

Position on the Proposed Sustainable Use of Pesticides Regulation

CropLife Europe believes the promotion of innovative technologies such as biopesticides and New Genomic Techniques (NGTs) will ensure a faster transition to a more sustainable and resilient European agriculture, as well as contribute to achieving the objectives of the Proposed Sustainable Use of Pesticides Regulation (SUR).

The European agricultural sector needs an enabling and science-based policy framework conveying a clear plan to deliver these technologies before the SUR is implemented.

Pesticide reduction targets should continue to be use and risk based, taking into account individual country-specific agricultural environments, historical achievements and different national starting points, whilst ensuring food security and affordability in Europe. Furthermore, reduction targets should not be legally binding at Member State (MS) level if farmers do not have access to viable alternatives.

Incorporating digital and precision farming technologies into farmers' Integrated Pest Management (IPM) strategies will further contribute to the sustainable use of pesticides by ensuring a much more targeted application of pesticides. They can also be used to better monitor soil, water and pollinator health and improve record-keeping.

Farming for the Future: Promoting the Uptake of Innovative Solutions

The SUR is among the key legislative enablers to support the uptake of new and innovative tools, which can contribute to further improving the sustainability of agriculture. Digital and precision farming technologies can play a crucial role at all stages of pest management, helping farmers to effectively predict, target as well as manage pest and disease pressures. As recognised by the European Commission, precision and digital farming technologies can contribute to mitigating the negative effects of climate change and to reduce the overall use and risk of pesticides in Europe.

It is therefore necessary to provide a legislative framework that fully incentivises farmers to include these technologies as part of their toolbox, and to include these elements in their IPM strategies. To accomplish this, digital and precision agriculture tools should be integrated within the IPM principles and their uptake should be actively promoted through the SUR and the Common Agricultural Policy.

As part of the digital transition, our industry continues to be a part of multi-stakeholder projects, such as the Digital Label Compliance¹ initiative, to provide national regulatory and enforcement authorities with greater transparency and confidence in assessing pesticide use and risk. This concept has the potential to improve record-keeping, reduce administrative burden and help monitor as well as improve IPM implementation.

Digital technologies are not an isolated solution to add to the farmers' toolbox. NGTs also have the potential to contribute to the Green Deal objectives. These techniques reduce the complexity of plant breeding, which open up new opportunities to more efficiently develop plant varieties for sustainable as well as productive farming systems that are better adapted and resilient to the effects of climate change. This helps farmers to better protect their crops against pests and diseases, while ensuring food and nutritional security, and increasing sustainability. Providing an enabling, science-based legislative framework to allow these innovative tools to be used by European Union (EU) farmers will support the journey to a more sustainable and resilient agricultural system. We support the EU legislators' recognition that NGTs are part of the innovative toolbox and can support the objectives of the SUR by maximising productivity and optimising the overall impact of farming operations.

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

Pesticide Reduction: Reasoned and accountable targets

CropLife Europe believes that the proposed targets at both EU and MS levels should take into account historical achievements whilst ensuring food security, affordability and the viability of the agricultural sector in Europe. The methodology for the calculation of targets should continue to be use and risk based, consider levels of exposure, and include a baseline period that considers previous historic reduction initiatives. Finally, reduction targets also need to address additional factors including local agronomic and climatic conditions, pest pressures, availability of effective and affordable alternatives, levels of pesticides used, as well as food security, and food safety needs.

The latest trends published by the European Commission (EC)² demonstrate that the existing Sustainable Use Directive is contributing to achieve a reduction of the use and risks of pesticides in Europe. We support the EC's goal to gather further data on pesticide use via the Statistics on Agricultural Input and Output Regulation which can lead to the development of further complementary indicators³ to enable a more accurate reflection of progress made to reduce risks associated with pesticide use in the EU and allow future policy objectives to reduce the environmental impact of crop protection instead of focusing on input reduction.

Alternatives need to be available before reduction targets are implemented

It is vital that the EU ensures availability and access for farmers to effective alternatives as well as cutting-edge crop protection innovations such as digital and precision tools, biopesticides and NGTs in their toolbox. If EU farmers are expected to achieve ambitious SUR pesticide reduction targets in five years⁴, current authorisation timelines for approval of conventional and biopesticides need to be significantly improved. To accelerate access to the market of new solutions, it is crucial to adequately address the current lack of the required expertise resources both at MS and EU levels. Measures to further improve the data requirements, guidance and approval criteria as well as evaluation principles for biological control methods, beyond micro-organisms, are also necessary to expedite access to these solutions. Additionally, making use of Article 30 of Regulation 1107/2009 to grant provisional authorisations for biological control could be an avenue to further contribute to this objective.

IPM: The Cornerstone of the proposed SUR

CropLife Europe believes that IPM⁵ must remain the cornerstone of the future Regulation. The EC rightly points out that increasing implementation and uptake of IPM strategies will be vital to achieving SUR objectives. Digital Decision Support Systems are already providing advisors and farmers with data and science-driven agronomic advice as to when and how to treat their crops to achieve a profitable harvest, while optimising resource use, including crop protection products, in line with the principle of IPM. Building on this approach under the existing Directive, the new framework should promote pragmatic approaches and avoid administrative burden or unnecessarily and complicated decision-making for farmers.

CropLife Europe welcomes the recent publication of a centralised EU database of about 1300 existing IPM good practices including nearly 300 crop specific guidelines⁶. IPM is not a one size fits all solution. These strategies need to be flexible and able to adapt to rapidly evolving local agronomic and climatic conditions faced by farmers across Europe. We encourage the EC to continue to update the abovementioned database once new best practices are made available.

² https://food.ec.europa.eu/plants/pesticides/sustainable-use-pesticides/harmonised-risk-indicators/trends-eu_en#:~:text=On%2025%20August%202022%2C%20the,Directive%202009%2F128%2FEC.

³ These indicators could 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.

⁴ According to the EC proposal, implementation of SUR is predicted to begin in 2025 via MS National Action Plans

⁵ 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

⁶ https://agriculture.ec.europa.eu/news/using-less-chemical-pesticides-european-commission-publishes-toolbox-good-practices-2023-02-28_en