



Commission Report on the Evaluation of the PPP & MRL Regulations

Alongside the Farm-to-Fork Strategy, the Commission published in May 2020 its REFIT report of the PPP and MRL Regulations aimed at assessing whether the Regulations are still fit for purpose. The report outlines the main findings of the evaluation regarding the implementation and functioning of both Regulations in all Member State and proposes relevant actions moving forward.

Notably, the Commission states that “an EU agriculture entirely without pesticides is not a realistic objective, including in organic farming where a limited number of pesticides may also be used. Use of pesticides is an essential tool to reach the EU’s objectives on plant health, food safety and food security, especially in view of the coming increase in global food demand linked to population growth.”

The Agriculture & Progress platform welcomes this statement. Yet, a proactive and overall coherent approach must be clearly detailed within the strategies of the European Commission for a satisfactory outcome for all EU citizens, including farmers.

The following points should be taken into account:

- Over the past decades, EU farmers have reduced inputs while producing more and better in view of feeding an ever-growing population. In that context, the use of targeted plant protection products (PPPs) has allowed them to grow safety crops and to prevent massive losses and crop failures, as well as increased risks in terms of health, biosafety and biosecurity. Moreover, the risks related to these PPPs have also been reduced thanks to the use of active substances which are safer for both human health and the environment and application of good practices in uses by farmers. Without a safe and effective toolbox at hand, especially where growers already use low levels of pesticides, it is clear that yields will decrease and that therefore not only the supply security will be threatened, but the whole sustainability of the entire agricultural sector will be jeopardized.
- As such, it must be stressed that a fully science-based process must go in hand with procedural rules that support an effective and timely application. Indeed, in line with the report, the current PPP regulatory framework causes instability and unpredictability for investments and serious technical deadlocks, a problem that keeps getting worse with accumulated delays during the assessments. These efficiency problems need to be solved quickly and effectively to avoid jeopardizing the availability of safe and appropriate crop protection tools, a situation which will in turn impact crop yields, safety and quality. Preventing or hindering the appropriate use of all active substances (be they chemical or non-chemical) is neither feasible nor desirable as it can lead to opposite effects in terms of environmental protection and is already having catastrophic consequences for EU farmers. In that respect, the fast-pace reduction of the available active substance and plant protection products when no available alternatives are yet on the market has already created severe technical impasses for crops such as maize and sugar beet.

- Moreover, it is quite clear that restricting the available agricultural toolbox too quickly in this way without ensuring first the availability of sustainable alternative technical tools, including innovative ones such as New Breeding Techniques, will further prevent the farming community from overcoming the above mentioned challenges. Therefore, it is more than ever a matter of urgency to support targeted research and development programmes to speed up the development of these sustainable alternatives.

With regards to the MRL Regulation, Agriculture & Progress calls upon the EU Commission to champion EU farmers as well as the valorisation of their achievements towards sustainability. While the European Union increases its agricultural standards notably in terms of food safety and environmental protection, it is key to align and apply them in all our trade relations to ensure food security, a level playing field and fair competition for EU farmers. Farmers as well as society cannot accept that products that would be illegal to produce in the EU using certain active substances would be allowed to be thus produced in third countries and imported in the EU. In that sense, active substances that are banned in the EU on the basis of both health and environmental concerns should not be authorised through Import Tolerances or MRLs in imported products from third countries. Furthermore, EU bilateral trade agreements should not undermine all the standards that apply to EU farmers. This means that farmers in trade partner countries should apply the same standards as farmers in the EU or failing that no market concessions for the import of the products concerned should be made.

The Agriculture & Progress platform will be a partner in finding a constructive way forward, which will ensure internal coherence across the different European legislative texts and policies regulating PPPs, as well as external coherence in applying the same standards to third countries.

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