## **International Confederation of European Beet Growers**

CONFEDERATION INTERNATIONALE DES BETTERAVIERS EUROPEENS

CONFEDERAZIONE INTERNAZIONALE DEI BIETICOLTORI EUROPEI



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## Regulation on the sustainable use of pesticides Sugar beet growers call for pragmatic solutions and for a regulation reconciling European food sovereignty and improving farming practices

European sugar beet growers did not wait for the EU Green Deal to commit to constantly improve their sustainability: good practices to allow a decrease of inputs, notably Integrated Pest Management (IPM) practices such as crop rotation, choice of resistant/tolerant varieties and crop monitoring, are widely applied. However, the endless burdens and depleting toolbox to allow efficient and sustainable crop protection are now a real challenge: severe yield reductions, crop failure and **technical dead-ends, endangering the future of sugar beet cultivation and sugar production/sovereignty in Europe.** 

Supporting our food sovereignty and the improvement of farming practices should be supported by a real strategy of innovation and investments. Instead, the Commission proposal for a regulation on the sustainable use of plant protection products (SUR) suggests **arbitrary reduction targets on chemical pesticides**, while **being very vague on the tools to implement alternative solutions**.

The implementation of Integrated Pest Management (IPM) in sugar beet cultivation is the norm in European regions. By imposing additional conditions and burdens on IPM practices, **the proposal ignores that IPM practices are already widely applied**, **questions the expertise of farmers**, puts them in a defensive position when they use chemical pesticides and imposes unrealistic workloads and administrative costs on them.

Moreover, the proposal reiterates the support for alternatives to the use of chemical pesticides, but deliberately ignores the reality regarding the pace of development of such alternatives and the reality regarding their actual availability, affordability, effectiveness, and sustainability. This timing issue is crucial. As far as New Breeding Techniques are concerned, the Commission, while recognising that these offer the potential to speed up the development crop varieties resistant or tolerant to insect and fungal attack, does not intend to speed up the regulatory discussion but to maintain its too long timetable. This is highly regrettable.

Furthermore, with this proposal, the European Commission failed to present any comprehensive impact assessment of the implementation of the reduction target for chemical pesticides on EU agriculture, stating only that any adverse impacts on costs and prices could be "compensated" by the CAP budget through amended National Strategic Plans, recognising implicitly that farmers revenue would be the "adjustment variable" of this policy.

The Commission also omitted to mention any **impacts on yield/production or carbon leakage**. The additional proposal by the Commission to put at zero the Maximum Residue Limit or Import Tolerance of neonicotinoids is also far from sufficient. The SUR should also contain provisions as regards the actual use of active substances banned in the EU by third countries exporting products obtained from crops on which such banned active substances are used to the EU.

To conclude, this legislative proposal as it stands is a denial of the reality and not respectful to farmers who would be expected to bear income decrease. CIBE is ready to contribute so that the points mentioned above can be addressed and the proposal improved. CIBE reiterates its call to assess properly the impacts of this proposal. CIBE will also be attentive regarding the development of an 'analysis on food security drivers' as announced by the Commissioner for Health and Food Safety and recommends including the beet/sugar sector in this analysis.

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