

The Swedish Crop Protection Association's position on Farm to Fork

The Swedish Crop Protection Association, the trade association for Swedish crop protection companies, has studied the Commission's Farm to Fork strategy and takes this opportunity to present its view on those parts of the strategy that concern crop protection products.

The Swedish Crop Protection Association supports the vision in Farm to Fork and considers it an important part of the Green Deal. We believe that it is important for the EU to have efficient, sustainable food production, and that it has high ambitions when it comes to tackling climate change, protecting the environment and preserving biodiversity.

However, regarding the use of chemical crop protection products, we believe that the strategy has very major and serious shortcomings. This is particularly clear when it comes to the use of and risks associated with crop protection products in Sweden.

The Swedish food strategy, with its goal of "*a competitive food chain in which food production is increasing*", should be the starting point for Sweden in its ongoing work. The importance of nationally reliable, resilient food production, of which crop protection is an absolutely crucial component, has been clearly highlighted during the Covid-19 crisis and must not be underestimated.

The strategy states that the Commission intends to take measures to reduce the total use and risk of chemical crop protection products by 50% and to reduce the use of more hazardous crop protection products by 50%.

The Swedish Crop Protection Association would like to present its views on the reduction goals for chemical crop protection products in Farm to Fork in the following five points.

1. As far as the figure-based reduction targets are concerned, the Swedish Crop Protection Association believes that the principles for these must be clarified. Moreover, a thorough analysis is required of the consequences of the goals. A necessary impact assessment includes the competitiveness of production, agriculture and food production, and of course climate and environmental aspects too.

2. The Swedish Crop Protection Association believes that it is remarkable and extremely serious that the strategy, with regard to the reduction goals for crop protection products, completely disregards the Commission's own analysis of crop protection

product legislation. On 20 May 2020, the Commission's evaluation report on the regulations concerning crop protection products and residues was published. The report clearly states that the regulations fulfil their purpose and are effective in protecting human health and the environment. We are therefore highly critical of the fact that Farm to Fork still appears to lack confidence in the way crop protection products are regulated – by assessing, evaluating and managing risks in a regulatory framework based on scientific grounds – in a very meticulous approval process for substances and products that involve low and acceptable risks.

3. The Swedish Crop Protection Association knows with certainty that Sweden has come a long way in terms of which crop protection products are used and also in terms of how these crop protection products are used. Swedish use is currently low and needs-oriented, and reflects very well which crops are grown and how pressure from pests varies from year to year.

Statistics show that Sweden has made significantly more progress than most other EU countries and usage has already been reduced significantly in terms of both volumes and risks (**Figures 1 and 2**). If reduction targets are to be discussed at all, it is absolutely necessary to take into account the fact that countries have achieved different levels of progress and that the conditions differ greatly between different countries. The year taken as the starting point is also particularly interesting and absolutely crucial.

4. The time horizon to achieve a 50% reduction is defined in the strategy as the year 2030, i.e. in less than ten years' time. The Swedish Crop Protection Association wonders and views with some concern what this might mean in terms of productivity? When such an extensive reduction in the use of effective crop protection products is being discussed, there is a very great need for innovations and alternative technologies. The Swedish Crop Protection Association's members are continuously focusing their research on new products and methods to meet farmers' demands and to comply with all regulatory requirements. For obvious reasons, these are time-consuming processes, and if there is no new substance, product or method at the planning stage today, it will not be available in 2030.

5. An isolated focus on chemical crop protection is neither reasonable nor relevant. We are convinced that consideration for the environment and health and a commitment to climate and biodiversity can be combined with effective crop protection, chemically or in some other way. What is important is the end result in terms of productivity and consequences. In our view, the future of crop protection means a respectful balance between the needs of nature, agriculture and society. Unfortunately, the occurrence of pests, weeds and diseases will not decrease, regardless of the method of cultivation. Being one step ahead is an ongoing challenge for all farmers, and this is at the very heart of the Swedish Crop Protection Association's activities. Focusing on goals without scientific relevance, as in Farm to Fork, is not the right way forward. We must instead look for solutions that produce the best that science has to offer.

The Swedish Crop Protection Association is keen to contribute to future discussions. We believe that partnerships between sectors and dialogue between different stakeholders, nationally and at a European level, are necessary and need to be

strengthened in order to achieve ambitious goals for agriculture and food production in Sweden and Europe.

