

# International Confederation of European Beet Growers

CONFEDERATION INTERNATIONALE  
DES BETTERAVIERS EUROPEENS

CONFEDERAZIONE INTERNAZIONALE  
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INTERNATIONALE VEREINIGUNG  
EUROPÄISCHER RÜBENANBAUER

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## CIBE Position Paper on the Commission's Farm to Fork & EU Biodiversity 2030 Strategies Commission Conference 14-15 October 2021 EP Plenary vote 20-21 October

The European Commission is organizing the 2<sup>nd</sup> edition of the “Farm to Fork” conference on 14-15 October 2021, just before the World Food Day 2021. The Farm to Fork conference 2021 will focus on the progress made on the initiatives foreseen in the Farm to Fork strategy's (F2F) action plan, support the EU's efforts to achieve a global transition to sustainable food systems and put emphasis on transition enablers.

The timing of this conference is all the more relevant as it is taking place just ahead of the vote in the European Parliament on the report on this strategy, at a time when the Joint Research Center's (JRC) long-awaited Technical Report exploring the potential effects of the strategy's targets is being discussed, when several other impact studies are being published and analysed and finally at a time when the US Department of Agriculture has launched its counter call on Sustainable Productivity Growth for Food Security and Resource Conservation on the occasion of the United Nations Food Systems Summit late September 2021. Amid this context, CIBE would like to share its following position with the EU institutions.

1. The Commission's F2F strategy is based on quantitative targets that will have to be reached by European agriculture and farmers by 2030. The four most important targets are: a 50% reduction in pesticides and in the use of most hazardous pesticides, a reduction of nutrients loads (a 50% reduction in nutrient losses and a 20% reduction in fertilizer use), at least 25% of the EU's agricultural land under organic farming, and the objective of 10% of agricultural area under high-diversity landscape features.
2. In its contribution to the consultation on this strategy in March 2020, **CIBE has highlighted in particular that arbitrary targets and deadlines were unnecessary, inappropriate and not feasible, but that incentives such as rapid access to new tools & techniques (such as New Breeding Techniques) as well as financial support should be promoted and implemented for the improvement of sustainability.** In more details, CIBE documented the progress achieved so far in the reduction of inputs in sugar beet growing and its involvement in the improvement of good practices, with strong credentials provided through its EU Beet Sugar Sustainability Partnership. CIBE had also stressed that:
  - a. impact assessments, including environmental & economic impact assessments, should be carried out for all decisions made in the F2F Strategy;
  - b. the F2F Strategy and the revision of the Directive on the sustainable use of plant protection products (SUD) must address the gap between the rapid loss of active substances and the availability and costs of new tools to ensure crop protection;
  - c. if any objectives are introduced in the future Farm to Fork Strategy, they should be carefully defined and assessed in the light of availability of alternatives tools, be pragmatic and realistic and applicable for and to all;
  - d. arbitrary quantitative targets were unnecessary, unachievable and misleading.

## NO MISLEADING ARGUMENTS PLEASE, BE ACCOUNTABLE

3. CIBE notes the **endlessly repeated communication line by the Commission**, largely echoed by NGOs, that the JRC Technical Report, based on a modelling exercise, overestimates the results and is not an “impact assessment as such”. This argument is **completely misleading** for several reasons:
- Firstly, **almost all impacts assessments carried out by the Commission in the field of EU agriculture or trade policy are based on a modelling exercise** (using largely the CAPRI model for agriculture) **which inherently and in all cases entails limitations** and cannot but ignore some elements of reality. This is why such exercises generally include additional sensitivity analyses that attempt to tackle these limitations (the change in consumption pattern is taken into account in the modelling exercise on the annual agricultural markets outlook, change in currencies can be analysed in impact assessments on trade agreement etc.). In this regard, CIBE regrets that the JRC did not include in its Technical Report a sensitivity analysis integrating the potential impact of Brexit. But such limitations do not prevent the Commission to consider all these other analyses as “outlooks” or “impact assessments” and to communicate largely on them despite their inherent limitations. **There is no reasons considering in this specific case the modelling exercise as ill-suited and not in all others cases.**
  - Secondly, the **findings** of the JRC Technical Report are **confirmed by all other assessments** based either on case studies, empirical analysis or on other modelling methods. It is worrying that the Commission disregards these other studies conducted by academic institutions or by the industry.
  - Thirdly, the JRC Technical Report includes some highly **optimistic assumptions**, notably in terms of adoption rate of new technologies. Thus, its **findings can be considered as underestimated and not overestimated**. The reality from the fields, the agricultural technical institutes, the phytopharmaceutical industry, the biocontrol industry and the breeders is clear: no innovative solution, be it low risk PPPs, new bio active substances, new varieties, new digital equipment will be available at a large scale before 2028.
  - Fourthly, if reduction targets are accompanied in the JRC modelling by average changes in costs and yields, applied all over the period, the authors do not clearly envisage in their sensitivity analysis certain shocks, for example due to the consequences of potential crop failures. Such **shocks** would have additional extremely negative consequences on production in the short and long run.
  - Fifthly, the claim that inaction would even be more detrimental is not relevant: **nobody is calling for inaction.**

