

A Green Agenda Meets Reality – Almost Four Years of Green Deal Implementation

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Volker Koch-Achelpöhler
Agricultural Relations Director, Europe
Gowan Crop Protection, Ltd.





Overview

1. Green Deal ambitions in a changing political environment
2. Farm to Fork Strategy – The rocky road from vision to implementation
3. Chemical Strategy for Sustainability – What toolbox is left?

1. Green Deal Ambition in a Changing Political Environment





The Green Deal Ambition – Important Objectives

- Reduce the **environmental and climate impact** of food production and consumption
- Ensure **food security** and access to nutritious food for all
- Foster **innovation** and **competitiveness** in the agri-food sector
- Protect human health and the environment from **hazardous chemicals**
- Support the global transition to sustainable agri-food systems through **trade policy** and **international cooperation** instruments



The Green Deal – Agriculture and Pesticides

- The **Farm to Fork Strategy**
 - Reduce EU Pesticide Use & Risk
 - Enable innovation in agriculture
 - Make trade greener
- **Chemical Strategy for Sustainability**
 - Proposals impacting the availability of active substances in Europe
 - Ban of production and/or export of substances not approved in EU



EU Policy Developments – The Big Picture

- **Food security** back on EU agenda
 - Russia's unjustified war against Ukraine re-emphasized the vulnerability of global food systems
 - Political stability in Europe at risk (inflation, migration, security)
 - Food security considerations start to counterbalance green EU policies.
- **Agriculture and pesticides**
 - Regulatory developments remain challenging
 - Policy makers start to understand that reduction of chemical pesticide needs the availability of comparably effective alternative tools



Timing matters – Political Mandates Coming to an End

- **Current mandates** of European Parliament and EU Commission will **end in 2024**.
 - Elections to the European Parliament in May 2024
 - Term of current EU Commission ends in late 2024
- Legislative Proposal that are not finally agreed between the Member States and the European Parliament by March 2024 will not be finalized under the current mandates.
- Future of legislative proposals that have not been completed is uncertain.

2. Farm to Fork – The Rocky Road from Vision to Implementation





Sustainable Use of Pesticides – Targets & Measures

Quantitative Targets to be achieved by 2030

- 50% Pesticide Reduction in Use and risk
- 50 % Reduction for more hazardous pesticides
- 25% of EU agricultural land to be under organic production

Key measures

- Use of all plant protection products banned in sensitive areas.
- Though IPM rules (non-chemical alternatives to be preferred by growers, de-facto product listing, immense record keeping requirements for farmers)
- Strict monitoring & control = enormous administrative burden for Member States



Sustainable Use of Pesticides – Far from Being Agreed

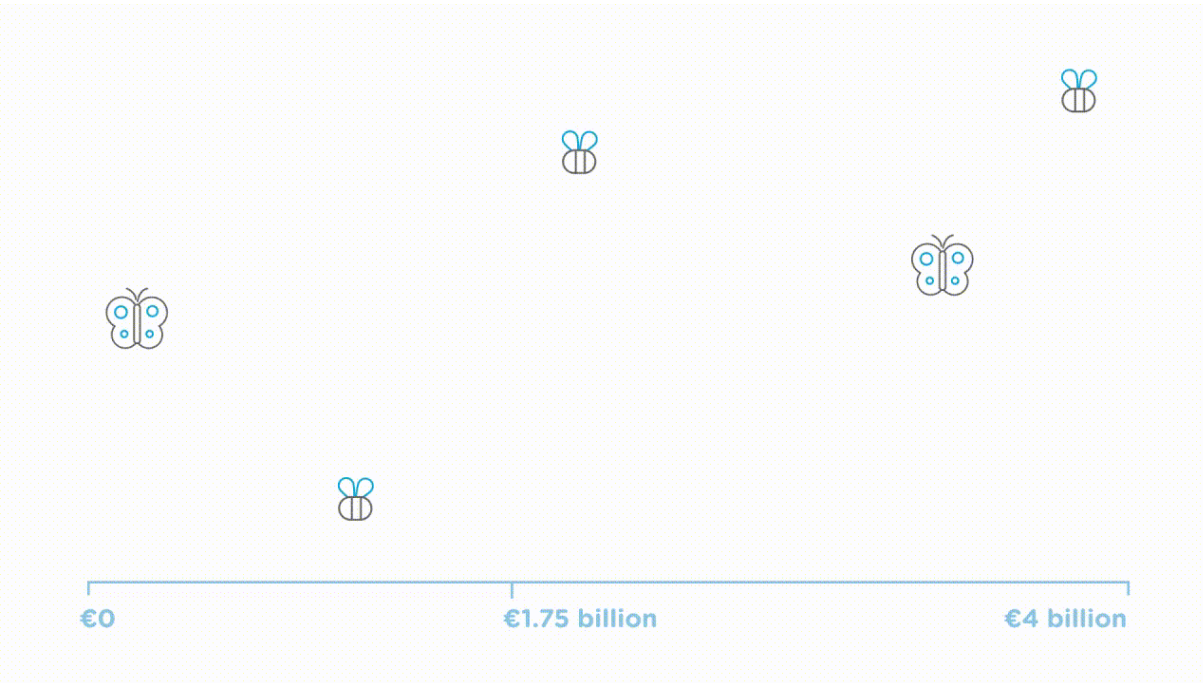
- Severe opposition of a large group of EU Member States against the EU Commission proposal
- Conservatives (EPP) in the European Parliament demand rejection of entire proposal
- Greens want to further tighten the EU Commission proposal
- **Conclusion:** It might become extremely difficult to achieve a common position between European Parliament and Member States within the current mandate



