

Strategic Dialogue on the Future of Agriculture in the European Union Consultation - CropLife Europe Submission

CropLife Europe Recommendations

- Adopt an outcome-based EU regulatory framework that delivers an innovative toolbox of solutions (including conventional pesticides, biopesticides, digital and precision agriculture as well as plant biotechnology) and practices for EU farmers to choose their preferred production model. Such a framework must consider collaborative partnerships throughout the agri-food chain and respect the unique differences across regions and countries.
- Establish targeted, EU-wide policy initiatives to enable farmers to use digital and precision tools to optimise farming inputs without compromising outputs. These initiatives should also include training and investment support, including on infrastructures.
- Support rules that ensure fair competition between farmers in the EU and their counterparts in third countries while also recognising and enabling the tools required for different agronomic conditions around the world.

How can farmers, and the rural communities they live in, be given a better perspective, including a fair standard of living?

CropLife Europe considers that a resilient and competitive European agriculture is key to ensuring the viability of rural areas across the EU and to supporting the transition to more sustainable farming.

EU farmers are at the forefront of safeguarding and preserving our environment, rural landscapes, and biodiversity¹. A viable EU agricultural sector will help maintain a fair standard of living for EU farmers and their families, as well as promoting employment for citizens in rural areas, and will help ensure European and global food security. Furthermore, more should be done to address the infrastructural deficits currently present in rural areas which can lead to hindering the introduction of new technologies and therefore hold back critical development in rural areas, including in the agricultural sector.

In addition, for EU agriculture to maintain its competitiveness, it is vital to consider the three elements of sustainability (social, economic, and environmental) on an equal basis², while inviting and empowering all farmers, regardless of farming models with the necessary tools, training, and advice to deliver on the sustainability goals.

¹ Conservation Evidence (2023) "Provide or retain set-aside areas in farmland." Available at: <https://www.conservationevidence.com/actions/175>

² FAO (2019) "SDG Indicator 2.4.1 - Proportion Of Agricultural Area Under Productive And Sustainable Agriculture". Available at: <https://www.fao.org/3/ca5157en/ca5157en.pdf>

How can agriculture be supported within the boundaries of our planet and its ecosystem?

CropLife Europe believes that to support European agriculture within the boundaries of our planet and its ecosystem, it is important that the EU aligns its policies with global environmental goals set via the United Nations Sustainable Development Goals, the United Nations Framework Convention on Climate Change, as well as the Global Biodiversity Framework.

EU-wide initiatives should support a framework that is outcome-based and delivers an innovative toolbox of solutions and practices for EU farmers to choose their preferred production model and promote collaborative partnerships throughout the agri-food chain.

To ensure that European agriculture can contribute to the safeguarding of food security for 500 million EU consumers, EU food systems must recognise and fully embrace the diversity of European agriculture as well as the potential of different production models. By recognising the various agricultural practices as complementary rather than pursuing prescriptive or one-size-fits-all models, policies must provide EU farmers with the flexibility they require to efficiently adapt their production models to their local agronomic conditions, including the impacts arising from climate change.

CropLife Europe considers that clear, outcome-based performance indicators must be taken into account in order for EU farmers to produce safe, healthy and affordable food in a way that ensures the highest level of protection for the environment and biodiversity.

How can better use be made of the immense opportunities offered by knowledge and technological innovation?

Innovation, supported by an enabling, predictable, and science-based regulatory framework, is key to helping provide EU farmers with the necessary tools to produce safe, healthy, and affordable food sustainably. Innovation-oriented initiatives should be inclusive, ensuring farmers have access to the latest developments to optimise farming inputs without compromising outputs.

All farmers implement different tools and strategies such as Integrated Pest and Crop Management systems to deliver social, environmental, and economic benefits. As part of these integrated approaches, CropLife Europe's members are committed to delivering the necessary solutions to enhance the farmers' toolbox and provide associated support on the optimal and responsible use of these tools (i.e. conventional pesticides, biopesticides, digital and precision agriculture and plant biotechnology).

CropLife Europe believes that [conventional pesticides](#) still remain one of the most effective solutions for farmers to protect their crops from pests and disease. Our sector constantly innovates and develops more effective products with improved environmental and human health profiles. Nevertheless, farmers have seen their toolbox shrink considerably over the past years leading to significant challenges in crop protection strategies due to a lack of economically viable alternatives. To continue to have access to these solutions, it is necessary to enhance the implementation of the existing framework to accelerate the introduction of innovative products by promoting the principle of mutual recognition as well as meeting registration timelines at member state level. Furthermore, it is also important to consider realistic conditions of use and associated risk mitigation measures, as well as integrating new digital technologies in risk assessments.

Biopesticides offer farmers promising alternatives to some conventional pesticides. In that respect, our members have committed to invest **€4 billion** by 2030 to develop and bring new and more effective biopesticides to the market. **To date, our sector has invested €1.75 billion into innovation in biopesticides.** At the moment, the EU is lagging behind other key agriculture markets. The time to market for a biopesticide product in Europe can take up to 7 years on average, compared to 2-3 years in other key global markets and the return on investment in Europe is 30% below the global average for biopesticides. This leaves the EU at a competitive disadvantage.