## ADDITIONAL IMPACT ASSESSMENTS URGENTLY NEEDED

4. Therefore, CIBE calls on the Commission to end this sterile communication, to be accountable for its proposals, to **provide as a matter of urgency any additional sensitivity analysis, complementary or “comprehensive impact” assessment** it considers useful, and to open a transparent debate, notably together with academic institutions that have carried out similar analyses.

## BUT FACTS ARE FACTS AND FLYING FROM LOGIC IS NOT THE SOLUTION

5. **Facts are nevertheless facts.** CIBE notes that all the studies and impact assessments on the consequences of F2F and Green Deal targets on EU agriculture and EU farmers confirm the **magnitude of the challenges and lead to similar findings, of which in particular for arable crops: a significant decrease in yields and EU production, a major deterioration of the EU trade balance, an increase in consumer prices and a decrease in farmers’ revenue.** CIBE cannot but stresses that European sugar beet growers are already experiencing huge challenges and increasing risks in the protection of their crop, with negative consequences on production and costs that have been quantified.
6. The production losses would worsen the EU bloc’s net trade position (exports minus imports) in particular for cereals and other arable crops, to such an extent that it would not only have huge impacts

domestically in terms of food security and loss of competitiveness, but also on world markets and markets in countries which are traditional destinations for EU exports. This implies considerable and potentially destabilising impacts on neighbouring importing third countries.

7. All studies expect significant increases in EU prices for most agricultural products. These price increases appear totally unsustainable due to the opening up of the EU markets to world markets but also simply because it would not be sustainable for EU consumers (and retailers). The authors of the JRC technical report themselves recognise the difficulty to tackle such large price differentials that will occur between EU domestic and world markets. It is also **all the more surprising that consumers' associations close their eyes to these logical developments of prices, inequalities that will follow in the access to food and minimize them.** Looking at the reactions today on the increase in prices of some food commodities, notably by consumers, how can these associations applaud to such an outlook?
8. As a consequence of cost increase and yield decrease, **farmers' revenues** would fall for nearly all product categories considered to a very impressive extent, as confirmed in all studies, including that of the JRC.

### **DO NOT AVOID DEBATE, DEBATE AND ENSURE LEVEL-PLAYING FIELD BEFORE DECIDING**

9. Given the shocks these strategies would represent for farmers and agricultural sector, one would consider that their environmental impacts would be impressive. But that is not even the case. In terms of environmental benefits, all studies expect the farming sector's GHG emissions to fall but more than a half of these gains, if not all, would be lost because of agricultural production moving to third countries (**carbon leakage**) or because of a **reduction in carbon sequestration!** This is, at the very least, extremely embarrassing. **CIBE considers extremely worrying that so far there has been no in depth debate between the EU Institutions on the consequences of these carbon leakages and on how to address them.**
10. CIBE recalls the **crucial necessity of consistency of a Farm to Fork Strategy with the EU trade policy: it is crucial to agree on ambitious and solid rules or "mirror clauses" on sustainability** in all our trade relations to ensure food security, level playing fields and fair competition for EU farmers, to restore growers' confidence in 21st century EU trade policy and to avoid decline and abandonment, in particular of sugar beet cultivation in the EU. **These new rules must be agreed before any ambitious objectives in terms of EU agricultural sustainability be adopted.**
11. To conclude, this strategy should raise strong concerns among the stakeholders and the EU Institutions in terms of the EU's food security, the EU's role on world markets and the EU farmers' living conditions. **The reasonable way forward is certainly not to reinforce these targets by making them binding, but to re-think this strategy, to act to make it realistic, practical and effective for farmers and society. It is time to discuss other ways to reach ambitious objectives in terms of agricultural sustainability and productivity.** Members of the European Parliament must not let EU farmers down into disarray: it is them who are at the forefront, who are acting and who will suffer the consequences of bad policies.