

Wed 12/10/2016 11:49

Annexed document available via: <http://www.ecpa.eu/transparency-policy>

Dear COMAGRI MEP,

Ahead of the discussion in COMAGRI tomorrow morning on the Commission's draft proposal for Criteria for Endocrine Disruptors (ED), for Plant Protection Products (pesticides) and Biocidal Products we would like to provide you with background information on this issue, including the ECPA View on ED and infographic in attachment. The Commission published its draft proposal for ED criteria on 15 June, along with the results of its impact assessment (executive summary attached)

What is the issue?

At a difficult time for the EU agricultural sector, particularly following the Russian embargo, we find it surprising that the Commission proposal **ignores their own socio-economic impact assessment**, and proposes measures that will undoubtedly further impact the viability and competitiveness of EU agriculture. The EC has proposed an option (option 2) which they acknowledge will have **'the highest impact on sectorial competitiveness, agriculture, and trade'**, while offering *'the same high level of protection to human health'* as all other options. In other words there will be **maximum impact on agricultural competitiveness with no additional benefit for society**. Please see for reference [our letter to DG Sante](#) on 11 July highlighting these points.

What is the impact?

EU farms – big and small - are already heavily impacted by a strict hazard based regime for the authorisation of pesticides in the EU, and this proposal will only add further complications, removing more tools from the EU farmers' toolbox. This will lead to **the loss of EU agricultural jobs**. It will also result in the **development of resistance to an ever narrower range of products**. This is outlined in a recent report endorsed by Copa Cogeca and ECPA on the *'Cumulative impact of hazard based legislation on crop protection products in Europe'* which **shows losses of up to 85% of yields in some countries**. This report covers 9 EU Member States, 7 staple crops and 24 specialty crops. Please find attached a summary sheet.

What can I do?

With **46 million EU jobs at stake** across the EU Agri food sector, we feel it is important that EU Commission consider the socio-economic impact of this proposal for EU agriculture, its competitiveness and trade, bearing in mind its large contribution to overall EU GDP. **The Commission is yet to give a clear rationale for choosing such a demonstrably discriminatory and disproportionate policy option**. We hope Agriculture MEPs will take this opportunity to question the Commission on this point.

I remain at your disposal should you require any further information, and am available at any time to meet if you wish to discuss further.

Kind regards,

Graeme Taylor
Director of Public Affairs

