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To: SG INPUT ROADMAPS FEEDBACK

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Your Voice In Europe: ROADMAP feedback for REFIT Evaluation of the EU legislation on plant protection products and pesticides residues (Regulation (EC) No 1107/2009 and Regulation (EC) No 396/2005)

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Related document: REFIT Evaluation of the EU legislation on plant protection products and pesticides residues (Regulation (EC) No 1107/2009 and Regulation (EC) No 396/2005)

Feedback:

The UK farming unions represent approximately 70,000 farmers whose businesses are the bedrock of the country's £108bn agri-food industry. Farming covers more than 70% of the UK's landmass. Farmers are the stewards of this land and the various environments upon it. Here follows both general and specific comments on the roadmap presented.

General approach

The opportunity that this assessment presents is very welcome. As the document states, PPPs are indispensable for agriculture, though use comes with responsibilities to safeguard operators, the environment and the public. This is something farmers take seriously and we are fully supportive of measures that protect public and environmental health. Yet this must be balanced with meeting another core, essential

objective of the legislation: to safeguard of the competitiveness of European agriculture and improve agricultural production. We believe that a risk-based approach to regulation in this area can best strike this balance. Once hazards are identified and characterised, the risks to all should then be independently assessed using the best available scientific evidence. As stated, as farmers proactively manage these risks, there should be open dialogue on how this can best be achieved. We have already shown our commitment to such an approach in the UK with schemes such as the Voluntary Initiative and these efforts should be recognised.

Specific to the Roadmap

Section C.1 contains a comprehensive list of topics to be covered. We recognise that Directive 2009/128/EC on the sustainable use of pesticides will not be covered in this review. However, it is also essential to understand the link between this legislation and elements of 1107/2009. For example Integrated Pest Management is a suite of tools and methods that farmers have long made use of and is further promoted under 2009/128/EC. Uptake of this approach must be recognised in the review of 1107/2009, as well as its limitations.

Another topic that we feel should be covered is the build-up of resistance in weeds, plant pests and diseases. Regulation 1107/2009 has clearly led to a reduction in the number of active substances to tackle various pests with few replacements. Reliance on fewer substances increases the likelihood of resistance, which is being reported increasingly by our members for certain pests. Furthermore, fewer active substances can lead to more reliance on any genetic resistance a crop may have. Such genetic resistance can break down over time and the break down can be accelerated. Consequently plant breeding is put increasingly under pressure too. This phenomenon must be given due attention not just for its effect on farming, but for the maintenance of environments and habitats too.

There is no reference in the document to the regulation's effect on innovation. Given the issue described above on resistance, innovation is increasingly important to help farmers overcome pest problems both with active substances and alongside alternative means. The effect of regulation on this, and the efficacy of said innovations, should be examined.

Under section C.2 unintended consequences are to be considered. An area that we believe should be examined in this context is the predictability and consistency of the regulation. We are concerned that due to differences in the approaches of competent authorities, and the politicisation of specific active substances, certainty in the process and relevant authorities is undermined. This has a negative effect on farmers' business as it leads to uncertainty of how pests can be overcome. This has a direct effect on planting and business decisions. It also has the potential to undermine the market orientation of agriculture as farmers are uncertain if they will have the tools to respond to market signals and exploit opportunities that others globally are able to.

In attachment to this document is an independent report that assesses the impact of the loss of PPPs on the UK agriculture and horticulture sectors as well as the wider economy (The Effect of the Loss of Plant Protection Products on UK Agriculture and Horticulture and the Wider Economy). We are firm in our belief that such assessments

must be considered when regulating in this area. Such evidence should be considered under section D.2 of the roadmap. This is not an exercise isolated to the UK. It has been carried out at the European level too in the form of the report Low Yield: Cumulative impact of hazard-based legislation on crop protection products in Europe. This independent report was supported by the UK unions along with Copa-Cogeca, thus highlighting the importance of this for all European farmers.

With regard to Section D.4 and elements of the consultation process, we would like to stress that that the quality and integrity of submissions must be assessed alongside their quantity.

We remain fully available for any further comment and look forward to actively engaging with the further consultation process.

Feedback file:

[AndersonsReport.pdf](#)