



EU grower groups working together to identify and address minor use issues

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Introduction

Introduction (I)

Two organisations....

Copa

Created in 1958, Copa represents 23 million European farmers and family members

Cogeca

Created in 1959, Cogeca represents 22, 000 European agricultural cooperatives

Copa and Cogeca

In 1962, a joint Secretariat was created, making it one of the biggest and most active lobby organisations in Brussels

Introduction (II)

Mission

To ensure a viable, innovative and competitive EU agriculture and agri-food sector

Who ?

66 Member organisations and 34 Partner Organisations
25 agricultural sectors covered





Current situation of minor uses and specialty crops in the EU

Current situation of minor uses and specialty crops in the EU (I)

Importance of Minor Uses

- MU/SC issues impact products such as fresh vegetables, ornamentals, hops, frozen vegetables, tobacco, seeds or rice
- Around 3% of total European Utilised Agricultural Area (UAA)
- Mostly vegetables, fruits, nurseries and flowers: €70 billion EU production value
- 20% of total EU agri-production value
- Specialty crops provide diversity in diet: wide range of variety
- High speciality crops mostly on high specialised farms

Current situation of minor uses and specialty crops in the EU (II)

Main challenges

- Crop protection solutions not available mainly due to high costs of development
- Lack of involvement and participation from all EU Member States (financial constraints, language barrier, knowledge available)
- Magnitude of impact of pest problems similar to major crops
- Economical impact on farm level is very high
- Resistance build up if no rotation in active substances
- Emergency authorizations are not long term solutions
- Distortion of competition at EU level

Current situation of minor uses and specialty crops in the EU (III)

Current developments

- Rough figures claim that 30-60 Million EUR are used across MSs to find solutions
- Several expert commodity groups exist under the framework of the North/South Europe technical working groups on minor uses
- Participation of technical experts from national authorities, research institutes, professional organizations, industry
- Regular plenary meeting between EU Stakeholders and MS representatives
- European Database on Minor Uses and Specialty Crops (EUMUDA)
- Coordination Facility in place since 1 September 2015



European legislative framework

European legislative framework (I)

Official regulatory framework

- Regulation 1107/2009 concerning the placing of plant protection products on the market
- (Regulation 396/2005 on maximum residue levels of pesticides)
- (Directive 2009/128/CE on sustainable use of pesticides (SUD))

Market secondary standards

European legislative framework (II)

Official regulatory framework

- Regulation 1107/2009 concerning the placing of plant protection products on the market
 - **Definition:** *'minor use'* means use of a plant protection product in a particular Member State on plants or plant products which are:
 - (a) **not widely grown** in that Member State; or
 - (b) widely grown, to meet an **exceptional plant protection need**;
 - *By 14 December 2011, the Commission shall present a report [...] on the establishment of a **European fund for minor uses**, accompanied, if appropriate, by a **legislative proposal***
 - **List of Minor Uses (Specialty Crops):** *Member States shall establish and regularly update a list of minor uses*

European legislative framework (III)

– Authorisation procedure: EU vs national

- *The **Authority** [European Commission] shall establish the format for its conclusion which shall include details concerning the evaluation procedure and the properties of the **active substance** concerned*
- ***Member States** may authorize **plant protection products** containing active substances approved [...] only when it is necessary to control that serious danger to plant health in their territory*
- *The holder of an authorisation [...] may apply for an authorisation for the same plant protection product, the same use and under the comparable agricultural practices in another **Member State** under the **mutual recognition** procedure, provided [...]*

European legislative framework (IV)

- “Candidates for substitution” and comparative assessment
 - *the **consequences on minor use** authorizations are taken into account*
- Extension of authorisation for minor uses
 - ***Member States** may take measures to **facilitate or encourage** the submission of applications to **extend** the authorization of already authorized plant protection products **to minor uses***
- Emergency authorisations
 - *[...] in **special circumstances** a Member State may authorize, for a **period not exceeding 120 days**, the placing on the market of plant protection products [...]*

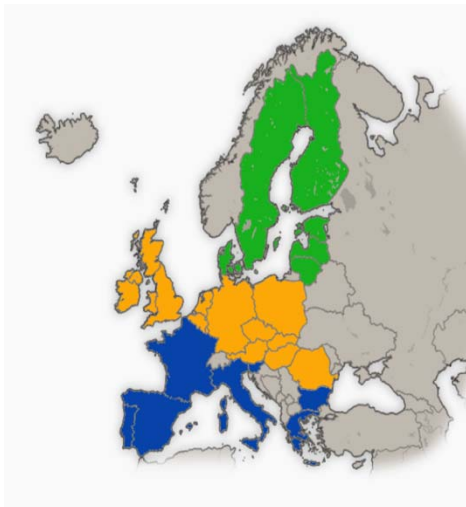
European legislative framework (V)



