



# PLANT HEALTH IN THE EU

## WORKSHOP CONCLUSIONS ON THE IMPACT OF THE CURRENT PROPOSALS ON CROP PROTECTION SOLUTIONS IN EUROPE

Below are the key points of agreement at the workshop held on 23<sup>rd</sup> April 2008 to discuss the proposal for a Regulation on the placing on the market of PPPs, replacing Directive 91/414/EEC.

### **General**

One of the key aims of the legislation was to ensure safety of plant protection products in the production of safe and high quality food in the European Union. Plant protection products play an important role in food production and their use by farmers follows the principle of *“as little as possible but as much as necessary”*.

The development of the new Regulation needs to make further progress in harmonisation, and must also ensure that a wide range of safe plant protection products remain on the EU market. All stakeholders have a responsibility to ensure a more common approach that is complimentary to the Common Agricultural Policy, and ensures that European farmers can produce high quality products, in a sustainable manner.

### **Zonal authorisation**

A key aim of the Commission proposal was to improve harmonisation in product authorisation. The Regulation will have no purpose if further harmonisation is not achieved. The zonal concept provides clear opportunities, and must be implemented, ensuring that the same products are authorised throughout the respective zone while taking agronomic and environmental conditions into consideration. While Member States will take final decisions, the flexibility in


decision making should be minimised to ensure that harmonisation can this time be achieved.

In order to fully resolve current intra-community barriers to trade and use of treated seeds, an EU-wide authorisation for seed treatment is needed. Such a concept would also help to encourage the filing of these specific small-scale applications. Close cooperation between the Member States will be vital to ensure a more harmonised approach, and affected stakeholders will continue to support the development of the most efficient worksharing system.

### **Cut-off criteria**

The proposed cut-off criteria will have a negative impact on the availability of crop protection products. The Parliament proposal in particular will lead to the loss of over 80% of products, while the Commission proposal will greatly reduce the availability of fungicides. The impact on EU production and a consequent dependence on third country imports does not comply with the principle of sustainability which is important to us all. The loss of so many products will negatively impact on resistance management and Integrated Pest Management (IPM) programmes, and will make it difficult to efficiently protect against pests and diseases within the MRL limits set.

The proposed cut-off criteria are based on the hazard classification of the active substance without taking into consideration any potential risk of the final product. Such politically driven cut-off criteria are unacceptable and the



regulatory system should ensure a full risk evaluation, considering all elements that may influence the safety of the products used. In particular in line with our WTO obligations under the SPS agreement, it will be difficult to impose on third countries domestic policies not directly related to food safety.

### **Minor uses**

Farmers and growers as well as seed producers and plant breeders are facing increasing problems with less products being authorised and for only a limited number of applications. However, the current EU legislative framework does not take into consideration the reality of an ever more diversified European agriculture based on many speciality crops and niche markets.

Maintaining a wide range of products and a facilitated extension and mutual recognition procedure of existing authorisations to such Minor Uses is therefore absolutely crucial for the agricultural sector in European Community.

A list of authorised products for minor uses in one country should be made available to all and published at least once a year. A system of networking and information sharing could be developed at EU level, via a data base.

A particular attention should be given to crops not intended for food or feed production (i.e. vegetable seeds intended for multiplication). Such crops should not be submitted to the same constraints as crops intended for consumption. MRL setting for

example are superfluous and costly.

### **IPM (Integrated Pest Management)**

A wide range of safe products are needed to ensure sustainable agricultural production and have shown to be vital for Integrated Pest Management (IPM) in general, and in particular for an effective resistance management. We urge policy makers to adopt a risk based approach and to rely on scientific data. We recommend for example to refer to the existy RACs (Resistance Action Committee for fungicides, insecticides and herbicides).

With regard to compulsory IPM from 2014, discussions should be initiated as soon as possible to clearly frame the legal borders of IPM, including a clear, precise and unequivocal definition of IPM.

### **Quality**

The reduced availability of PPP impacts not only on the quality of raw material including shelf life (ie fruit and vegetables) but also on their diversity, the choice and the volume.

### **International approach**

There is a need to further consider what is being discussed and developed at international level. In any case the EU farming community needs to have equivalent market opprotunities, the reduction of available crop management tools (PPP) compared to the range of PPP used in third countries put our production at a competitive disadvantage.



[www.ecpa.eu](http://www.ecpa.eu)



[www.copa-cogeca.eu](http://www.copa-cogeca.eu)



[www.euroseeds.org](http://www.euroseeds.org)