Re: Copa and Cogeca's position on the proposal for a Regulation on the Sustainable Use of Plant Protection Products (SUR)

Dear Ms Fink-Hooijer,

I am writing to you to communicate Copa and Cogeca’s position on the proposal for a Regulation on the Sustainable Use of Plant Protection Products (SUR) published last 22 June 2022.

First of all, I would like to point out that the EU Green Deal’s objectives were set in the pre-pandemic era and, thus, did not factor in or provide for the cumulative crises that have since hit us, namely Covid-19, the war in Ukraine and the continuous advance of climate change. Today, EU agriculture is faced with all three, albeit to different degrees.

The Farm to Fork Strategy (F2F) will undoubtedly affect EU production. Yet, given the current circumstances, it is essential that we keep our yields stable and produce sufficient quantities to guarantee food security for EU citizens. It is for this reason, 2 years after the F2F publication, that we continue to insist that all three pillars of sustainability (economic, social and environmental) must be taken into account before any legislative step forward is made.

It is fundamental that policy formulation and implementation support farmers and their cooperatives’ economic sustainability and improve the functioning of the markets while contributing to a more environmentally and socially sustainable agri-food sector. This is the only way to take into account the long-term contribution of agriculture and rural areas when it comes to production of food, feed, bio-based products and bio-fuels.

To accomplish this as well as ensure sustainable production and the economic viability of their businesses, European farmers and agri-cooperatives need to be equipped with the right toolbox. More precisely, they need to be provided with available, safe, effective and affordable tools to be developed according to cutting-edge science.

Please find below some of our main concerns regarding this proposal:

1. Availability of alternatives to chemical plant protection products (PPPs)
   We accept the transition proposed in this proposal, but we also strongly believe in the principle that there should be no ban without viable alternatives at hand. Moreover, it is crucial to accelerate the approval processes for new active substances, be they chemical-synthetic or of biological origin.

2. Insufficient impact assessment
   The Impact Assessment Report accompanying the SUR does not sufficiently explore the impacts of the Commission’s proposals on agricultural production. These impacts should, of course, be taken seriously and verified through appropriate research and field trials. It is irresponsible to compromise the sources of nutrition of more than 450 million people on the basis of an insufficient impact assessment. We insist on the need for a
full impact assessment with a view to securing nutrient supply and avoidance of leakage effects.

3. Adequate and well-founded definition of sensitive areas
For sensitive areas, we feel that excluding the use of any PPP, especially if that includes non-chemical measures (e.g. biocontrol) is too extreme and will be very detrimental for many regions that depend on agricultural production. Besides, without a precise indication of which areas specifically are concerned and how these provisions should be interpreted, this may lead to over interpretation and banning of all uses of plant protection products on areas of land used for agricultural purposes. This will have a huge negative impact on agricultural production across the EU.

4. Unrealistic reduction targets in the current socio-economic circumstances
The reduction targets for the use and risk of chemical pesticides by 2030 are clearly overambitious considering the current socio-economic and political challenges. We call for a fundamental readjustment of the EU Commission’s proposals in this regard. The reviewing and setting of new future targets must be based exclusively on sound scientific knowledge. Setting a minimum reduction target as proposed by the Commission without a sufficient agronomic or scientific basis is particularly detrimental to countries that have already significantly reduced the use of chemical and hazardous plant protection products.

5. A mandatory electronic register is unfeasible and may compromise confidentiality of data
Copa and Cogeca also categorically reject the demand for an electronic register for (almost) all equipment for the application of plant protection products, as the possible expense far exceeds the expected benefit of this measure and will only increase the workload and the economic and administrative burden on farmers. If data collection pertaining to the application of plant protection methods is required, any additional bureaucratic and administrative burden for farmers should be avoided. Furthermore, should we be required to share all data, we would also require clarification on the further use of the required data to avoid compromising the safety of farmers’ private and confidential information.

6. Making CAP voluntary funds mandatory for the transition is not the way forward
We welcome the inclusion of support measures for farmers during the first five years after entry into force of the Regulation to facilitate the application and implementation of certain provisions at farm level, however we cannot welcome the option for support through the CAP. We would once again be using CAP funds to support actions/measure that go beyond legislative requirements and which are not part of existing EU legislation. Going beyond legislative requirements means going beyond enhanced conditionality and this would mean that we would be looking at these measures becoming de facto mandatory for farmers. This is unacceptable for us.

Following these arguments, you may find our detailed position paper in all Copa and Cogeca languages in the annex of this letter. Finally, we hope you are able to take our concerns into consideration and should you have any further questions or remarks, please do not hesitate to contact us.

Yours sincerely,

Pekka Pesonen
Secretary General