European legislative framework (VI)

– Mutual recognition

- Scope:
 - *authorizations granted by one Member State should be accepted by other Member States where agricultural, plant health and environmental (including climatic) conditions are comparable*
- Aim:
 - *mean of ensuring the **free movement of goods** within the Community; to **avoid any duplication of work**; to **reduce the administrative burden** for industry and for Member States; to provide for more **harmonised availability of plant protection products***
- *By 14 December 2014, the Commission shall present a report [...] on the functioning of mutual recognition of [...]. The report may be accompanied, if necessary, by the appropriate legislative proposals to amend those provisions.*

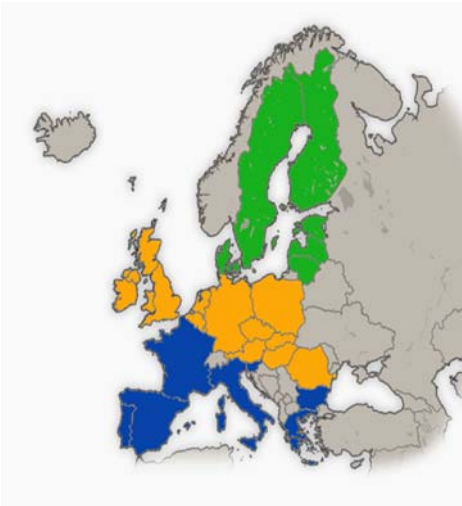


European legislative framework (VII)

- Effects on minor uses and specialty crops depend on:
 - ***how the zonal system works in practice***
 - ***how mutual recognition is applied***

BUT...

- In practice:
 - ***national authorities still require efficacy data on the registration system***
 - ***acceptance of biological efficacy data from other countries is essential***



European market framework (I)



European market framework (II)

Market secondary standards

Retailer	% of legal mrl		% of ARfD		Number of A.I.
	A.I.	Total	A.I.	Total	
ALDI	70%	80%		80%	3 till 5 depending commodity
EDEKA	70%		100%		maximum 5
EDEKA own band	50%		70%		maximum 5
KAISERS TENGELMANN	70%	150%	70%	100%	
KAUFLAND	33,3%*			100%	3 till 5 depending commodity
METRO	70%		70%		
NORMA	80%		80%		maximum 5
REWE	70%		70%		maximum 5
REWE own brand	50%		70%		maximum 5

*: specifique list for lettuce

European market framework (III)

Market secondary standards

- Farmer complies with all legal requirements (food quality and safety)
- Unbalanced power in the agri-food chain
- Demanded by major retailers relating to price setting and condition for sales (positive/negative lists and number of active substances)
- Are not always based on science
- Go beyond official governmental requirements (e.g. MRLs)
- Disproportionate burdens on small- and medium-sized producers
- Also linked to food waste
- PPP - Industry fails to react on this major problem



Shortcomings and actions

Shortcomings and actions (I)

Shortcomings

- Loss of active substances: endocrine disruptors, neonicotinoids...
- Obstacles to mutual recognition within same zones
- Not unique list of minor uses and specialty crops / no definition
- National assessment for alternatives to Candidates for Substitution
- Lack of commitment: delay for the Coordination Facility, not enough funds



Shortcomings and actions (II)





Actions taken by EU farmers

- Ensuring cooperation within the Agri-food Chain:
 - Agri-Food Chain Coalition
 - Agri-Food Chain Roundtable (AFCRT)
- Collaboration roadmap with International Biocontrol Manufacturers' Association
- Other collaborations

Shortcomings and actions (III)

- Agri-Food Chain Coalition
 - Europe’s agricultural and food business interests
 - Better and smarter policy-making
- Agri-Food Chain Roundtable (AFCRT)
 - Seeds, farmers, processors, traders and phytosanitary industry
 - Coordinate efforts on Plant Protection legislation
 - Lobbying activities (EU Parliament, European Commission)

A call for a coherent policy on plant protection solutions, including minor uses



December 2014; updated June 2015

Shortcomings and actions (IV)

