

ECPA view on Individual private retailer standards banning or restricting the use of pesticides

ECPA believes that setting individual private retailer standards which are not supporting sustainable agricultural principles by banning or restricting the use of pesticides to specific products or restricting the number of active ingredients residues is not an appropriate means of ensuring sustainable production methods and high quality produce.

The key to ensuring this is the responsible use of all available tools to protect plants from pests and diseases, including the responsible use of pesticides in line with good practices and IPM principles.

Why the setting of such individual private retailer standards has no meaning?

To be authorised for EU use to protect our food against pest and diseases, pesticides have to pass a range of stringent tests and assessments to comply with the high safety standards under EU legislation. This regulatory process is obligatory and binding. Based on science and relevant developments, these tests and assessments include among others the effects on human health (incl. all types of consumers) and environment (incl. plants, birds and mammals) on both short and long term and residues in food. Firstly assessed by a Member State, then by the European Food Safety Authority (EFSA) and finally agreed by all Member States, the EU legally binding framework ensures the highest protection of human health and the environment. Once the process is successfully completed, the pesticide that is authorised is considered as safe for use and available to be used.

Establishing individual private retailer standards for pesticide which are not supporting sustainable agricultural principles is undermining the confidence in the existing science-based European approval process. This is not the way forward for Europe.

The setting of such individual private retailer standards will:

- Endanger the European-wide production of a large variety of fruits and vegetables, each specific crop requiring specific pesticides which is also dependant upon pest pressure of the crop growth environment (dictated by soil type and climate). A system establishing an *a priori* list of pesticides to be banned or restricted is therefore inappropriate as fails to consider variable growing conditions.
- Confuse consumers and create unjustified fears concerning the quality and safety of EU foods, potentially affecting the consumption of certain foods critical for a diversified and well-balanced diet, rich in fruit and vegetables necessary for healthy lifestyle. This opposes the current tendency to increase the supply of healthy and affordable food for all to tackle issues such as obesity, diabetes, and heart diseases.
- Fail to ensure food quality systems based on objective and scientific criteria, as arbitrary decisions are often taken on the appropriate protection tools.
- Increase the chance that certain pests become resistant to pesticides as growers are left with fewer products with which to combat target pests or diseases. Fewer available pesticides hamper resistance management strategies in the field, so it is therefore key to have a sufficient toolbox of pesticides available to avoid resistance development.

- Create uncertainty as to which pesticides can be used by producers and consequently endanger the good functioning of the EU internal market.
- As the farmer will have less or even no pesticides available to protect the crops, harvest losses and potential higher production costs can be expected with the possible consequence of higher fruit and vegetables prices.
- Undermine existing food chain guidelines and standards, (including Integrated Pest Management (IPM)), which aim to optimise processes throughout the whole food chain, from production to distribution.
- Conflict with the overall principles of IPM where all methods that help prevent or manage pests, whether through general crop management practices such as rotation, or of cultural, physical, biological or chemical nature are included. Pesticides play an important role in IPM schemes and additional constraint by individual retailer schemes can negatively affect the fine balance of such schemes.

The way forward

The key towards ensuring sustainable production and the supply of high quality produce for consumers lies in building on the existing regulatory processes and existing standards on good practices, including IPM. All actions directed towards this aim should be economically and ecologically viable to reach a fully secured sustainable food production.

The first layer to ensuring this should remain the European regulatory legally-established framework. Once the producer is complying with those legal requirements, it means that the food produced is of high quality and safe for consumers. Therefore and in light of all the effects described above, establishing individual private retailer standards which are not supporting sustainable agricultural principles is inappropriate.

Instead, global schemes (e.g; GlobalGAP, QS, etc) which are based on EU legally binding rules, commonly-agreed science-based criteria, discussed and agreed in an open way through consultation with all relevant stakeholders are more appropriate. These are also assessed and controlled via experts and support the concrete implementation of the European regulatory legal framework in the field and contribute towards a more sustainable agricultural production. This helps achieving a transparent effective framework which is cost effective and easier for growers to comply with and enforce.

This type of global scheme, which is based on IPM and its key components (i.e. prevention, observation, informed decision making and intervention) helps enhancing agricultural practices, which are the fundamental goal to fulfill.

In this view, any specific pesticide listing is meaningless, as all appropriate agricultural practices (i.e. preventive measures, cultural, mechanical, biological and chemical practices) have a key role to play within such kind of schemes and take account of local growing conditions, the type of crops and the different issues encountered. In this respect, pesticides are recognised as one integrated part of the solution.