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CEFS POSITION

CEFS VIEWS ON THE PROPOSED SUSTAINABLE USE OF PESTICIDES REGULATION

CEFS, the European Sugar Manufacturers Association, closely follows developments on the proposed Sustainable Use of Pesticides Regulation (SUR). Below are our specific views on some key elements of the proposal:

1) Evaluate the real impact

The proposed 50% reduction target in Plant Protection Products (PPPs) by 2030 should carefully be assessed. The baseline for the reduction target (as proposed: 2015-2017) should be more flexible and allow member States to take into account an earlier baseline if they have set up pesticides reduction programs prior to these years. In addition, the proposed percentage reduction does not at all take into account the basic levels of pesticide consumption in individual member States. States with current lower levels of pesticide consumption may reach dysfunctional and unsustainable levels in terms of agricultural crop production and competitiveness. The impact assessment of the current Directive only provides an overview of different policy options, and do not evaluate the proposed Regulation. The study insufficiently assesses the impact of these targets. In addition, the proposal should make a distinction between the different crops so as to properly consider the agricultural reality. Besides, the impact of a ban on all PPPs in "sensitive areas" and of operating a 3-meter buffer zone cannot be evaluated as there is no EU definition of "sensitive areas". Clarity on the total areas affected is needed. CEFS calls on the Commission to perform comprehensive impact assessments on production, costs, reduction of GHG, prices, trade and necessary investments, so as to adopt operational rules that do not lead to technical stalemates in crop protection.

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2) Integrated Pest Management (IPM) already works and should be further developed

The proposed crop-specific rules should be less rigid. The anticipated double conditionality mechanism would not work in practice and should be removed. Indeed, by the time the double conditionality is fulfilled, the use of chemical PPPs may be too late to ensure satisfactory crop protection. To avoid this, the Commission should apply the current definition of IPM (Art. 6.3 SUD). In addition, IPM should be recognised as a key management tool, further improved and encouraged. There is a huge data gap at EU/National/Regional levels on the application of IPM measures. IPM rules must be based on a realistic assessment across the EU, that takes into account the diversity of agriculture. As this is impossible today due to a data gap, this part of the proposal does not fulfil the Commission's standard of evidence-based decision-making. IPM rules should also ensure sufficient support for New Genomic Techniques (NGTs) as they have the potential to contribute to PPPs reduction targets.

3) Alternatives should be affordable and equally effective

In the EU, Plant Protection Products are being removed at a grater pace than new solutions are being put in place. To avoid technical deadlocks in crop protection, the SUR proposal and its targets should be examined only once sustainable alternatives and innovative tools (e.g. NBTs) are made available. Any proposed alternatives to chemical PPPs should be affordable, effective, safe and sustainable. Facilitating the approval of PPPs containing biological active substances is not enough: so far and for many crops, such products have not proved to be effective and will not be available to farmers in the short and medium term to provide satisfactory control of harmful organisms.

4) Reciprocity with imported products

The effects of the proposal on trade and consistency with trade policies should be assessed with proper Impact Assessments. The decreasing availability of PPPs will lead to an increase in imports and weakening of EU competitiveness. It could impact health and environment in 3rd countries. To avoid this, the EU must ensure reciprocity of production standards (e.g. via Maximum Residues Limits [MRLs] and mirror clauses). The EU should not authorise importing products grown with active substances that are banned in the EU. CEFS calls on the Commission to systematically integrate mirror clauses in policy initiatives and international agreements.