

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

Key Messages

- **For EU farmers to remain competitive, they need to have access to a broad toolbox of viable and effective solutions. Before including any legally binding targets concerning the use and risk of chemical pesticides, combine agronomic practices, (bio)technologies, biological, chemical, as well as digital and precision tools in Integrated Pest Management strategies.**
- **Pesticide reduction targets at EU and Member State level must be proportionate to the objective. Such targets cannot be set in a uniform and arbitrary manner without consideration of all environmental and social factors.**
- **Innovation should be the enabler of the proposed Regulation. Digital and Precision Agriculture Solutions or biopesticides must be explicitly supported to successfully work towards reaching the pesticide reduction targets.**

Integrated Pest Management: The Cornerstone of the proposed SUR

IPM must continue to be the cornerstone of the future Regulation, building on the approach under the existing Sustainable Use Directive (SUD). 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 controls¹. To ensure uptake of IPM, the new framework should promote pragmatic approaches and avoid administrative burden or unnecessarily complicated decision making at farm level.

IPM is not a one size fits all solution. These strategies must be flexible and able to adapt to the various local agronomic conditions faced by European farmers. An IPM strategy for a farmer growing apples in central Poland will be different from a Spanish farmer growing tomatoes in a greenhouse in Spain. For these strategies to be made readily available for farmers at the national and regional levels, and promote their implementation across Europe, CropLife Europe believes that a centralised EU database should be made available for all existing IPM strategies.

Pesticide Reduction: Reasoned and accountable targets

Pesticide reduction targets at EU and Member State level must be proportionate to the objective to protect human health and the environment. Such targets should not be set in an arbitrary manner without consideration of agronomic conditions, pest pressures and levels of pesticides used, food security and food safety needs and impacts on biodiversity. Growing and protecting tomatoes from pests and diseases in Spain is different to Poland. These targets should be realistic, practical, evidence based and must fully take into account relevant national initiatives. They must also consider

¹ <http://www.fao.org/agriculture/crops/thematic-sitemap/theme/pests/ipm/en/>

whether alternatives are Available, Effective, Safe and Affordable (AESA), in order to ensure the farmers' crop protection toolbox is maintained and strengthened. Furthermore, we need ensure coherence between different legislations to embrace innovation arriving to the market on time. One legislation (SUR) cannot restrict farmers access to vital crop protection solutions while the other stalls on introducing new products (1107/2009).

Pesticide Reduction: acknowledging MS historical initiatives

CropLife Europe believes that these figures indicate that the existing SUD², though it could have been better implemented, is achieving its primary objective of reducing the risks and impacts of pesticide use in the EU.

Better Basis for Discussion: Existing Harmonised Risk Indicators (HRIs), and possible Complementary Indicators

CropLife Europe sees the continued use of the existing Harmonised Risk Indicator (HRI) 1 as a manageable tool to provide a general appreciation of the risk and use of pesticides under the future SUR. Nevertheless, we call on the Commission to develop additional indicators that take into account specific agronomic situations in EU member states as well as overall agricultural productivity and competitiveness. CropLife Europe supports the European Commission's plans to consider complementary indicators including real world impacts and on-farm uptake of measures that reduce risk and/or use.

CropLife Europe believes that additional indicators should 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. Complementary indicators would allow for a more accurate reflection of progress made to reduce risks associated with pesticide use in the EU, including the contextualisation of progress made. This, in turn, will lead to a more productive discussion about future solutions.

Farming for the Future: Digital and Precision Agriculture Solutions

Since the implementation of the existing SUD in 2009, numerous cutting-edge technologies have been made available for farmers to reduce the risks, impacts and use of pesticides. CropLife Europe believes that the future SUR represents the right legislative framework to promote and enable the uptake of these innovative tools which can significantly contribute to the sustainable use of pesticides.

The proposed SUR should enable and promote multi-stakeholder initiatives, such as the Digital Label Compliance³ initiative (DLC). The DLC initiative aims to provide Member State regulatory and enforcement authorities with greater transparency and confidence in the appropriate use and reduction of risks from pesticides. Such digital and precision agriculture tools need to be included within the IPM principles, as they can improve record-keeping by farmers, reduce administrative burden, and help monitor and improve IPM implementation.

Finally, the SUR must contain future-proof provisions that will allow sustainable on-farm technologies to be developed and deployed as technology advances.

² https://ec.europa.eu/food/plants/pesticides/sustainable-use-pesticides/harmonised-risk-indicators/trends-eu_en

³ The Digital Label Compliance initiative is supported by and jointly developed by CropLife Europe, CEMA, and COPA and COGECA

