



EUROPEAN
COFFEE
FEDERATION



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Executive Vice-President Timmermans
Commissioner Health and Food Safety Kyriakides
Commissioner for Environment Sinkevičius

Response to the European Commission's statements on 22nd June: "Green Deal: pioneering proposals to restore Europe's nature by 2050 and halve pesticide use by 2030"

Dear Mr. Timmermans,
Dear Ms. Kyriakides,
Dear Mr. Sinkevičius,

We would like to reflect and request clarification on statements made at the press conference which took place on 22 June 2022 where you presented the "Green Deal: pioneering proposals to restore Europe's nature by 2050 and halve pesticide use by 2030".

We would however like to ask for clarification regarding a statement in the published press release¹:

"In line with its policy for sustainable pesticide use, the Commission will soon propose, for the first time ever, a measure that follows up on its commitment to take account of global environmental considerations when deciding on maximum residue levels in food. Imported food containing measurable residues of prohibited substances should, over time, not be marketed in the EU. This will contribute to a virtuous circle and encourage third countries to also limit or prohibit the use of these pesticides, already banned in the EU".

In January 2021, during a meeting with third country missions, the European Commission shared information on its preparations to implement the policy to limit imports of food containing residues of plant protection products which, according to the Commission, are contributing negatively to global environmental concerns. On the same day, it was announced that the new EU policy will limit imports of food with residues of the following groups of plant protection products: "some neonicotinoids" and "PBT substances"². Consequently, we are surprised that the scope on the current approach seems to be much broader and include all substances "already banned in the EU".³

¹ European Commission (22 June 2022); Press Release "Green Deal: pioneering proposals to restore Europe's nature by 2050 and halve pesticide use by 2030"

² In this meeting on 20 January 2021, the European Commission referred to "the decline and threat of extinction of pollinators" and "the accumulation in the environment of persistent, bioaccumulative and toxic substances"
https://ec.europa.eu/info/sites/default/files/food-farming-fisheries/events/presentations/event_pesticides_20210120_pres_env-concerns.pdf

³ European Commission (22 June 2022); subheading – Delivering globally in Press Release "Green Deal: pioneering proposals to restore Europe's nature by 2050 and halve pesticide use by 2030"

While we support the Green Deal ambition to tackle environmental challenges, we firmly believe that using multilateral fora, not non-tariff barriers, is the correct way to achieve this. We are concerned that the evolving EU policy on Maximum Residue Levels (MRLs) is likely to contradict EU law and international rules. This may create trade disruptions, legal disputes and reciprocal market access measures from other countries. If this were to happen, it could have a negative impact on both EU imports of agricultural goods and exports of higher value-added foods and drinks, agricultural development around the world and consumer choice (and prices).

Furthermore, we want to underline that MRLs for pesticides are trading standards that drive good agricultural practice and ensure a level playing field for EU and other farmers. They are not an appropriate tool to be used to tackle environmental challenges in other countries.

Finally, it must be understood that different regions have different needs due to climatic conditions or the crops being grown. Furthermore, authorities have different assessments of plant protection products. Some pesticides not registered in the EU may be necessary in non-EU countries or the evaluation concludes to safe uses. Fair market access is needed to support sustainable agriculture in countries we rely on for goods like coffee, tea, exotic fruits and cocoa, and which in turn rely on the EU market to help in sustainable development.

We would welcome your kind consideration of our view. We would be happy to discuss this further with you at your convenience and look forward to working with you.

Yours sincerely



Dr. Monika Beutgen, Secretary General of Tea & Herbal Infusions Europe



Eileen Gordon-Laity, Secretary General of European Coffee Federation



Olivier de Matos, Director General of CropLife Europe