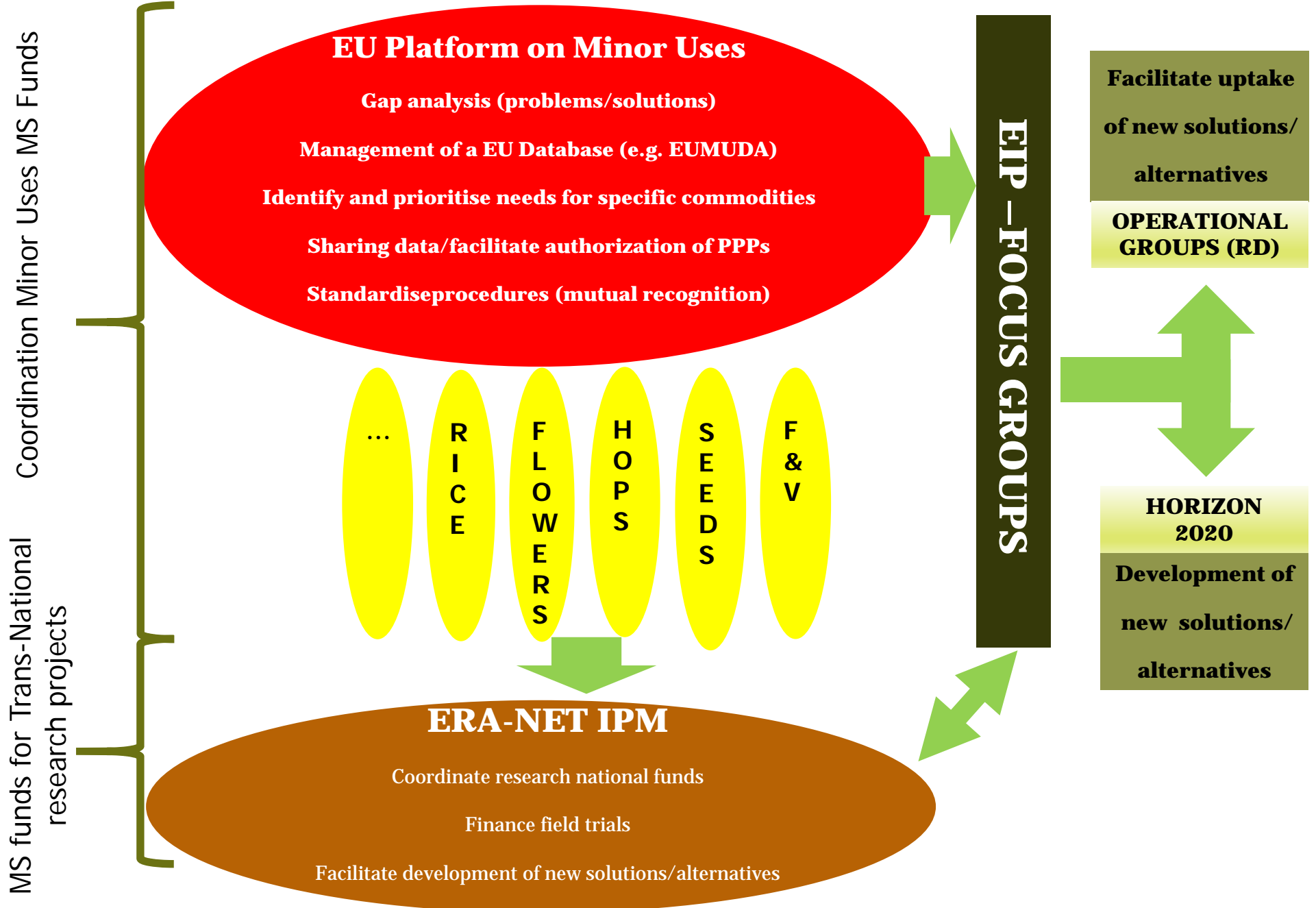


- Collaboration roadmap with International Biocontrol Manufacturers' Association
 - Co-operation in EU Minor Uses and Specialty Crops
 - Low-risk active substances and products
 - Lobbying activities (EU Parliament, European Commission)
- Other collaborations
 - Societal effects of hazard-based legislation on crop protection products in Europe

Shortcomings and actions (V)

- Coordination Facility (CF)
 - *By 14 December 2011, the Commission shall present a report [...] on the establishment of a **European fund for minor uses**, accompanied, if appropriate, by a **legislative proposal** (Regulation 1107/2009)*
 - *On 18th February 2014, Report from the Commission [...] on the establishment of a European fund for minor uses in the field of plant protection products*
 - Commission partly funding a CF of an independent central secretariat which coordinates the work between Member States and stakeholders
 - Total budget: 700.000 €/year (committed just for the first three years) only 50 % coming from EU
 - Appointment of coordinator: 1st September 2015
 - Delay: more than 2 years for the report and almost 4 years to start

EU Programme on Minor Uses and Specialty crops





Proposals and recommendations

Proposals and recommendations (I)

