

A Call for a Coherent Policy on Plant Protection Solutions, including Minor Uses

*Hosted by: Mrs Anthea McIntyre
and the Agri-Food Chain Partners*

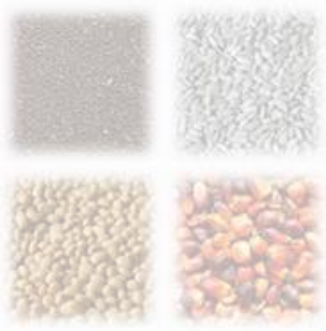
Agri-Food Chain Roundtable for Plant Protection




Luc Peeters *COPA-COGECA*

Agriculture production perspective






Agri-Food Chain Roundtable for Plant Protection Producers' perspective




WHAT FARMERS DO:

- Grow healthy crops, provide safe food, safeguard the environment and take into account consumers' needs
- Train and receive continuous information
- Apply Integrated Pest Management at farm level
 - Agricultural practices: preventive measures, cultural, mechanical, biological and chemical practices
 - Use treated seeds to reduce post-emergence treatments
- Store, handle and spray Plant Protection Products in a safe and responsible manner
- Treat remnants and their packaging according to high environmental standards
- Keep records of any use of Plant Protection Products



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WHAT FARMERS FACE:

- Regulatory uncertainty:
 - Multiple pieces of legislation (Reg. 1107/2009, Water Framework Directive, Guidance documents, national)
 - Endocrine Disruptors
 - Candidates for substitution (since December 2013)
 - Comparative assessment (not a clear and common process for Member States)
 - Differences in national implementation of the legislation in force
- Higher risk of selection for resistance due to fewer products available
- Specific needs for Minor Uses and Specialty Crops (MUSC)
- Lack of alternative solutions
 - Low-risk active substances (only 3 approved)

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Specialty Crops & Minor Uses

Risks:

- Weed control
- Pests
- Toxic plants

Losses for crops

EC Actions:

2/2014: EC report on the establishment of a EU fund for minor uses:

- Creation of an independent coordination facility
- FP7 - Integrated Pest Management ERANET project

Next steps: strengthen the role of the agri-food chain in the context of these opportunities

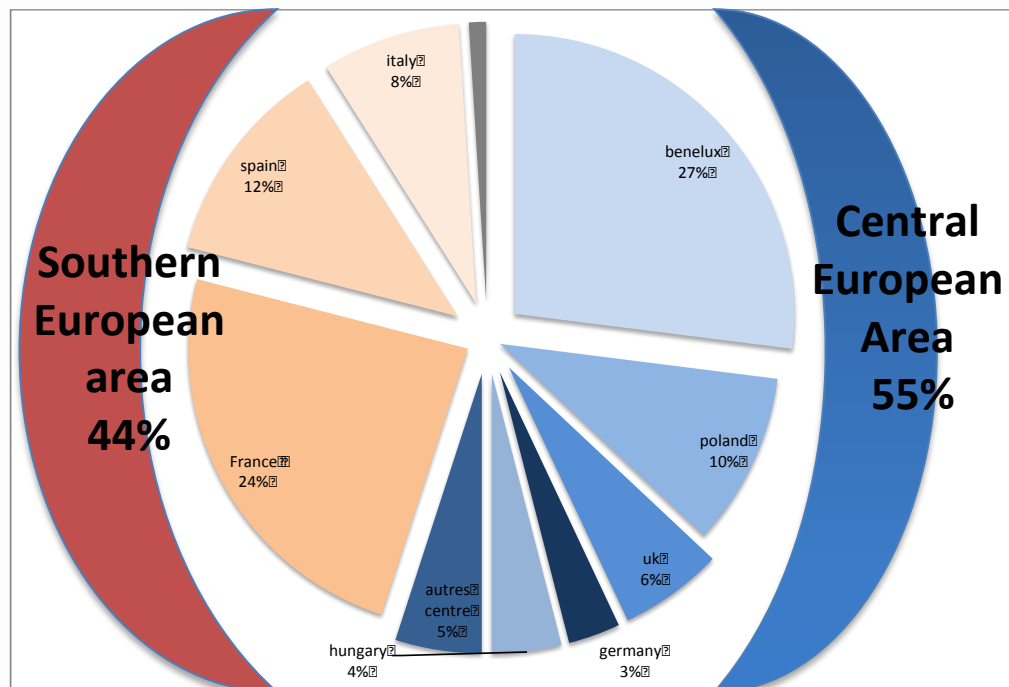
- Decide on priorities
- Establish a database
- Direct the research