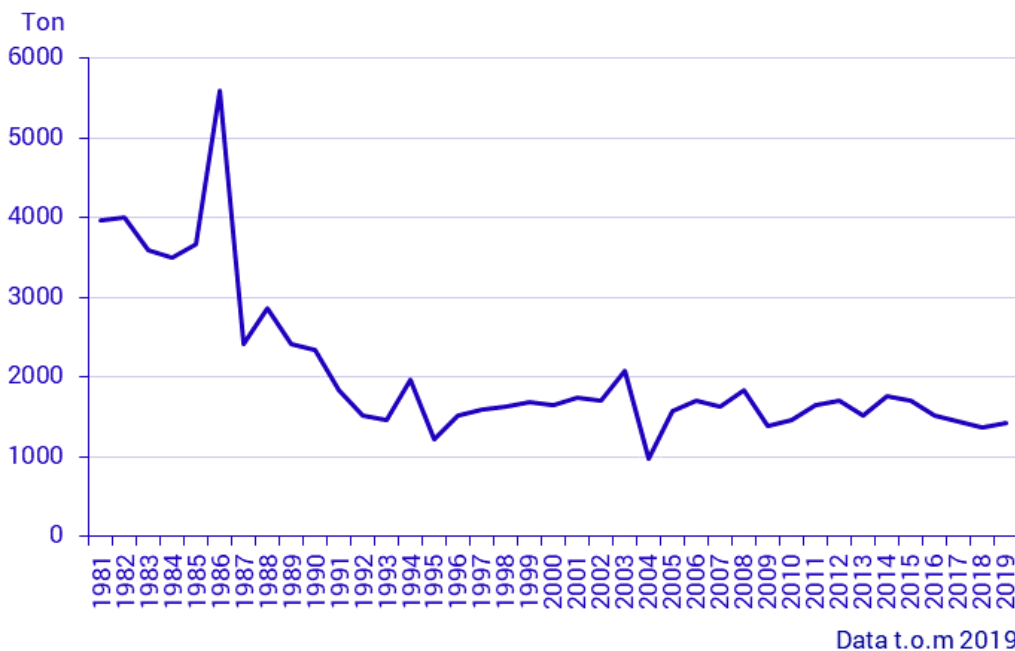


Figure 1. Volumes of active substance sold to the agricultural sector in Sweden. Source: Statistics Sweden

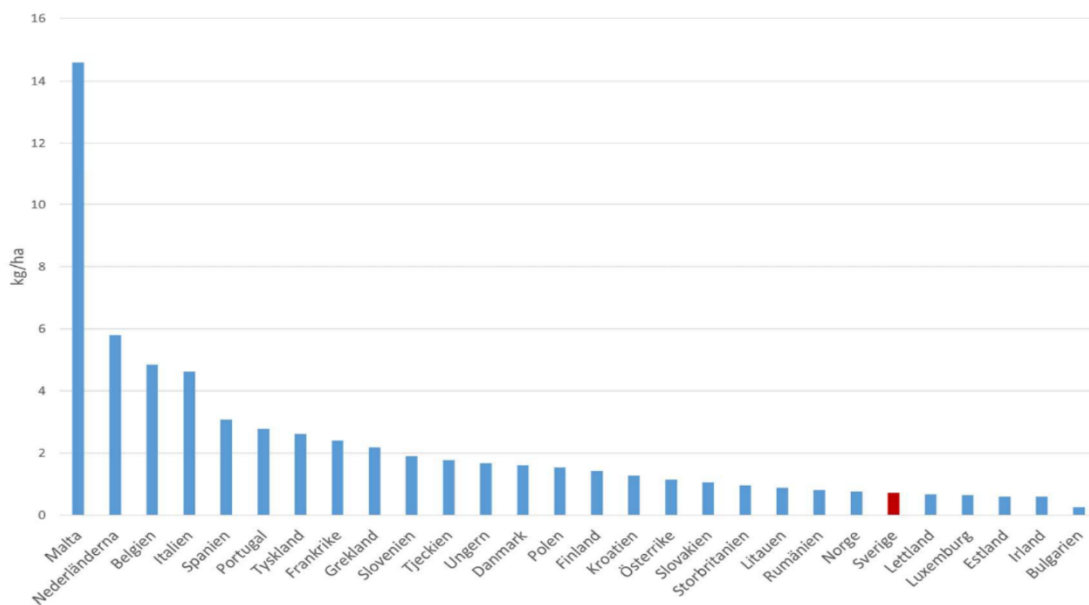


Figure 2. Pesticide sales in kg/ha. Source: European Environment Agency, figures from Eurostat, 2017.