Phytosanitary aspects

- Crops grown on less than 200 000 hectares (roughly equivalent to 0.2% of cropped area) should be considered as minor crops in the whole of the EU
- Apply mandatory mutual recognition
- Facilitate registration
- Find strategies where no PPP are available
- To develop chemical and non-chemical solutions for these products, according to IPM principles
- Promote / facilitate alternative solutions (e.g. Biological PPP)
- Allocate EU research funds for MUSC

Proposals and recommendations (II)

Functioning aspects

- **Bottom-up approach: ensuring Farmers and Agri-Cooperatives' involvement**
- Financing of research projects (e.g. data generation) to find solutions
- Support field trials
- All Minor Uses and Specialty Crops taken into consideration
- Important to work together and save time and money - Coordinated approach amongst all Member States/ expert technical groups and stakeholders
- Sharing of info (database with problems/solutions, statistics)
- Integration/coördination of EU programmes with GMUS



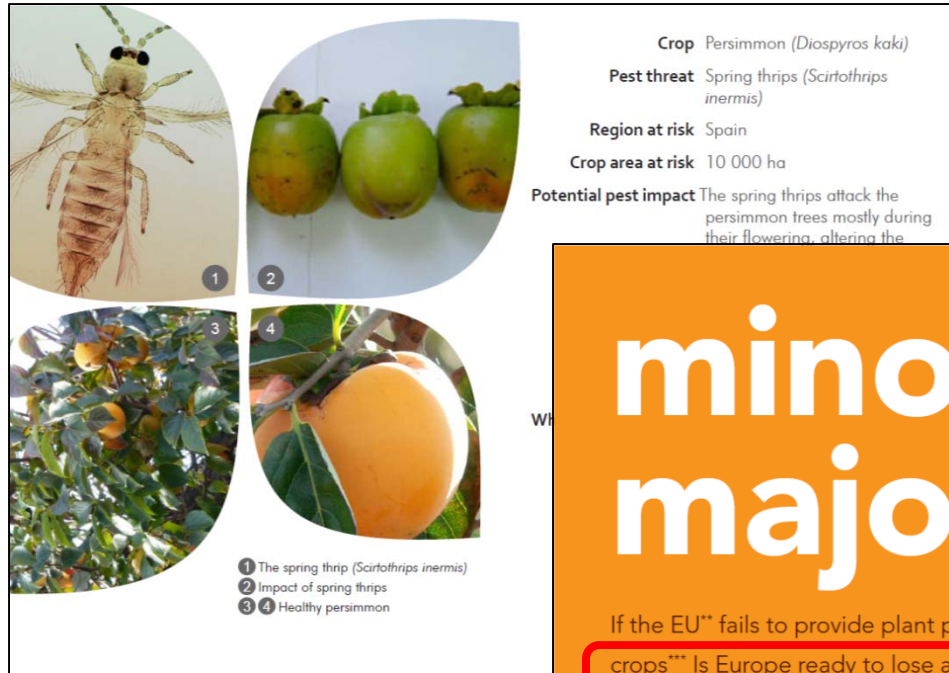
Conclusion

Conclusions (I)

- EU competent authorities are very reluctant in dealing with MUSC
- PPP industry is very active in “ greening programmes “, less in MUSC
- Both are hoping that farmers are doing the work and paying the bill (twice)
- Nice work is done in the technical groups where some MS and stakeholders are taking the lead, having big positive results
- More of this cooperation/ collaboration is needed
- Implementation of Mutual recognition in MS should be imposed by EC
- Big pressure on all kind of AI will influence MUSC in the first place
- Growers and PO are doing there part , please join/help us

because

Conclusion (II)



Crop Persimmon (*Diospyros kaki*)

Pest threat Spring thrips (*Scirtothrips inermis*)

Region at risk Spain

Crop area at risk 10 000 ha

Potential pest impact The spring thrips attack the persimmon trees mostly during their flowering, altering the

Wh
**minor use
major value***

If the EU** fails to provide plant protection solutions for minor use and speciality crops*** Is Europe ready to lose a market worth €70 billion/year, representing 22% of the total value of annual EU agricultural output?

* An awareness raising campaign promoted by the EU Agri-Food Chain Partners (AREFLH, CELCAA, COCERAL, Copa-Cogeca, ECPA, ESA, Freshfel, IBMA, PROFEL and Union Fleurs)

** European Commission, Council of the European Union, European Parliament, and Member States

*** Minor uses concern crops grown on relatively small acreage like fruits, herbs, and vegetables, cereals, including rice, seed crops and small crop seed treatments, hops, flowers and all those plants that need a tailor made plant protection product, whether it is for growing them, storage or transportation



Thank you for your attention

www.copa-cogeca.eu