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Specialty Crops -The issue

Minor uses – mainly affected countries:

**Northern
European
Area
1%**



Data refer to the volumes of production of vegetables

Divided into:

Northern European Area: 1%

Central European Area: 55%

Southern European Area: 44%

- The current system is effective but fragile- based on voluntary actions & inadequate to address future challenges
- Need for a **single European zone** (one single market) instead of 3 separate zones – Need to extend mutual recognition for all minor uses in all areas
- Need for a more ambitious solutions (more human resources & financial means)

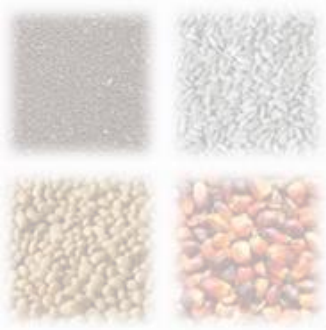


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WHAT FARMERS NEED:

- Farmers need an economic outcome of their work to make a living
- Present information to the general public objectively and not misleading
- Full socio-economic impact assessments for active substances
- Risk-based systems for approval of new active substances and renewal of existing ones
- Better functioning of the internal market
- Improve mutual recognition
- Extension of authorisation and more research for Minor Uses and Specialty Crops (MUSC)
- Provision that allows seeds companies to treat seeds in all Member States to improve availability of treated seed for farmers throughout the EU



Nathalie Lecocq
Fediol

The need for processing factors





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The need to provide processing factors (PF)



Legislation concerned

- Regulation 396/2005 = MRLs in food/feed
- Maximum Residue Levels (MRLs) for pest. = trade standards **not safety limits**

Issue

- MRLs are set for raw (unprocessed) products
- MRLs also apply to **processed commodities**
- **Processing factors** (PFs) to indicate whether MRLs increase/decrease during processing

MRL processed commodity = MRL of corresponding raw commodity x PF

- **But** Annex VI, which is scheduled to set PFs, **not yet implemented....after 10 years**

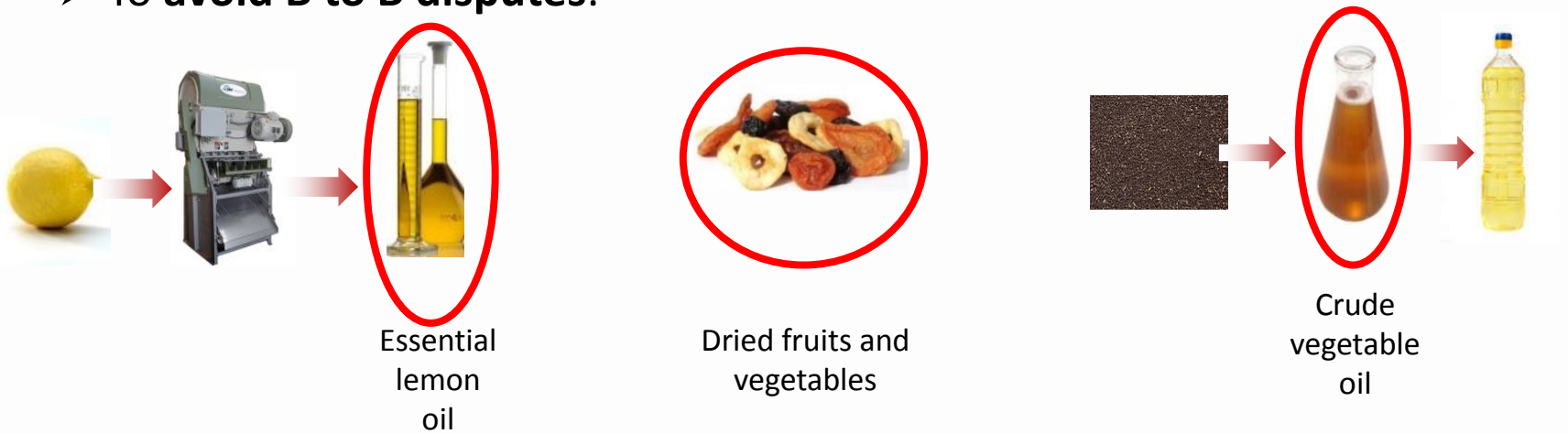
Absence of harmonized PFs creates challenges for EU industry

- **MS may adopt different approaches** when interpreting testing results on pesticides in processed commodities: **no legal certainty** for operators!
- Grey area around pesticide residues in **B-to-B contract specifications** on processed products: risk of disputes.

