

Community Plant Health Regime ECPA Position Paper

ECPA welcomes the opportunity to contribute to the revision of the Community Plant Health Regime (CPHR). In this respect, we would like to state the following:

- **An up-to-date understanding of the situation**

The key objective of the Community Plant Health Regime (CPHR) lies in protecting the EU against the harm caused by the introduction and spread of harmful organisms.

In view of the challenges currently faced by the EU, we believe that it is essential to **have an up-to-date understanding** of the situation to allow appropriate measures. We therefore welcome the Community Plant Health Regime evaluation objectives to assess the impacts of the key EU defies and in particular the effects of climate change, ensuring food security in light of food prices and globalization towards a competitive agriculture.

- **Pesticides play a decisive role in fighting against pests and harmful organisms**

Harmful organisms have very detrimental effects to yields or quality and can cause serious agricultural losses. Prevention is the first step to avoid their occurrence and the CPHR plays a key role here (e.g. phytosanitary certification, quarantine measures, border controls and inspections). A combination of techniques is needed to control these and pesticides have a major role to play therein. However, once the pests occur, the nature per se of the pests or their ability to adapt or build resistance to controls means a choice of efficient plant protection tools is necessary to cope with the harmful organisms spreading. In such situation and as prescribed by Directive 2000/29, eradication is often the only solution to avoid them spreading. Pesticides are **often the key and only tools available** designed to fight and control the spread of harmful organisms. They also help contain the emergence and spread of invasive species which could become potential harmful organisms and important new pest species, particularly in a period of significant climatic change. This has been recognised in the *Terms of Reference* for the evaluation of the Community Plant Health Regime¹. Accordingly, DG SANCO further states that *“The yield of agricultural and horticultural crops can be severely reduced as a result of infestation by pests and diseases. In order to protect crops before and after harvest, plant protection products are used²”*.

- **Pesticides are already regulated**

Pesticides are highly regulated by several layers of European legislations. The placing of pesticides on the market is currently covered by Directive 91/414 and will be further strengthened by Regulation 1107/2009. This ensures that only products passing through strict government testing are authorized for use. Rigorous scientific assessments further make sure that their use is safe for both the human health

¹ *“Harmful organisms of limited economic importance which can be controlled under good plant protection practice with for instance crop rotation and pesticides (hundreds of thousands of these exist and it will not be feasible to regulate all).” Terms of reference for the consultant, Evaluation of the Community Plant Health Regime, DG SANCO, 2009.*

² EU Action on Pesticides Factsheet, DG SANCO, 2009.

and the environment. In addition, we believe in the use of our products as much as necessary and as less as possible.

Furthermore, Directive 2009/128 on the sustainable use of pesticides provides a legal framework covering the whole use phase of pesticides, which will be implemented by Member States taking into account subsidiarity.

- **Loss of plant protection solutions**

What needs to be noted in addition is that the number of available active substances has been severely reduced from over 1000 substances in 1991 to 250 at the end of the review process. In order not only to ensure in the future an efficient CPHR, but also to ensure proper plant protection for all crops, enough solutions to adequately fight harmful organisms need to be available. This has been recognised in the *evaluation report*³.

The Community Plant Health Regime should therefore not serve as another tool to restrict the availability or hamper the use of pesticides as this is already covered in the legislations mentioned hereinbefore.

- **Climate change will have effects on harmful organisms**

Climate change and its effects will exacerbate the difficulty to control harmful organisms, whilst new ones will appear. This is well recognized by the European Commission which stated that *“Climate change will threaten animal wellbeing and could also impact plant health, favouring new or migrant harmful organisms, which could adversely affect trade in animals, plants and their products”*⁴. With this challenge, Europe needs to equip itself with the best available techniques to ensure harmful organisms are well kept under control. Pesticides are one of the most efficient tools to reach this goal.

³ *“Concerns have been expressed by certain stakeholders on the potential implications of the anticipated limited availability of PPPs due to the limited number of permitted active substances. The trend in PPP registration over the past 10 years indicates that, overall, there has been a large reduction in terms of the products available to farmers and plant producers (...) As a result, for some pathogens on some minor crops, no chemical solution may be available. This situation could create an issue for plant health as control of certain pathogens may not be possible if no authorised PPPs are available. (...)The reduction of active substances available for control measures may also lead to a situation where for a certain pest or even group of pests, only one family of products is likely to be available creating a risk of the development of pesticide resistance, as it becomes almost impossible to rotate the PPP used.”* Evaluation of the Community Plant Health Regime, final report, May 2010.

⁴ European Commission, White Paper on adapting to Climate Change: towards a European framework for action, COM (2009) 147.