



Committee of the European Starch Potato Producers' Unions

Proposal for a Regulation on the Sustainable Use of Plant Protection Products

(COM (2022) 305 final, 22.06.2022)

CESPU Position

CDG Arable Crops – Starch, 20th October 2022



Proposal on Sustainable Use Regulation (SUR)

- Presented by COM on 22 June 2022
- to **implement stricter rules on the use of plant protection products (PPP) by 2030**, to meet the targets of
 - European Green Deal / Strategies Farm to Fork and Biodiversity / Zero-pollution action plan, Fit for 55 ...)
- the existing Plant Protection Framework Directive (Directive 2009/128/EC) has been transformed into a regulation that is directly applicable in each Member State.
- Legally binding targets at EU and national level
 - **to reduce by 50%** the **use** and the **risk of chemical pesticides** and the use of the more hazardous pesticides by 2030
 - **A ban of all pesticides in sensitive areas** (urban green areas, protected areas in accordance with Natura 2000 and any ecologically sensitive area)
 - Application of **Integrated Pest Management** (IPM for each culture) is mandatory, Member States have to establish crop-specific rules identifying the alternatives to be used instead of chemical pesticides.
 - Stricter rules for **documentation**: mandatory electronic register for use..

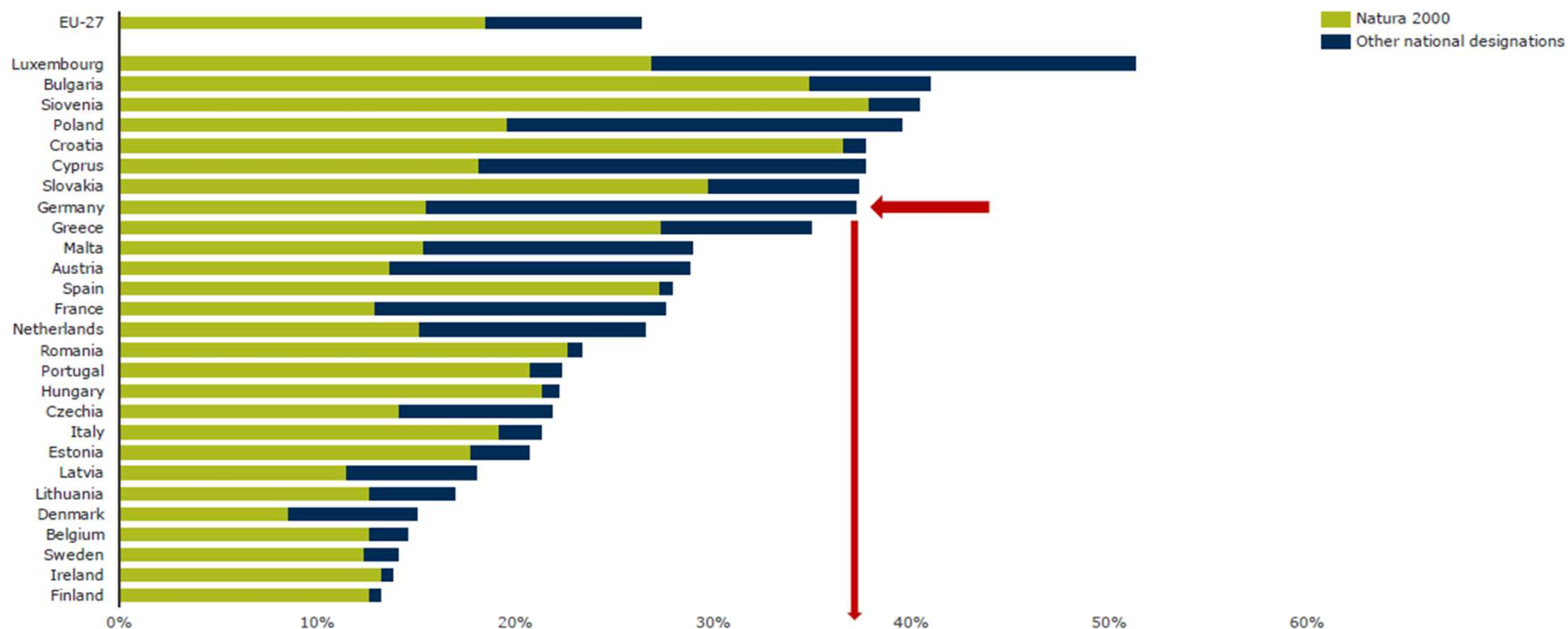
CESPU rejects the SUR proposal, it needs to be fundamentally revised!