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The need to provide processing factors (PF)

Importance of harmonized PFs for vegetable oil industry, traders in dried fruit and vegetables and lemon industry

- To ensure **harmonized interpretation** of testing results for pesticide residues in processed products across MS.
- To support the **international trade** of crude vegetable oils, essential lemon oil, dried fruits and vegetables into and within the EU.
- To **avoid B to B disputes**.



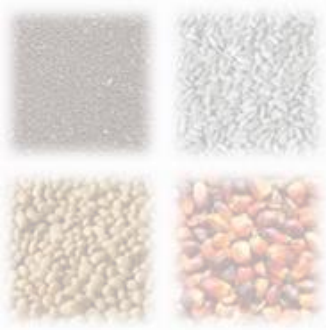
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The need to provide processing factors (PF)

What is needed?

- A **pragmatic and harmonized approach** within EU for developing MRLs on processed commodities



- PFs especially needed for **crude vegetable oils, processed/dried fruits and essential lemon oil**



A trade perspective

Katharina Keimelmayr
Coceral

*

Egle Eimontaite
Freshfel Europe



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A trade perspective

Perspective and concerns of trade

Supply and quality of agricultural products



- Spirit of Reg. 1107/2009: availability of tools for quality and sustainable production => ensure availability to avoid shortage of supply
- Minor use
- Importance of storage protection products

Trade barriers with Third Countries

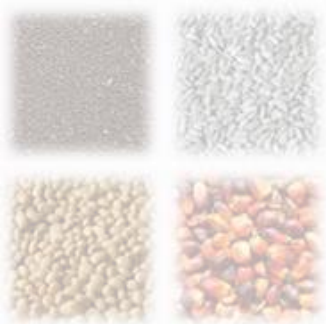


- Differences of MRLs between countries with impact both for import and export
- Technical trade barriers increase costs while there may not be a food safety issue

Different standards and lack of consumer confidence



- MRL = trading limit not safety limit
- Interaction MRL and ARfD
- Multi-residues
- Transparency and communication on residues => confidence in legislation to prevent private standards



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From an international trade perspective

Issue: differences in MRLs between countries

- Can adversely affect the trans-boundary movement of agricultural products.

Background: different legislative approaches and or different economic importance of crops

- Different approaches used to assess consumer risk exposure.
- Different relative economic importance of one crop over another in different countries that drive different PPP authorisations.

Trade issue: blocking of goods where there may not be a food safety issue

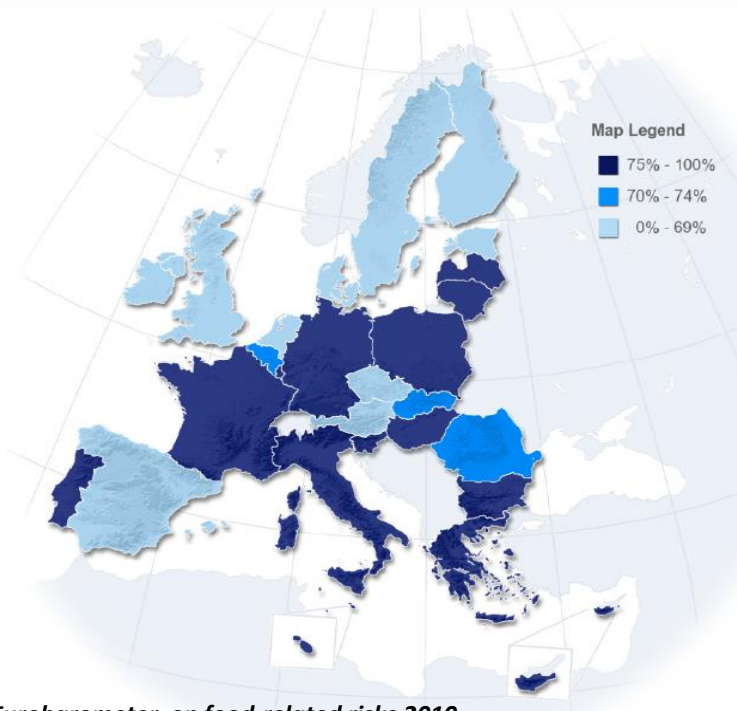
- Reduces efficiency of markets and increases costs while reducing global capacity to provide for food security.

