in the EU as well as overall agricultural productivity and land-use efficiency.**

Context

The SUD aims to achieve the sustainable use of pesticides in the EU by reducing the risks and impacts of pesticide use on human health and the environment. The main vehicle to do this is with Integrated Pest Management (IPM). This should remain a cornerstone of the SUD. It is equally important that the Directive now looks to harness developments in digital and precision technologies and in non-chemical alternatives to pesticides. Member States are tasked to draw up National Action Plans to implement the main principles of the Directive in their Member State. It is essential that the Directive gives them, and their farmers, a toolbox they can depend on.

As part of European Green Deal, and specifically the Farm to Fork Strategy, the European Commission is revising the SUD. Many aspects in the Directive such as Harmonized Risk Indicators and reduction targets for pesticides are key to the success of the Farm to Fork and Biodiversity Strategies¹. As indicated in the Commission's latest publication on the trends in use and risk of pesticides, Harmonized Risk Indicator 1 shows a decrease of 21% since the baseline period of 2011-2013, and a 4% decline compared to 2018². CropLife Europe believes that these figures indicate that the SUD, though it could be better implemented is achieving its primary objective of reducing the risks and impacts of pesticide use in the EU. As part of preparing its legislative proposal, the European Commission is currently subjecting the SUD to a policy options evaluation as well as an impact assessment.

Integrated Pest Management: The Cornerstone of a Revised SUD

IPM must continue to be the cornerstone of a revised Directive and the EU should continue to follow the FAO definition of IPM. It considers all available pest control techniques that control the development of pest populations, including chemistry within the hierarchy of controls³. For EU

¹ https://ec.europa.eu/food/plants/pesticides/sustainable-use-pesticides_en#evaluation-and-impact-assessment

² https://ec.europa.eu/food/plants/pesticides/sustainable-use-pesticides/harmonised-risk-indicators/trends-eu_en

³ <http://www.fao.org/agriculture/crops/thematic-sitemap/theme/pests/ipm/en/>

farmers to fully implement IPM and for their businesses to succeed, they need to have access to a broad toolbox of solutions. Such a toolbox should have a combination of agronomic practices, (bio)technologies, biological and chemical control tools.

IPM is not a one size fits all solution. IPM strategies must be flexible and able to adapt to the various local agronomic conditions faced by European farmers. An IPM strategy for a farmer growing apples in central Poland will be different than for a Spanish farmer growing tomatoes in a greenhouse in Spain. For these strategies to be made readily available for farmers at the national and regional levels and promote their implementation across Europe, CropLife Europe believes that a centralized database should be made available for all existing IPM strategies.

Farming for the Future: Digital and Precision Solutions

Since the implementation of the current SUD in 2009, numerous cutting-edge technologies have been made available for farmers in order to reduce the risks, impacts and use of pesticides. In the current text of the SUD there is no reference to precision and digital agriculture nor any mention of the potential and benefits of these tools. CropLife Europe believes that the revision of the SUD is a great opportunity to find the right legislative framework to promote and enable the uptake of these innovative tools which can significantly contribute to the sustainable use of pesticides. Indeed, it is difficult to see how the ambitious Green Deal objectives can be delivered without access to such tools.

A revised SUD should enable and promote multi-stakeholder initiatives, such as the Digital Label Compliance⁴ initiative (DLC). The DLC initiative aims to provide greater Member State authority transparency and confidence in the appropriate use and reduction of risks from pesticides. Such precision and digital tools should be included within the IPM principles because they can improve record-keeping by farmers, reduce administrative burden, and help monitor and improve IPM implementation.

Another area of innovation that a revised SUD should address is that of drones. CropLife Europe supports the Commission's ambition to enable the use of drones for the application of PPPs during the revision of the SUD, as part of precision application innovative technologies. The planned revision of the SUD should also contain future-proof provisions that will allow sustainable on-farm technologies to be developed and deployed as technology advances.

Better Basis for Discussion: Adding Complementary Risk Indicators

CropLife Europe sees Harmonized Risk Indicator (HRI) 1 as a manageable tool to provide a general appreciation of the risk and use of pesticides. Nevertheless, we call on the Commission to improve existing HRIs and develop additional indicators that take into account specific agronomic situations in EU member states as well as overall agricultural productivity and competitiveness. CropLife Europe supports the European Commission plans to add complementary indicators to consider real world impacts and on-farm uptake of measures that reduce risk and/or use.

CropLife Europe believes that additional indicators should include, but not be limited to, agronomic conditions, agricultural productivity, land-use efficiency, uptake of IPM, water protection measures and quality, as well as consumer, operator, and environmental safety. CropLife Europe believes that adding complementary risk indicators would allow for a more accurate reflection of progress made to reduce risks associated with pesticide use in the EU. This in turn will lead to a more productive discussion about future solutions.

⁴ The Digital Label Compliance initiative is supported by and jointly developed by CropLife Europe, CEMA, and COPA and COGECA
CropLife Europe's Position Paper on the Revision of the Sustainable Use Directive