

A call for a coherent policy on plant protection solutions, including minor uses



- AAF 
- AREFLH 
- CELCAA 
- COCERAL 
- COPA-COGECA 
- ECPA 
- EFM 
- ESA 
- FEDIOL 
- FERM 
- FoodDrinkEurope 
- FRESHFEL 
- FRUCOM 
- IBMA 
- PROFEL 
- UNION FLEURS 

A call for a coherent policy on plant protection solutions

The **Agri-food chain Roundtable for plant protection** closely monitors the evolution of the European policy and legislation on plant protection products (PPP) and the related implications along the agri-food chain. The impact on the availability of plant protection solutions for the European farmers is of particular concern for the Roundtable. We therefore welcome the growing awareness of regulators of this important subject and specifically the recent progress with regard to the upcoming launch of a coordination secretariat for minor uses. Also the progressive implementation of Regulation 1107/2009 and its mutual recognition provisions constitute further steps in the right direction to secure sufficient protection for crops and ensure both quality and sustainability of agricultural production for growers, processors and traders.

At the same time, the Roundtable considers that these efforts are significantly undermined by several other developments which offset the progress. This is the case with the EU's on-going review of active substances which threatens to negatively affect the availability of a sufficient range of products, in particular for speciality crops and minor uses. This may lead to far-reaching implications for all agri-food-chain operators as well as final consumers.

The Roundtable would like in particular to underline the following detrimental developments that impact the availability of plant protection products:

1. The increasingly burdensome rules in regard to the approval of active substances within the framework of Regulation 1107/2009

As a result of the active substance approval process, the number and types of substances available for crop protection in the European Union are dramatically shrinking. In addition, there is a lack of EU initiatives to support low risk substances, which has resulted in a lack of these substances coming to the market as expected and needed.

This poses a specific risk for many crops as a sufficient range of crop protection solutions is important for resistance management; the risk is particularly acute for minor uses, where the availability is already very limited.

Moreover, this potentially exposes EU growers, processors and traders to unfair competition with their counterparts located outside the EU. At the same time, these operators might also be confronted with trade restrictions, should the MRL for withdrawn substances on the imported commodities be reduced to the level of detection.

2. Differences in national implementation

Within the EU, distortions of competition are further aggravated given on-going national differences on several aspects linked to usage authorisation. We would in particular highlight the different pace of mutual recognition, the extension of usage or the different approach in regard to the use of the 120 days emergency authorisation derogation set out in Article 53 of Regulation 1107/2009.

Discrepancies among the National Action Plans implementing the Sustainable Use Directive are also leading to more distortion among EU growers, processors and traders and de facto to a proliferation of complexities including on minor uses.

3. Candidates for substitution and comparative assessment

As regards the availability of active substances and the EU's objective to lessen its consequences for specialty crops and minor uses, a great distortive impact must still be expected to result from the implementation of the "candidate for substitution" policy. Indeed, in their respective evaluation processes, Member States might conduct a comparative assessment per crop on the basis of different priorities and criteria, resulting in further distortion of competition for growers in different Member States. This will have detrimental consequences along the agri-food chain for all types of active substances.

Consequently, the Roundtable would like to urge European and Member State authorities to ensure that the policies for plant protection products are implemented in a coherent manner across the EU and with third countries. This would secure that the efforts launched to solve minor use and the overall availability of active substances and plant protection products are not jeopardized by other developments.

Recommendations

The **Agri-food chain Roundtable for Plant Protection** would therefore recommend that the European Commission:

- 1) Ensures that the spirit of Regulation EC/1107/2009 is maintained through the placing on the market of sufficient (mechanical, biological and chemical) tools to protect crops, allowing European growers, processors and traders to remain competitive on international market and address the food security challenges.
- 2) Ensures with Member States that one of the main objectives of Regulation EC/1107/2009 to harmonize usage authorisation is properly implemented without excessive additional national restrictions by individual Member States.
- 3) Provides guidelines to foster harmonisation and mutual recognition by highlighting success stories in finding sustainable solutions.
- 4) Provides appropriate criteria and guidelines to enable "low-risk products" to be made available for use in a harmonised and timely way without further delay.
- 5) Provides guidelines to make sure that the "comparative assessment" of products will be done in a harmonized and practical way, without distorting competition and trade.
- 6) Urges Member States to pay particular attention to minor uses and take all the necessary steps to prevent 'orphan crops', where no suitable plant protection solutions are available.
- 7) Ensures the implementation of Regulation EC/396/2005 in a harmonised way across Member States. Processing factors are an example where EU harmonisation is needed for certain sectors.
- 8) Eliminates regulatory imbalances of pesticide legislation between EU and third countries. The MRLs for traded commodities should be set at levels that do not impair the current level of consumer health protection, while minimising the negative impact on trade.