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A trade perspective

Low confidence vs. high compliance

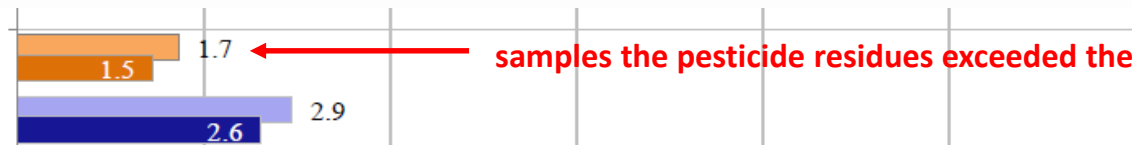
“Pesticide residues in fruit, vegetables or cereals”;
Geographical distribution of “Total worried”



- => **public & private responsibilities:**
 - ✓ public authorities to build consumer confidence in the regulatory framework
 - ✓ private sector to comply with the legislation
- => **High level of compliance with MRLs in the EU:**

98.5% of food in compliance!

Overall result (surveillance and enforcement; EU/EEA/TC origin) (80967)



samples the pesticide residues exceeded the legal limit

Source: The 2013 European Union report on pesticide residues in food

■ 2012 non-compliance rate * ■ 2013 non-compliance rate *
■ 2012 MRL exceedance rate ■ 2013 MRL exceedance rate

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A trade perspective

Key area to be addressed

- Holistic approach and policy coherence:
 - *food safety, environmental and plant health expectations*
 - *PPP, biocides, fertilizers, food additives, processing aids...*
 - MRL confidence:
 - *MRL/ARfD*
 - *Multi-residues*
 - *Lab testings uncertainties*
- } Impact of private standards





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What is needed:

- Sufficient PPP tools available on the market to:
 - *adequately protect the crop against plant health diseases*
 - *secure constant quality and availability of crops*
 - *maintain competitiveness of the European agri-food sector*
 - *avoid distortion of competition among growers and in the supply chain*
- Coherent application of MRL regulatory framework within EU:
 - *address gaps (ARfD/MRL inconsistencies, multi-residues, lab testing)*
- Avoidance of technical trade barriers with third countries:
 - *strive for harmonized MRLs where possible*
 - *allow for import tolerances, as appropriate, if no food safety concerns & no need of authorisations in the EU*
- No compromise on food safety
 - *collective responsibility (public & private)*
 - *to be supported by science*

=> stricter rules than the regulatory limits add cost for the sector but do not lead to safer food!

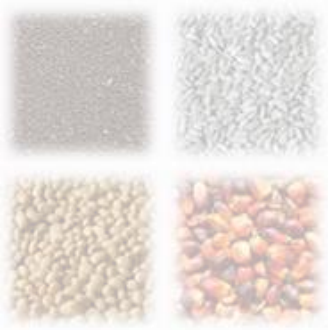


Jean-Charles Bocquet

ECPA

A PPP producer's perspective





Agri-Food Chain Roundtable for Plant Protection A crop protection industry perspective



- Facing regulatory burdens
- Committed to safe use of PPPs (IPM, trainings, fight illegal pesticides, etc.)
- Looking for solutions
- A responsible sector – come and visit us, we are open!
www.hungry4change.eu



