

Agriculture & Fisheries Council – 19th November

Current Challenges in the field of Plant Protection

- *Exchange of Views*

Addressing impacts of invasive species

Recent events have shown that we must not be complacent or underestimate the risk posed by invasive species which have potential to affect EU citizens, environment and agriculture. Examples include *Xylella fastidiosa* currently affecting olive trees and fruits, giant hogweed that can burn people and animals, and risks like mosquitos carrying zika virus or transmitting malaria.

It's really important that we maintain the means to control existing, emerging and future threats from non-native, harmful or invasive species.

This means ensuring that effective pesticides are available in Europe, taking a risk-based approach to authorisation and renewal whilst ensuring that the legislative goals of health, environmental protection and competitive agriculture are delivered.

Current approval system

The current Regulation for the placing of plant protection products on the market fully meets the objectives of protecting health and the environment. We believe that any necessary improvements in the system can be achieved by ensuring better and stronger implementation of the current system.

Better implementation of the Regulation to ensure its consistent and predictable application will help maximise the efficiency of the current system and contribute to increasing the competitiveness of EU agriculture, while continuing to protect health and the environment. With this in mind, ECPA makes the following recommendations:

- Involve Member States in the development of guidance documents
- Regular dialogue between all experts
- Ensure the European Commission remains the risk manager
- Improve efficiency of PPP renewals
- Increase the efficiency of the zonal system

Emergency Authorisations

ECPA supports the concept of emergency authorisations as provided for under Regulation 1107/2009.

We understand the view that there is an increasing reliance on emergency authorisations. However, this is a symptom of the poor implementation of certain aspects of Regulation 1107/2009, which is failing to provide sufficient crop protection solutions to EU farmers.

Ultimately growers require predictability to enable them to plan. Reliance on emergency authorisations from one season to the next unfortunately does not provide this.

Availability of conventional active substances

The number of conventional active substances is continually decreasing. This means farmers have access to fewer tools to help them protect their crops.

A recent study¹ estimated that 75 out of 400 active substances* available to farmers might be withdrawn from the market as a direct result of hazard-based assessments. The same report underlines how important it is that EU farmers have access to the tools they need not only to stay competitive, but to reduce CO2 emissions, and protect jobs (540,000 jobs rely directly on the viability of staple and specialty crops). Without pesticides staple crops² would face a decrease in yields of 10-40%. Specialty crops will be highly effected and could lose up to 85% of their yields. This situation is especially prevalent in the Mediterranean countries where Farmers' toolbox is already extremely limited. Fewer options for Farmers to protect their crops also means a greater risk of the development of resistance.

CONCLUSIONS

We would urge Ministers to respond to the specific questions presented in the note from the Presidency as follows:

- Note the risks to European Agriculture and Environment from current, emerging or future threats and call on all parties to ensure that the broadest possible range of effective control mechanisms is available to European farmers and public authorities.
- Express concern at the erosion of the risk-based approach to plant protection and erosion of science-based policy making in this sector in the European Union.
- Call on the European Commission to ensure that there is an enabling regulatory environment in the European Union to ensure effective plant disease and other pest control methods are in place now and in the future, including through better implementation of Regulation (EC) 1107/2009.
- Recall that the range of EU approved control measures for agriculture has been radically reduced in the last 15 years and action is now urgently required to ensure that risk assessment and risk management decisions are evidence based and are not unduly conservative to the extent that they are removing previously approved substances from the market at an alarming rate, whilst preventing new innovations from becoming available in Europe.'

*400 was the correct number at the time of publication

¹ Steward Redqueen. Cumulative impact of hazard-based legislation on crop protection products in Europe. Final report. 21 July 2016.
http://www.stewardredqueen.com/uploads/nieuws/cumulative_impact_of_hazard_based_legislation_on_crop_protection_products_in_europe.pdf 1

² Staple crops include: wheat, barley, maize, oilseed rape, potatoes, sugar beet and grapes. Specialty crops include: durum wheat, carrots, apples, beans, hops, onions, brassica, mushrooms, rice, tomatoes (open-air and greenhouse produces), pears, peaches/nectarines, soy, hazelnut, olives, tulip bulbs, apple trees, bell peppers, black currants, citrus fruits, cherries, sun-owers and peas for selected countries.