BTO: Participation of E4 at the annual meeting of the Agri-Food Chain roundtable for plant protection

DATE: Wednesday, 03 July 2018

VENUE: European Seeds Association (ESA), Rue des Arts 52, Brussels

PARTICIPANTS:

Representatives of 24 associations regularly taking part in the Agri-Food Chain Roundtable for plant protection:

AREFLH – Association of Regions producing fruit and vegetables,
CELCAA – Committee for agriculture trade association,
CIBE – International confederation of beet growers,
COCERAL – European association representing the trade in cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agro supply,
COPA-COGECA – European Organisation for agricultural organisations and cooperation,
ECPA – European Crop Protection Association,
ESA – European Seed Association,
ESA – European Snacks Association,
EUPPA – European Potato Processors Association,
EUROMAISIERS – Organisation representing the European maize milling sector,
EUROMALT – Trade association representing the EU malting industry,
Europatat – European Potato Trade Association,
European Flour Millers,
FEDIOL – Federation representing the European Vegetable Oil and Proteinmeal Industry,
FEFAC - European Feed Manufacturers' Federation,
FERM – The Federation of European Rice Millers,
FoodDrinkEurope – European food and drink industry,
FRESHFEL EUROPE – Association representing the European fresh fruit and vegetables supply chain,
FRUCOM – European traders in dried fruit, edible nuts, processed fruit & vegetables, processed fishery products and honey,
IBMA – Worldwide association of biocontrol industries producing microorganisms, macroorganisms, semiochemicals and natural pesticides for plant protection and public health,
PRIMARY FOOD PROCESSORS – European primary food processing industry,
PROFEL – European Association of Fruit and Vegetable Processing Industries,
STARCH EUROPE – Trade association which represents the EU starch industry,
UNION FLEURS – International Flower Trade Association.

SANTE
The chair of the meeting, [Frucom] (Frucome) welcomed the SANTE representatives and invited the representative of COPA-COGECA to give a short presentation on the main topics for discussion:

- Criticism of the hazard based approach as set out in Regulation (EC) No 1107/2009 and its implications for MRL setting and its impact on international trade
- The negative impacts of the new criteria for endocrine disruptors, with a possible high number of substances falling under the new ED criteria,
- The problems for minor uses, the reduction of approved active substances and the lack of products authorised in Member States,
- Misleading communication to consumers on pesticides, bad image of pesticides,
- Need for transitional measures in MRL Regulations that consider agricultural cycles as well as long shelf life products, interpretation of the term “produced”,
- The difficulties with the introduction of revision 3 of the EFSA PRIMo model for exposure assessment.

The atmosphere of the meeting was rather tense with a lot of criticism directed to COM as regards the issues listed above.

The group called on the COM not to apply the hazard based criteria in the renewal process but to strictly follow a risk based approach instead, both for taking approval decisions and when setting MRLs. SANTE representatives made it clear that the hazard based criteria were laid down in a Council and Parliament Regulation since 2009 and were therefore binding law. COM explained that in the area of MRLs an approach has now been agreed with the Member States in which the full evaluation procedure set out in Regulation (EC) No 396/2005 will be followed when assessing MRL applications (incl. import tolerances). This is also in line with the WTO/SPS agreement and responds to concerns from third countries.

Members of the group also feared that a high number of active substances may fulfil the new criteria for endocrine disruptors and that generally less and less substances will be available for use in PPPs. They called on COM to more proactively deal with the shrinking number of suitable substances. COM replied that this was a request that should be directed to the Member States as they are the ones responsible for granting product authorisations. COM agreed that MS were too slow in authorising products with approved active substances and that mutual recognition was not working as it should. COM underlined that the overall number of active substances approved has not changed over the years and that the cut-off criteria have never been a reason by themselves not to approve a substance as there had always been other concerns as well.

On minor uses COM was criticised for not extending its funding for the Minor use facility (MUF). This was rejected by COM since from the beginning of setting up the MUF it had been made clear that the COM funding would not exceed 3 years and that funding should then be taken over by Member States.

A long discussion took place on the responsibility for communication on pesticides issues with the public, but also with retailers. The group felt the COM should take a more proactive role. COM recalled that it had consistently underlined the need for evidence-based decision making despite heavy criticism in high-profile cases and stated that communication should be the main task for stakeholder organisations, both at European and at national level and that COM could not take such a role that requires extensive resources and a main focus of action.
at national level. COM suggested that the organisations represented seek contact with consumer organisations and NGO's. One participant criticised the proposal for the amendment of the GFL to be not ambitious enough on communication – COM underlined that the details of that part of the proposal are expected to be worked out later in implementing/delegated acts. COM also pointed to the latest infographics on its website that intended to provide clear and easy-to-understand information on the pesticides legislation.

On the transitional measures for MRLs, COM updated the group of the progress made in the last PAFF in which general criteria for setting transitional measures were discussed. It also made it clear that crop cycles could not be systematically considered as they can vary around the world. Legal procedures and timelines were explained and always ensure a delay between the vote on a measure and the actual application date (on average 12 months). COM also stated that stakeholders should play a key role in informing food business operators and third countries about upcoming regulatory changes at the earliest possible stage and that already the TBT notification on the possible non-approval of a substance contains a warning as regards the possible lowering of MRLs.

On the Primo model revision 3 the group remarked that the new revision can give different outcomes than the previous version. COM replied that this is clear as the new revision contains more updated and accurate consumption data. A clear implementation plan was agreed with the Member States, so that the new revision only applies to application made after its introduction on 1 February 2018.