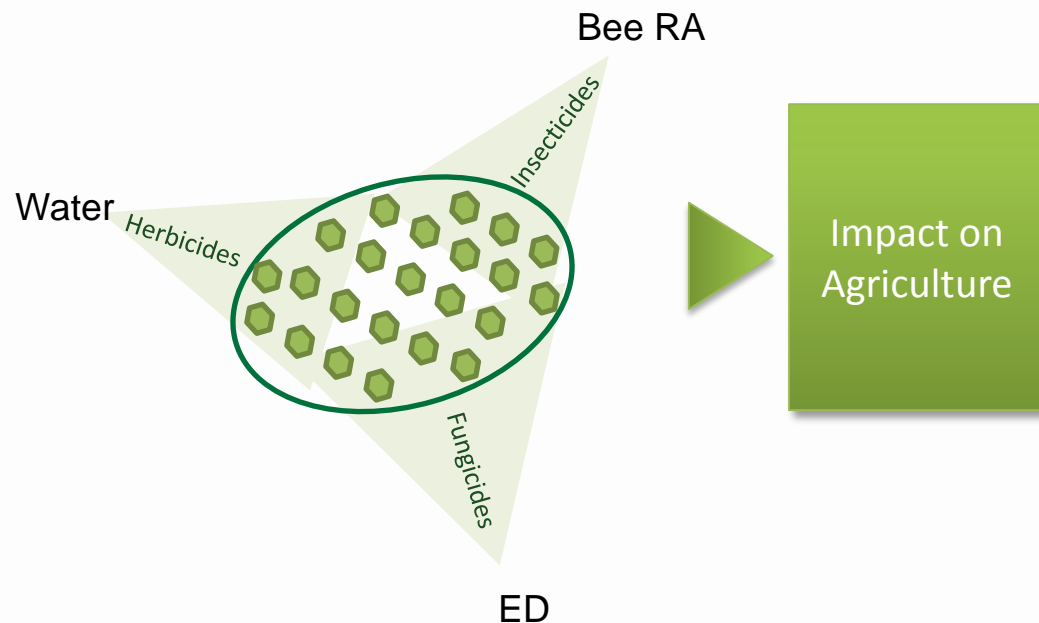
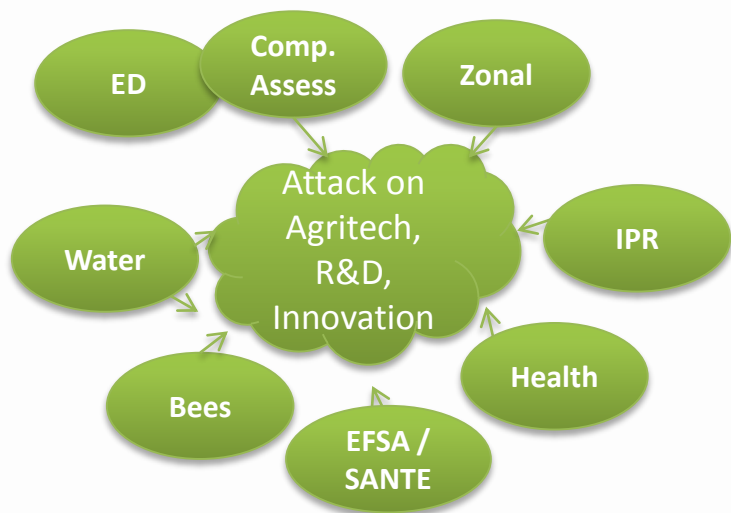
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A crop protection industry perspective



Concern!!

Impact of hazard-based legislation



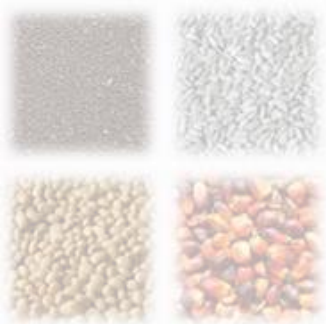


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A crop protection industry perspective



Why these concerns?

- 10 years+ and > €250 million for a new solution
- EU is losing attractiveness (*33% of global CPP R&D focus in early 80's; only 7.7% today!*)
- Current regulation not effective
- Delays in setting the rules (ED...)
- “Precautionary” approach (NNI’s...)
- Fewer CP solutions does not mean reduction of use
- Progress in stewardship and safe solutions not fully recognized and not taken into account (IPM)



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How to address these concerns?

- Decisions based on risk assessment and an understanding of the impact
- Check the workability of any regulation before proposing new ones!
- Urgent need to review both regulations 1107/2009 and 396/2005
- **Let`s work together to help producers grow safe and healthy crops!**

Thank you !!

minor use major value

If the EU** fails to provide plant protection solutions for minor use and speciality crops*** Is Europe ready to lose a market worth €70 billion/year, representing 22% of the total value of annual EU agricultural output?

* An awareness raising campaign promoted by the EU Agri-Food Chain Partners (AREFH, CELCA, COCERAL, Copa-Cogeca, ECPA, ESA, Freshfel, BMA, PROPEL and Union Fleurs)

** The European Commission, The Council of The European Union, The European Parliament, and Member States

*** Minor uses concern crops grown on relatively small acreage like fruits, herbs, vegetables, cereals including rice, seed crops and small crop seed treatments, hops, flowers and all those plants that need a tailor made plant protection products, whether it is for growing them, storage or transportation

Crop Spring onion (Scallion, salad onion) (genus *Allium*)

Pest threat Downy mildew

Region at risk United Kingdom

Crop area at risk 1,700 ha

Potential pest impact Downy mildew can render useless up to 50% of a spring onion harvest. In the UK the spring onion market is worth €30 million and provides jobs for around 1,500 people.