The EU should ensure they are rapidly brought to the marketplace to unlock their full potential. Besides adopting a biopesticides definition at the EU level that includes all relevant categories, this objective can be achieved by facilitating label expansion, removing time-limited registration, and accelerating evaluation procedures by reactivating Art. 30 of EU Regulation 1107/2009. This would enable the granting of provisional authorisations and the adaptation of data requirements for all categories of biocontrol. Furthermore, the development of tailor-made and fit-for-purpose guidance documents, the provision of appropriate resources and training to Member States to ensure the timely assessment of dossiers, and the promotion of mutual recognition of biopesticide evaluations can further enhance their adoption.

The integration of **digital and precision** tools into food production systems can help optimise the use of pesticides (both conventional pesticides and biopesticides), fertilisers, and natural resources while ensuring high yields by enabling the collection and analysis of field data, thus helping farmers make more informed decisions.

For these technologies to reach their full potential, CropLife Europe believes it is important to establish targeted, EU-wide policy initiatives aimed at enabling their uptake by farmers, including support for their investment and training. Providing EU farmers with the appropriate training and advice in order to enhance digital literacy and data management skills, as well as exchanging best practices, can lead to strengthening their sustainability performance. A concrete example of this is AgriGuide³, a multistakeholder initiative with the potential to significantly transform European agriculture. Its objective is to help farmers reduce the risk and use of pesticides and biopesticides while providing advice on how and when to apply crop protection products. This will enable more environmentally friendly and efficient agricultural operations whilst helping farmers comply with increasingly complex legislation.

Our members have committed to invest **€10 billion** into digital and precision technologies by 2030. **To date, our companies have invested €2.15 billion into innovation digital and precision agriculture innovation.** In addition to private investments, national governments and EU institutions should provide the necessary funding to ensure a robust and reliable high-speed mobile data infrastructure in all EU areas. This will ensure the realisation of the full potential of these technologies and will also contribute to the viability and competitiveness of rural areas.

Lastly, CropLife Europe believes that advances in **plant biotechnology** and plant breeding, including New Genomic Techniques (NGTs), can offer a sustainable production system by making breeding programmes more efficient and accelerating the development of resilient plant varieties whilst improving crop yields. Our members are actively investing in new plant breeding techniques. Nevertheless, advances such as NGTs still face concrete regulatory barriers that limit their adoption, making approval processes costly and discouraging R&D investments in plant breeding. CropLife Europe supports the rapid adoption of a science-based regulatory framework for plants developed through NGTs. The adoption of pragmatic, predictable, and evidence-based legislation, including an effective Intellectual Property framework, can help give farmers access to these innovative tools, promote the resilience of EU agriculture and enhance its sustainability, productivity, and competitiveness.

³ AgriGuide (2024) - All you need to know. Available at: https://www.youtube.com/watch?v=805rGf48_AI

How can a bright and thriving future for Europe's food system be promoted in a competitive world?

CropLife Europe believes that it is vital for EU agriculture to remain integrated within international rules-based trade. The EU is a key cog in the global agri-food trade system. It requires globally agreed rules that ensure fair competition between farmers in the EU and their counterparts in third countries while also recognising and enabling the tools required for different agronomic conditions around the world. The most efficient allocation for resource use and cooperation on a global scale is essential to achieve global United Nations Sustainable Development (SDG) Goals.

CropLife Europe believes it is important to re-evaluate new proposed requirements for EU trade partners, and the potential trade impacts and distortions these may cause. The setting of Maximum Residue Levels with environmental goals in mind, or the export of certain substances, particularly for low-income countries, should be fully weighed against their effectiveness in achieving any desired sustainability objectives across all three sustainability pillars (environment, social, and economic).

Unilateral actions taken by the EU can lead to the adoption of different standards by different countries thereby leading to a fragmentation of global governance. Such approaches could lead to unintended consequences, including retaliatory measures taken by trading partners, thereby hampering the EU's access to key export markets while driving up costs for EU importers, producers, and consumers.

Exporting EU standards and food production systems in a one-size-fits-all approach to other parts of the world that operate in different agronomic realities is unfair and discriminatory. It is also contrary to a number of global United Nations Sustainable Development Goals⁴. Notably, the United Nations defines international trade as a vehicle for the promotion of sustainable development.⁵

About CropLife Europe

[CropLife Europe](#) is the European organisation which represents crop protection solutions. Our members are global companies, small and medium-sized enterprises (SMEs) and national associations operating in conventional pesticides, biopesticides, plant biotechnology, as well as digital and precision agriculture.

Our ambition is to help European farmers transition towards a more sustainable and resilient agriculture, providing the largest toolbox possible for them to choose their preferred production model.

4 Sustainable Development Goals - 2: No Poverty; 3: Zero Hunger; 10: Reduced Inequalities; 11: Sustainable Cities and Communities; 12: Responsible consumption and Production; and 17: Partnerships for the Goals.

5 United Nations; Sustainable Development: Trade. Available at: <https://sdgs.un.org/topics/trade>