



# The Agriculture and Progress Platform's contribution to the EU Biodiversity Strategy for 2030

Nature and agriculture are intrinsically linked and reinforce each other's well-being. The agricultural community cannot prosper and deliver quality food if biodiversity is lost, if soils erode and deteriorate and if they suffer the direct consequences of climate change, such as drought for example. Agricultural biodiversity is essential for satisfying basic human needs for food security. It is actively managed by farmers; many components of agricultural biodiversity would not survive without this human intervention; indigenous knowledge and culture are also integral parts of the management of agricultural biodiversity.

This is precisely why farming communities have made huge efforts over the years, financially and technologically, to put in place sustainable farming practices to respect nature's health and to adapt to always evolving conditions, in particular to the severe impacts of climate change.

**The COVID-19 crisis clearly shows how important it is to continue efforts of investing in healthy ecosystems, of which agriculture is one, so as to always be able to provide safe, nutritious, affordable high quality products to EU citizens and sustainable renewable materials to the EU industry at all times. Not less but more support, notably for innovation, is needed to allow agricultural communities to prosper for the greater good of nature and biodiversity.**

Against this background, the Agriculture and Progress Platform, representing the interest of European sugar beet growers, sugar manufacturers and European maize producers, wants to **highlight some key points the Biodiversity Strategy for 2030 needs to bear in mind** and address as it is being implemented.

- **Plant protection products** are often pinpointed as one of the most important aspects of loss of biodiversity. Reducing the use of plant protection products (PPPs) 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 that have a positive effect on biodiversity such as optimising **crop rotation**, **precision agriculture**, and the use of **pelleted and treated seeds** allowing for a much more targeted use of PPPs, limiting the use of PPPs, avoiding spraying after crop emergence and tackling target organisms while having no or little effect on non-target organisms. Developments with regard to robotics and digital farming are also extremely promising.

Although a decline of insects cannot be denied, its location, the speed, intensity and reasons for the decline give rise to diverging scientific views. Any regulatory activity with regard to PPPs must therefore be realistic and science-based, as it is the only viable foundation to build long-term, sustainable policy for generations to come.

Importantly also, **a reduction of the use of pesticides with a specific focus on high-risk pesticides must be carefully thought through, take into account efforts already made, availability of alternatives and must be accompanied by a thorough and appropriate impact assessment**; agronomic dead-end situations in which farmers are left without valid solutions to protect their crops against certain diseases and pests must be avoided, as this in turn will lead to declining biodiversity. The gap between the rapid loss of active substances and the availability and costs of new tools to manage

plant protection must be addressed. It should be recognized that the reduction of chemical PPPs does not always and automatically allow to reach the objective of reduction of PPPs if alternative sustainable tools do not exist. That is why arbitrary quantitative targets have proven to be unnecessary, unachievable and misleading, while having the potential to severely jeopardize the viability of our sectors.

- **New Breeding Techniques** and innovation are key in meeting society's growing demand for efforts to further increase sustainability and respect for the environment, concerns which maize and beet growers already take to heart today. These techniques can also contribute to maintaining and protecting biodiversity in Europe. However, innovation requires time and investments in terms of R&D to overcome technical barriers. The current lack of regulatory clarity for NBTs prevents them from becoming mainstream and a permanent part of the agricultural toolbox in the EU. A proper regulatory framework must and can in our view combine state-of-the-art scientific expertise and evidence whilst contributing to the objectives of the Biodiversity Strategy for 2030.

Organic farming is certainly a good agricultural practice and can be encouraged. It is however not a practice that is feasible for all, everywhere, and in the medium and even longer-term will not allow responding to the consumption needs of the EU and of the world. **Support for innovation as well as technological and environmental progress should not be redirected from traditional farming to organic farming but should be complementary.**

- **Biodiversity and pollination** are intimately related. The Agriculture and Progress Platform therefore agrees that pollinator risk assessment is crucial, provided it is based on the most recent scientific findings and methods, allows for realistic trade-off between crop protection and protection of pollinators and takes into account the real risk mitigation measures provided by good agricultural practice (e.g. crop rotation). The APP therefore says yes to biodiversity and pollinator protection and notably yes to an adequate and revised Bee Guidance document which is fit for purpose.
- **Soil protection.** Soil is an extremely complex, variable and living medium which performs many vital functions: production of food and other biomass, as well as the storage, filtration and transformation of many substances including water, carbon, and nitrogen. These functions are environmentally as well as socio-economically important.

Processes like erosion, the decline of soil organic matter, soil contamination (e.g. by heavy metals) and soil compaction can reduce the productive capacity of soil. It is in the absolute growers' interest to preserve this valuable resource and therefore to keep soil erosion, soil compaction and soil removal at harvest to a minimum. To achieve this, practices and conservation techniques have been developed. (e.g. crop rotation, intercrop cover, adapted ploughing and tilling with reduced intervention, improved harvesting practices).



- **Fertilizer use** is also seen as a potentially important source of loss of biodiversity. We wish to highlight that oversupplying crops with fertilizers has negative consequences for the grower as it directly impacts the quality of the crop. Based on soil analysis and precision farming, growers apply the right amount of the right fertilizer at the right time depending on crop's need and on available nutrients in the soil. As a result, there is a natural drive for growers not to oversupply the crop with fertilisers. Again, **setting quantitative targets without consulting farmers and without any impact assessment is certainly not the appropriate response, but on the contrary potentially damaging.**
- **The effects of climate change**, as well as the efforts made to face them, affect everyone - but in particular rural communities and agriculture. Agriculture is the economic sector most strongly dependent on natural conditions, including climate. The negative effects of climate change on agriculture are serious and already visible and impact the yield and quality of crops: the impoverishment of the environment; an increase in the frequency and scope of extreme natural events; the increasing variability of the seasons; rises in temperature; changes in rainfall patterns; large scale fires; and the arrival of new pests and diseases.

Farming communities adapt their management decisions and operations to changing local climate conditions, but the magnitude and complexity of current climate change is of particular concern and requires specific efforts. **It is crucial that the EU would support continuous research into new varieties and cultivation strategies** (via its Biodiversity Strategy for 2030 as well as other tools) as well as make efforts (also financial ones) to achieve **better water**

**management and irrigation of crops**, notably by ensuring better storage of water and improved irrigation networks; this will in turn protect against certain climate change factors.

Furthermore, we call for **coherent policy-making**, especially in times like these when pandemic strikes and impacts entire supply chains that will be on the path of recovery for months and years. Any initiative taken in the context of the Biodiversity strategy must be connected to initiatives and decisions taken on the basis of the Farm-to-Fork Strategy and the revised Common Agricultural Policy. Their impact must be evaluated across the supply chain as individual decisions impacting positively some players in the value chain may have detrimental consequences for others. Adding more burdens on farmers alone will not only be damaging but counterproductive. We also count upon the EU decision-makers to **constructively discuss any initiative in-depth with farming communities and primary food processors**.

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