What's the problem? The spring onion is just one of many fruits and vegetables that rely on minor use and speciality crop protection solutions. If the EU fails to support the technologies required to produce speciality crops, the spring onion and other popular fruits and vegetables may no longer be grown in Europe.

- Field of treated spring onions
- Field of untreated and downy mildew infected spring onions
- Moulds pose a serious threat to certain crops
- Healthy harvested spring onions

Integrated pest management (IPM)

IPM is a holistic approach to sustainable agriculture that focuses on managing insects, weeds and diseases through a combination of cultural, biological and chemical measures that are cost-effective, environmentally sound and socially acceptable. This includes the responsible use of crop protection and plant biotech products.

WHY IS IPM IMPORTANT?

GLOBAL POPULATION is on the rise and therefore so is **FOOD DEMAND**. This means farmers must **INCREASE YIELDS ON EXISTING LANDS**.

IPM provides farmers with tools and strategies to **SUSTAINABLY MAXIMISE PRODUCTION** AND **MINIMISE LOSSES** due to insects, weeds and diseases.

while **PROTECTING BIODIVERSITY** AND **LOOKING AFTER THE ENVIRONMENT**.

KEY COMPONENTS OF AN IPM STRATEGY

FARMERS are the primary decision makers in implementing IPM strategies.

- PREVENT** the buildup of pests: undertake surveillance, select varieties, manage crop.
- MONITOR** crops for both pests and natural control mechanisms: identify threats, determine action.
- INTERVENE** when control measures are needed: choose method, plan approach, measure responsibility.

Integrated pest management Role of the crop protection industry

RESEARCH & DEVELOPMENT

- Developing innovative chemistry and other control agents to manage insects, weeds and diseases.
- Improving crop varieties with pest and disease resistant traits.

TRAINING

As part of an on-going commitment to stewardship, the crop protection industry has several initiatives in place providing for training on best management practices, including IPM strategies.

RESISTANCE MANAGEMENT

Over time, pests can develop resistance to different control methods. The plant science industry works to provide strategies and information that can help farmers manage insect, weed and disease resistance.

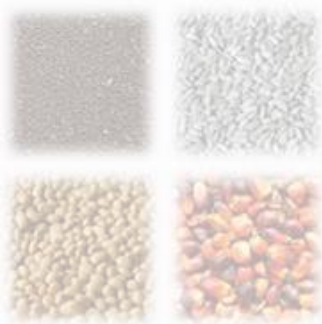
IPM TRAINING INCLUDES:

- IDENTIFYING** beneficial insects
- WHEN AND HOW** to manage pests
- RESPONSIBLE USE** of crop protection products
- PROPER DISPOSAL** of empty containers or unused products



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Exchange of view with
Wolfgang Reinert
DG SANTE
European Commission




A Call for a Coherent Policy on Plant Protection Solutions, including Minor Uses

Discussion



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Key messages

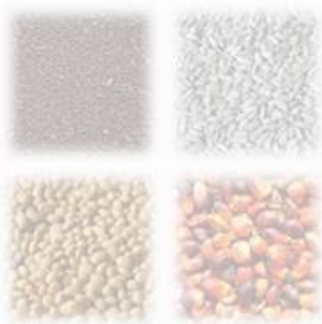
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- Increase of burdensome rules for EU approval of active substances
 - Differences in national implementation leading to distortions
 - Further concerns with regard to availability with upcoming debates on candidate list for substitution



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- Ensure 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.
- Ensure with Member States that one of the main objectives of Regulation EC/1107/2009 to harmonize usage authorisation is properly implemented.
- Provide guidelines to foster harmonisation and mutual recognition by highlighting success stories in finding sustainable solutions.
- Provide appropriate criteria and guidelines to enable "low-risk products" to be made available for use in a harmonised and timely way, without further delay.
- Provide guidelines to make sure that the “comparative assessment” of products will be done in a harmonized and practical way, without distorting competition and trade.
- Urge Member States to pay particular attention to “minor uses”.
- Ensure 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.
- Eliminate regulatory imbalances of pesticide legislation between EU and third countries.



Thank you for your participation

Enjoy the cocktail