

CropLife Europe Position on the Proposed Sustainable Use of Pesticides Regulation (SUR)

Priorities for the future framework legislation

CropLife Europe believes the promotion of innovation will be the key driver for achieving the objectives of the Sustainable Use of Pesticides Regulation and for the necessary transformation of European agriculture toward sustainability.

Pesticide reduction targets at EU and national levels need to consider the availability of alternatives and address individual country-specific agricultural environments to transition to a more sustainable European food system.

Alongside promotion of IPM and best practices for sustainability, the European agricultural sector needs a policy framework conveying a clear plan for delivering innovative technologies across the full spectrum of available solutions and increases the uptake of digital and precision tools and biopesticides.

Farming for the Future: Promoting Digital and Precision Agriculture Solutions

The European Commission recognises that precision and digital farming technologies can contribute to the reduction of the overall use and risk of pesticides in Europe. CropLife Europe agrees that the SUR is among the key legislative enablers to support uptake of these innovative tools. Today, digital technologies are available which can help farmers to predict, target and manage pest and disease pressures. Uptake of these technologies would therefore enable European farmers to reduce both the use and risk of pesticides.

The proposed SUR should enable and promote multi-stakeholder initiatives, such as the Digital Label Compliance¹ initiative (DLC). It aims to provide national regulatory and enforcement authorities with greater transparency and confidence in the appropriate use and reduction of risks from pesticides. It offers the opportunity to improve record-keeping, reduce administrative burden and help monitor and improve IPM implementation. Widespread use of innovative digital and precision farming equipment could also be used to optimise pesticide applications, substantially reducing both use and associated risks to non-target environments. Therefore, such digital and precision agriculture tools should be integrated within IPM principles and their uptake actively promoted through the SUR and the Common Agricultural Policy.

In short, the SUR also offers a unique opportunity to stimulate future-proof investments that would support the development of innovative and more sustainable technologies for farmers of all types and for all production models across Europe.

Pesticide Reduction: Reasoned and accountable targets

Pesticide reduction targets at EU and member state levels need to be proportionate and realistic to the objective of reducing the risk and use of pesticides, whilst ensuring food security and the viability of the agricultural sector in Europe. CropLife Europe welcomes the fact that the proposed targets acknowledge historical achievements of the reduction initiatives in individual member states. This

¹ The Digital Label Compliance initiative is supported by and jointly developed by CropLife Europe, CEMA, and COPA and COGECA

demonstrates that the existing Sustainable Use Directive (SUD)² is achieving its primary objective of reducing the risks and impacts of pesticide use in the EU. Nonetheless, new reduction targets also need to address additional factors including agronomic and climatic conditions, pest pressures, levels of pesticides used, food security, and food safety needs.

Furthermore, it is vital that the EU ensures availability and access for farmers to effective alternatives and cutting-edge crop protection innovations such as digital and precision tools, as well as biopesticides in their already depleted toolbox. If EU farmers are expected to be able to achieve ambitious SUR pesticide reduction targets in five years³, current authorisation timelines for approval of conventional and biopesticides need to be significantly improved. The SUR should not on the one hand restrict farmers' ability to use vital crop protection solutions, while at the same time another Regulation (1107/2009) stalls introduction of the new and improved technologies which are needed for their replacement.

Integrated Pest Management: The Cornerstone of the proposed SUR

CropLife Europe believes that Integrated Pest Management (IPM)⁴ must remain the cornerstone of the future Regulation. The Commission rightly points out that increasing implementation and uptake of IPM strategies will be key to achieving SUR objectives. Building on this approach under the existing Directive, the new framework should promote pragmatic approaches and avoid administrative burdens or unnecessarily and complicated decision-making for farmers and Member States.

CropLife Europe recommends that a centralised EU database should be made available for all existing IPM strategies to inform and guide farmers at both national and regional levels. IPM is not a one size fits all solution. IPM strategies need to be flexible and able to adapt to rapidly evolving local agronomic and climatic conditions faced by farmers across Europe.

Better Basis for Discussion: Existing Harmonised Risk Indicators (HRIs), and possible Complementary Indicators

CropLife Europe supports the European Commission's plans to consider development of complementary indicators, including real world impact and on-farm uptake of measures that reduce risk and use of pesticides. We support continued use of the existing Harmonised Risk Indicator (HRI) 1 as a manageable tool to provide a general appreciation of the risk and use of pesticides.

We believe that additional indicators should be developed which take into account specific national agronomic situations, as well as overall agricultural productivity and competitiveness. By introducing these indicators, we believe it will lead to a more practical and productive discussions about future crop protection solutions. These 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. Furthermore, complementary indicators would enable more accurate reflection of progress made to reduce risks associated with pesticide use in the EU.

² Trends in Harmonised Risk Indicators for the European Union. https://ec.europa.eu/food/plants/pesticides/sustainable-use-pesticides/harmonised-risk-indicators/trends-eu_en

³ According to EC proposal, implementation of SUR is predicted to begin in 2025 via MS National Action Plans

⁴ The SUR should continue to follow the FAO definition of IPM, which considers all available pest control techniques that control the development of pest populations, including chemistry within the hierarchy of controls
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