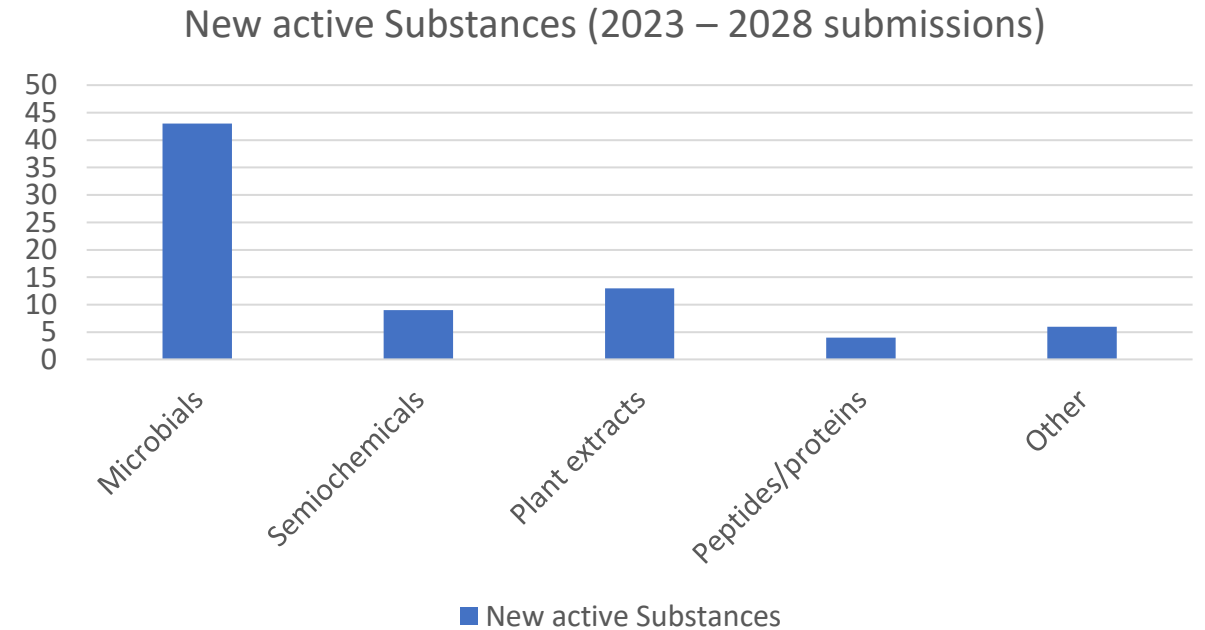
Enabling Innovation in Crop Protection – Fiction or Reality?

