

PFP answers to the [consultation](#) of the European Commission on the proposal for a Sustainable Use of Pesticides that is closing on 19 September.

Thank you for the opportunity to comment on the Commission proposal for a new Regulation on the Sustainable Use of Plant Protection Products. Primary Food Processors (PFP) appreciate the Commission's efforts to reduce the use and risk of pesticides containing more hazardous active substances as well as to increase the uptake of less hazardous and non-chemical alternatives for pest control. PFP also fully supports the aim of reducing the exposure of consumers.

PFP would like to share the following comments in view of maintaining a smooth functioning of the supply chain while ensuring high food quality and consumer safety:

- As primary food processors, our members need **safe, sufficient, quality and affordable agricultural raw materials**. The proposed pesticide reduction targets require a shift in agricultural practices but should be accompanied by an economically viable framework to ensure the continued production and competitiveness of EU's agri-food sector. Targets should be based on the latest economic, scientific, and technological developments.
- Agri-food chain operators should be granted appropriate time to develop sustainable solutions and avoid technical deadlocks in crop protection. Among the possible solutions, PFP recalls the potential of plant varieties obtained by New Genomic Techniques (NGTs) to reduce the use of chemical PPPs. NGTs can make plant breeding faster, more precise and more effective. It is essential to have an appropriate legal framework to promote the development and application of these methods.
- The granting of emergency authorizations for pesticides is handled very differently in the Member States, which leads to uncertainties and competitive disadvantages. PFP welcomes the ambition of the proposed regulation to ensure a better harmonization and level playing field.
- The proposed **Integrated Pest Management (IPM) criteria** would require a double condition to be fulfilled before a chemical pesticide can be used: 1) all other methods have been tested, and 2) an action level has been identified. In practice, this double conditionality is impossible: the use of the pesticides would be granted when it would be too late to ensure a satisfactory crop protection. Damages will already be caused to the crop by the time a chemical pesticide is allowed. To avoid this, the European Commission should maintain the current definition of IPM (Art. 6.3 SUD).
- "**Sensitive areas**" should be better defined in the Regulation. The concept is too vague as there is no clear definition on it. In combination with the anticipated buffer zone of 3 meters, it could exclude large areas of otherwise very productive land. It is unclear which areas will be affected exactly and what the impact will be on the total EU agricultural production.
- **Food safety**: PFP supports the reduction of pesticides given that effective alternatives can be used to ensure and guarantee the production of safe food.

- The requirements of the proposed SUR will have a huge negative impact on trade and competitiveness of European operators on the global market, given that more stringent requirements will apply to EU agricultural production. The EU should ensure strict reciprocity of production standards, notably via appropriate and safe Maximum Residues Limits (**MRLs**) and **mirror clauses**.
- It will be important for farmers and food business operators to have predictability on Member States' **National Action Plans** (NAPs) in relation to the reduction targets in order to put take the necessary efforts in PPP management and development.
- Farmers across Europe need to be supported in the transition towards more sustainable crop protection with access to effective tools as well as the latest innovations and technologies. Moreover, incentives need to be in place to ensure a sustained business model.

Primary Food Processors are committed to collaborate within the supply chain on the efforts to protect human health and the environment through the sustainable use of pesticides. It is crucial that the criteria for reducing the use of PPPs are proportionate, achievable [and consider the specificities of each country] so that:

- They do not lead to a reduction in the local agricultural raw materials' production,
- They do not jeopardise food security in the EU,
- They do not result in a greater dependence of the EU on primary food imports.

The **Primary Food Processors of the EU (PFP)** is composed by:

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

PFP members process approximately 220 Million tons of raw materials (cereals, sugar beet, rapeseeds, soybeans, sunflower seeds, crude vegetable oil, cocoa products, starch potatoes...) employing over 120 000 people in the European Union.