

## Position Paper on the protection of crops in (and outside) the EU

PFP is the association for the European primary food processing industry to the European institutions and international organisations. PFP members process approximately 220 Mio tons of raw materials (cereals, sugar beet, rapeseeds, soybeans, sunflower seeds, crude vegetable oil, starch potatoes...) employing over 120 000 people in the European Union.

The issue of the protection of crops and subsequently, plant protection products residues in supplied raw materials remains highly sensitive for the Primary Food Processors. In particular, PFP members face several particular problems directly affecting their (agricultural) suppliers with regard to crop protection products/pesticides:

1. While PFP members strongly advocate for proper raw material storage management, as it is one of the ways to guarantee the safety and quality of primary foods, the lack of residue tolerances for the use of post-harvest and storage treatments on crops can lead to incidental Maximum Residues Levels (MRLs) exceedances. Indeed, cross-contamination from treated crops to other crops may happen during storage. PFP members are committed to solving this problem by raising awareness along the supply chain and with storage actors across the EU.
2. The European legislator defines Maximum Residues Levels (MRLs) for each crop protection product in combination with a specific crop. MRLs and the general safety of pesticides are defined by the European Food Safety Authority (EFSA) following an approval procedure, which is initiated by a Plant Protection Product (PPP) company. The trend in PPP registration over the past 10 years indicates that, overall, there has been a large reduction in terms of the products available to farmers and plant producers. Pesticide developers are increasingly reluctant to seek EU approval because the potential profits from the European Market cannot offset the costs of the approval procedure.
3. Recently, a pesticide developer has chosen - in order to address food safety concerns raised by EFSA - to support the use of a commonly used pesticide in certain crops, but not in others. Given that similar economic considerations apply in all cases where companies are obliged to reduce pesticide use, the implications for the chain are multiple. In particular, the cross-contamination issue makes it impossible to apply different MRLs to different crops and creates a new potential area of legal contention for those operators trading and processing different crops.
4. PPP producers in non-EU countries are also reluctant to seek EU approval for their crop protection products. Approval of pesticides has to be renewed at regular intervals. PPP companies are hesitant to renew them because of their small market size in the EU compared to the rest of the World. A possible consequence is the increased risk that conventional crop imports have residues of non EU-approved pesticides. Shipments cannot be imported bringing considerable economic damage to the European food industry.

## The Vital Link in the Food Chain

5. Reduced availability of multiple authorized PPPs in the farmers' toolkit is leading to pest resistance and the emergence of previously banished pests. As a consequence of the reduced plant protection products choice, the fewer authorized substances are being used to a greater extent and amount. These elements combine to create both an economic and an environmental problem. Lower farm productivity and cost competitiveness (due to lower yields and greater use of plant protection products) reduces resource efficiency and weakens the overall position of the EU food and bio-economy chain. The increased use/dosage of the same pesticides to fight pest resistance is taking its toll on the environment too.

PFP supports the overall policy aim of promoting the development of safer PPPs for the environment, farmers and the population as a whole. On the other hand, a common sense, risk-based approach is needed in order to care for specific crop-pest cases in the interim until a new wave of PPP products will be able to replace the previously existing one. The economic considerations of PPP producers should not be the only determining factor of the competitiveness of EU's food and bio-economy sectors and the EU administration –together with Member States- has a role to play in making a smooth transition to a safer PPP future.

The food chain needs a diversified range of plant protection products to protect their crops and deliver the quality and quantity of safe food required by EU consumers. If these are not available, not only yields will drop, supply will decrease and prices will rise but it will also be increasingly difficult to grow safely some crops in some EU countries, in particular in a context of climate change that is expected to increase the presence of pests.

PFP members believe that relevant competent authorities need to work more closely together to co-ordinate the phasing out of key pesticides alongside the development and use of other means of control, such as pest-resistant crops.

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The **Primary Food Processors of the EU (PFP)** consists of six trade associations:

**European Starch Industry Association (AAF)**  
**European Committee of Sugar Manufacturers (CEFS)**  
**European Cocoa Association (ECA)**  
**European Flour Milling Association (European Flour Millers)**  
**European Vegetable Protein Federation (EUVEPRO)**  
**European Oil and Proteinmeal Industry (FEDIOL)**

PFP represents the European primary food processing industries. It provides the link between agricultural raw materials and final products (secondary processors in the food, feed and non-food sectors). PFP members process approximately **220 million tons of raw materials** (cereals, sugar beet, rapeseeds, soybeans, sunflower seeds, cocoa beans, crude vegetable oil, starch potatoes...) **employing over 120 000 people** in the European Union.