- Drastic reductions in the use of chemical pesticides are, if at all, only possible if alternatives are commercially available and comparably cost effective and efficient
- Alternatives in focus
 - Biological plant protection products
 - Plants deriving from the use of new breeding technologies
 - Digital and precision agriculture
- There is growing concern about the availability of alternatives and the direction and pace of an enabling regulatory framework

Biocontrol – Industry committed to substantial Investments



Source: <https://croplifeeurope.eu/commitments/2030-commitments/>



Source: IBMA Development Pipeline Update, 2023. 26 companies completed the survey representing 15% of the 160 companies actively developing biocontrol



Biocontrol – Regulatory Barriers

- The EU's current regulatory system is
 - too slow
 - not predictable
 - not proportionate
- Removing regulatory blockages and better implementation of the authorization process for active substances is urgently needed
 - More guidance documents
 - More expertise on biopesticides
 - Provisional authorization of new active substances



Plants Deriving from New Genomic Techniques (NGTs)

- Court of Justice of the EU ruled in 2018 that NGTs fall under the EU GMO legislation.
- Commission legal proposal (plus impact assessment) regulating NGTs expected for June 2023.
- Possible critical elements of the proposal
 - Risk assessment and approval requirements
 - A sustainability analysis to determine whether and how these products contribute to sustainability
 - Traceability and labelling provisions

2. Chemical Strategy for Sustainability (CSS) – What Toolbox Is Left?





CSS at A Glance

- Published in October 2020 - consists of more than 80 initiatives indicating direction or initiating legislative proposals.
- The overarching objectives of the CSS include
 - better protection of human health and the environment from hazardous chemicals,
 - boosting innovation for safe and sustainable chemicals and
 - enabling the transition to chemicals that are safe and sustainable by design
 - CSS considered as first step towards the zero-pollution ambition for a toxic-free environment



CSS – The Regulatory Approach

- CSS targets chemicals in general, sectoral legislation is largely ignored
- Key initiatives with direct impact on Crop Protection Products:
 - Introduction of **new hazard classes** in the CLP regulation (PMT and vP/vM), to then reference these new classes under the pesticide regulation (e.g., as possible new cut-off criteria).
 - Proposal to **ban all PFAS substances** which could affect manufacturing (e.g. substances used only in the production process).
 - Development of new elements under REACH impacting co-formulants: **Mixture assessment factor** to account for multiple exposure to chemicals, or grouping for **Generic Risk Approach**



CSS – Possible Impact (I)

- Cumulative impact study commissioned by CropLife Europe shows potential for severe effects
 - almost 100 out of 450 substances used in Plant Protection Products (PPPs), currently evaluated as safe for use, could disappear from the market
 - Up to 80% of available active substances could be classified as PMT/vPvM if criteria are strictly applied as in a PPP context
 - It would impact 70% of the different Modes of Action (MOAs) available to growers. Fungicides would lose 6 unique MOAs, herbicides 5 and insecticides 7



CSS – Possible Impact (II)

- Proposals would **disproportionately challenge** growers of main **grain crops** including maize and cereal as well as **oil crops** (sunflower and canola). No EU grower would be without additional challenge as a result of CSS implementation
- Given the importance of plant pathogenic fungi on yield the **impact on fungicide availability** that the CSS implementation would have, is of particular concern



CSS – Impact on Wheat Growing in France

- Importance of Wheat in/from France
 - Globally 5th largest producer of wheat
 - Largest exporter of wheat in the EU, number 5 globally
 - Net exporter of wheat, exports particularly important for Middle East and Northern Africa
- Worst case impact
 - Yields to decrease by 25% to 30%
 - Loss in Gross Margins: 50% to 74%
 - Total Economic Impact: - 1,4 bn € to - 2,02 bn €



Conclusions & Outlook

- Extent and speed of EU Commission ideas to restrict availability and use of chemical pesticides is worrying
- There is no EU regulatory ecosystem that sufficiently facilitates innovation in plant protection and plant breeding. This needs to be urgently changed - first steps towards improvement are perceptible
- The legislative proposals on the table or in the pipelines would have a potentially devastating impact on EU agriculture and broader effects on food security and food affordability
- A growing number of EU Member States and the Members of the European Parliament want a more balanced consideration of ecological, social and economic sustainability. This gives hope.



Why all this is relevant for Third Countries?

- The Green Deal is a global mission
 - Pressure on a growing number of substances that are banned in the EU (export ban for active substances, import restrictions for crops treated with these substances)
 - Green Diplomacy and trade agreements as additional means to export Green Deal thinking
- The likelihood that EU agriculture's competitiveness will suffer from actual policy developments is high. Therefore, the EU could flirt with protectionist measures that come in the guise of environmental protection and sustainability.



Thank you for your attention!

Volker Koch-Achelpöhler

phone: +32 470 82 34 62

e-mail: Vachelpohler@gowanco.com