

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

**CropLife Europe believes the promotion of innovation will accelerate the transition to sustainability for European agriculture and contribute to achieving the objectives of the SUR.**

**The European agricultural sector needs a policy framework conveying a clear plan to deliver innovative technologies across the full spectrum of available solutions and increase the uptake of digital and precision tools.**

**Pesticide reduction targets methodology should continue to be use and risk based as well as addressing individual country-specific agricultural environments, historical achievements and different national starting points.**

**Incorporating digital and precision technologies into the Integrated Pest Management (IPM) strategies will optimise the use of pesticides whilst preserving the IPM principles to support farmers flexibility to find the best crop protection strategy.**

### Farming for the Future: Promoting Digital and Precision Agriculture Solutions

The SUR is among the key legislative enablers to support the uptake of new and innovative tools. The recognition that precision and digital farming technologies can contribute to mitigating the negative effects of climate change and to reducing the overall use and risk of pesticides in Europe. Digital technologies exist which can help farmers to predict, target and manage pest and disease pressures. The EC recognizes EU farmers will require significant financial investment. The SUR, as with other EC proposals stemming from the Farm to Fork strategy, should therefore be appropriately financed. European farmers and member states (MS) should not be expected to shoulder the administrative and financial burden resulting from the costs of the implementation of the proposed SUR alone.

As part of the digital transition, our sector continues to be a part of multi-stakeholder projects, such as the Digital Label Compliance<sup>1</sup> initiative, in order to provide national regulatory and enforcement authorities with greater transparency and confidence in pesticides use and risk. This concept has the potential to improve record-keeping, reduce administrative burden and help monitor as well as improve IPM implementation. Widespread use of innovative digital and precision farming tools can lead to the optimisation of pesticide and biopesticide applications. It is therefore necessary to provide for a legislative framework that fully incentivises farmers to include these technologies as part of their toolbox, and to include these elements in the IPM scheme. To accomplish this, digital and precision agriculture tools should be integrated within IPM principles and their uptake should be actively promoted through the SUR and the Common Agricultural Policy.

Digital technologies are not an isolated solution to add to the toolbox, New Genomic Techniques have the potential to contribute to the transition to a more sustainable and resilient agri-food system.<sup>2</sup>

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

<sup>2</sup> European Commission Staff Working Document on Drivers of Food Security (2023)  
[https://commission.europa.eu/system/files/2023-01/SWD\\_2023\\_4\\_1\\_EN\\_document\\_travail\\_service\\_part1\\_v2.pdf](https://commission.europa.eu/system/files/2023-01/SWD_2023_4_1_EN_document_travail_service_part1_v2.pdf)

### **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 and the viability of the agricultural sector in Europe. The methodology for the calculation of targets should continue to be use and risk based and include a baseline period that considers previous historic efforts made. Finally, 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.

The latest trends by the European Commission<sup>3</sup> demonstrates that the existing Sustainable Use Directive is achieving its primary objective of reducing the use and risks of pesticides in Europe. We support the EC's goal to gather further data on pesticide use via the SAIO which can lead to the development of further complementary indicators<sup>4</sup> to enable a more accurate reflection of progress made to reduce risks associated with pesticide use in the EU.

It is vital that the EU ensures availability and access for farmers to effective and commercially available alternative solutions as well as cutting-edge crop protection innovations such as digital and precision tools and biopesticides in their toolbox. If EU farmers are expected to achieve SUR pesticide reduction targets in five years<sup>5</sup>, 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 the 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 IPM<sup>6</sup> 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. The availability of suitable forecasting and monitoring tools for farmers to evaluate and help manage levels of diseases and harmful organisms should be further integrated into IPM. Digital Decision Support Systems can help farmers and advisors in forecasting, thereby allowing the use of plant protection products at the right time and place. 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 MS.

CropLife Europe welcomes the recent publication of a centralised EU database of about 1300 existing IPM good practices including nearly 300 crop specific guidelines<sup>7</sup>. 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.

<sup>3</sup> [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](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).

<sup>4</sup> 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.

<sup>5</sup> According to EC proposal, implementation of SUR is predicted to begin in 2025 via MS National Action Plans

<sup>6</sup> 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

<sup>7</sup> [https://agriculture.ec.europa.eu/news/using-less-chemical-pesticides-european-commission-publishes-toolbox-good-practices-2023-02-28\\_en](https://agriculture.ec.europa.eu/news/using-less-chemical-pesticides-european-commission-publishes-toolbox-good-practices-2023-02-28_en)