

## **The Sustainable Use of PPPs Regulation raises serious concerns for the future of the European food system**

The European Landowners' Organization (ELO) acknowledges that the proposal for the Regulation on Sustainable Use of Plant Protection Products (PPPs) the Commission published today was a needed landmark in adapting chemical substance use to current needs and trends, such as precision farming, Integrated Pest Management (IPM) or better availability of monitoring data. The ELO is however concerned that some of the provisions pose serious threats to food security, land and biodiversity management agreements, and rural business sustainability.

The ELO welcomes the more attention paid to sustainable methods such as Integrated Pest Management (IPM) within the new proposal. Precision farming will also be key in achieving a more sustainable use of chemical substances.

Nevertheless, the 50% reduction targets (for the use and risk of chemical PPPs and the use of more hazardous PPPs), with the possibility of raising the bar even higher (to 65%), but not lower (than 35%) are unreasonable. Given the knowledge and tools that we have so far in the EU, farmers and landowners will be unable to reach the objectives of the proposed regulation without seriously prejudicing the viability of their businesses.

Calculations should better take into account country specificity, as well as the lack of effective alternatives and tools. The lengthy and complicated process of approving new substances for use within the EU makes the farming community question the viability of the current Farm to Fork timeline. We have less than 10 years left to reach ambitious goals, while the approval process for new substances usually takes more than that.

There is also the lack of predictability regarding the values of the Harmonized Risk Indicators that makes achieving the set goals particularly challenging. Should several active substances be moved from one hazard group to the other, then the Member States' progress from one year to the other could be on a relatively negative trend, even if further cuts in volumes will have been made.

Furthermore, including all Natura 2000 sites under sensitive areas is breaching all previous agreements. Preserving biodiversity is of key importance for landowners, but having an interdiction to use plant protection products on 18% of EU's agricultural land (the total area under Natura 2000 – Habitats and Birds directives) is unjustified. In most cases, these sites are already in areas with natural constraints, therefore imposing even more restrictions would only severely endanger the feasibility of farming activities in Europe.

Finally, we should not ignore the topic of food security. The world is facing a food crisis, with lack of supply and soaring prices, putting more and more people under food insecurity. Europe should therefore be part of the solution (not the problem) and keep its net-exporter status, providing less developed parts of the world with safe food.

The ELO calls for a more balanced approach in the Council and Parliament debates that are to start on this legislative proposal. As key players in the supply chain, landowners and farmers need to be supported, not prevented from making the transition to a more sustainable food system.

**For further information, please contact:**

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**About the ELO**

The ELO is the umbrella organisation for national rural organisations of businesses managing agricultural, forestry and environmental land all over Europe.

European Landowners' Organization

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