



Agriculture and Progress Memorandum post EP elections 2019

The agricultural community in the EU faces several challenges: produce sufficiently for a growing population, produce sustainably to address environmental and climate change issues, ensure competitiveness in a sector that is exposed to international markets and generate a decent income.

On the EU political, legislative and regulatory front, the farming community is faced with rules that grow stricter; stricter rules under the Common Agricultural Policy, with regard to biofuels, soil protection and irrigation, carbon neutrality and biodiversity. On all these points, farmers and primary food processors are taking action.

Against this background, we wish to highlight some particular developments and files that are challenging our efforts towards progress.

We call upon the elected Members of the 9th European Parliamentary term, the new College of Commissioners taking office in November 2019 and the upcoming Presidencies of the Council of the EU to take the following focal points into consideration and to deal with them in a sensible and operational way. It is important to generate an outcome that satisfies both civil society and the farming community, without depriving the latter of techniques, tools and instruments essential for further agricultural innovation.

1. NEW BREEDING TECHNIQUES (NBTs)

Discussions on NBTs have recently picked up speed. Contributing factors are:

- the 2018 European Court of Justice ruling in Case C-528/16 indicating that mutagenesis leads a priori to products subject to EU GMO legislation;
- the March 2019 report of the European Network of GMO Laboratories (ENGL) on the detection of food and feed plant products obtained by new mutagenesis techniques. This report indicates that several issues with regards to the detection, identification and quantification of genome-edited products are currently based on theoretical considerations and lack any experimental evidence.

Uncertainty and a lack of clarity reign, with potentially diverging rules across Europe, generating **particularly detrimental consequences for maize and beet growers and the downstream processing chain**.

New Breeding Techniques, amongst others mutagenesis, are key in meeting society's growing demand to speed up efforts to further increase sustainability and respect for the environment, concerns maize and beet growers already take to heart today. However, innovation requires time and investments in terms of R&D to overcome technical barriers. The uncertainty currently generated at EU level risks preventing NBTs from becoming mainstream and a permanent part of the agricultural toolbox.

We call for the start, sooner rather than later, of **discussions between decision-makers and stakeholders in view of developing an adapted and workable regulatory framework that addresses the particular nature of NBTs**. This framework must and can in our view combine state-of-the-art scientific expertise and evidence whilst guaranteeing safe and high-quality food with improved properties to consumers. The Agriculture and Progress Platform is keen to play an active role in these discussions in order to generate legal and economic certainty as soon as possible.

2. PLANT PROTECTION PRODUCTS

Reducing the use of plant protection products is an objective that maize and beet growers have set themselves already years ago by committing to Integrated Pest Management. This has in turn led to the use of techniques such as coated/pelleted seeds, optimising crop rotation, precision agriculture,... Developments with regard to robotics and digital farming are also extremely promising.

The more selective use and gradual replacement of certain active substances based on solid, scientific evaluation has already started a number of years ago. The Agriculture and Progress Platform embraces this development. However, we want to issue a warning with regard to the overeager drive to fast-track and extend this process based on arguments that are not science-based. **Stopping the use of all active substances (be they chemical or non-chemical) is neither feasible nor desirable and will generate catastrophic consequences for agricultural production.**

We would like to refer to the findings of a report issued in March 2019 by the European Parliamentary Research Service (EPRS) on the feasibility of farming without plant protection products. Feeding 11 billion people by 2100 with no further land increase for agriculture requires increasing the global yield efficiency and reducing the yield gap. When asking whether this can be done without plant protection products (PPPs) or with reduced PPP use, the report raises significant questions. In terms of 'solutions', the report clearly refers to a combination of actions without eliminating PPPs altogether.

Now that the REFIT on the PPP and MRL regulations has been finalised, we await the proposals the EU Commission could potentially prepare to revise this legislative framework. **We call upon decisionmakers to make sure that the revision of the already strict PPP and MRL legislation must therefore be risk-based as opposed to hazard-based. It must be based on genuine scientific debate, facts and figures instead of alarmist statements.** Although a decline of insects cannot be denied, its location, the speed, intensity and reasons for the decline give rise to diverging scientific views. Science is the only viable foundation to build long-term, sustainable policy for generations to come.

3. BEE GUIDANCE

The EFSA Bee Guidance Document was developed in 2013 to carry out pollinator risk assessment.

However, it was never validated by Member States. It was notably on the basis of this document that EFSA published in February 2018 three reports concerning the bee risk assessment for three neonicotinoids (imidacloprid, clothianidin, and thiamethoxam), ultimately leading to their – in our view unjustified - ban on all outdoor crops.

The **Bee Guidance Document as it stands today is outdated**, with new scientific methods becoming available in the meantime. Furthermore, the **requirements laid down in the document are not feasible due to a lack of validated study methods**. This therefore impacts the outcome of the assessment, as in the absence of data or without clear confirmation of low risk EFSA's conclusion will always be that there is a risk or that a risk cannot be excluded.

The Agriculture and Progress Platform agrees that pollinator risk assessment is crucial. It needs, however, to be based on the most recent scientific findings and methods, must take into account the real risk mitigation measures provided by good agricultural practice (e.g. crop rotation) and should not lead to the complete disappearance of any authorised plant protection product. No to the current Bee Guidance document; yes to a revised Guidance document. **The Platform is keen on engaging in discussions with EFSA, the EU Commission, Member States and other stakeholders to develop this new Guidance. In this context, the Platform is pleased to learn that one of its members is among the stakeholder experts selected on 24th May 2019 to the ad hoc EFSA Bee Guidance Stakeholder Consultation Group.**

4. THE INNOVATION PRINCIPLE

The Agriculture and Progress Platform regrets to see the gradual development of a very unhealthy and antagonistic relation between two key principles that in our view can co-exist perfectly: the principle of precaution and the principle of innovation.

The precautionary principle is key in view of protecting human health and is enshrined in the Treaty of the European Union. Applied proportionally and in the way the EU acquis foresees it, it has a reason for being. The innovation principle is part of good regulation and encourages sustainable growth, as only through innovation can growth and jobs be ensured, and more importantly, societal and environmental challenges be dealt with.

Innovation has been the key to the milestones in human evolution, notably agricultural ones. For example, over the past decades innovation has led to the development and use of coated/pelleted seeds, allowing a reduction of the quantity of active chemical substances and a more targeted application. Plant breeding techniques have allowed to adequately combat pests, by breeding crop varieties that inherently resist them.

To suggest that innovation is a pretext used by industry, to which the farming community is all too often and over-simplistically assimilated, to counter the precautionary principle and to put 'dangerous' products on the market, is quite simply untrue. **Without innovative techniques (see section above on NBTs amongst others), the farming community and its downstream users would be unable to guarantee sufficient high-quality produce for the growing world population.**

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