No consideration of overlapping crises; significant income losses for farmers; structural breaks in agriculture and agribusiness; effects on consumer level.

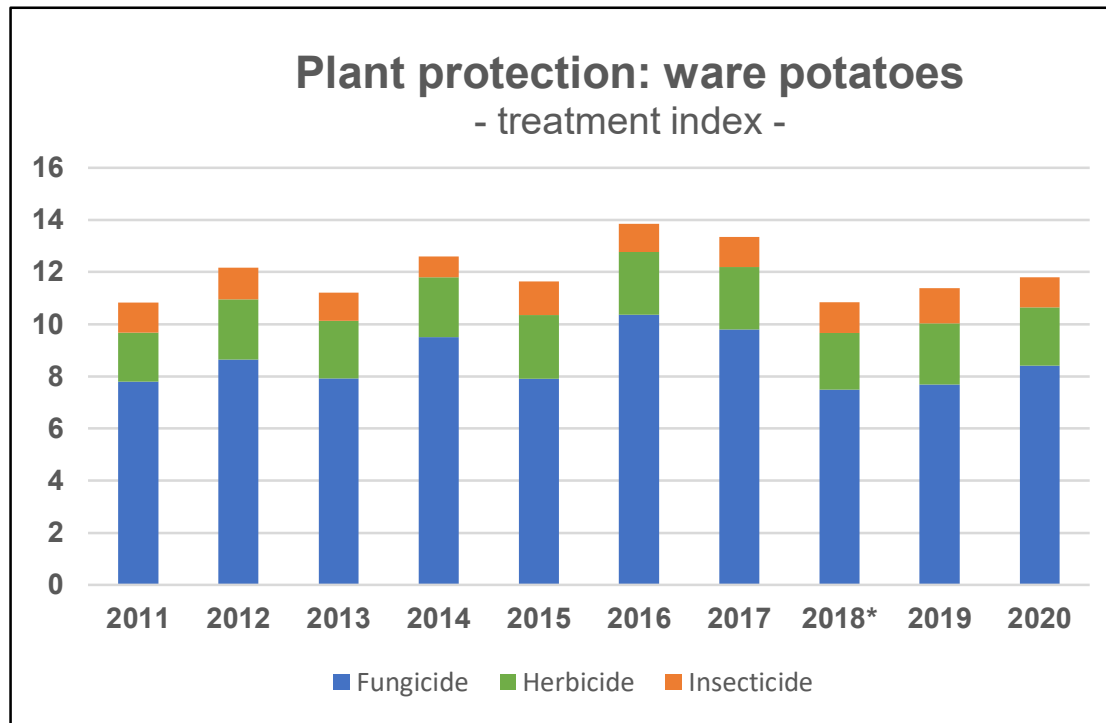
- Fact based assessment needed, with all 3 pillars of sustainability (economic, environmental, social)
- Central questions (decline of agricultural production, supply of food, impact on prices, relocation of production outside of EU with lower standards) are not treated seriously enough
- Ignoring of progress in the sustainable use of pesticides made in last years
- As long as no suitable and practicable alternatives available, no further substantial reduction of PPP in potato farming is possible
- Access to all suitable and practical plant protection measures needed, including potato varieties from modern plant breeding as well as precision farming tools
- Sensitive areas: definition (DE = 30% of agricultural area); ban of pesticides means no seed potato production possible; great uncertainty in production of other potatoes
- 50% reduction of PPP: at least 30 – 50% less yields, quality losses; increasing prices; income losses; major effects along the entire value chain, including consumer level; competitiveness
- Education and training are further key components to reduce use and risks of PPP
- No further bureaucracy

Chart — Share of country designated as terrestrial protected area between Natura 2000 and national designations in 2021



Source: DBV

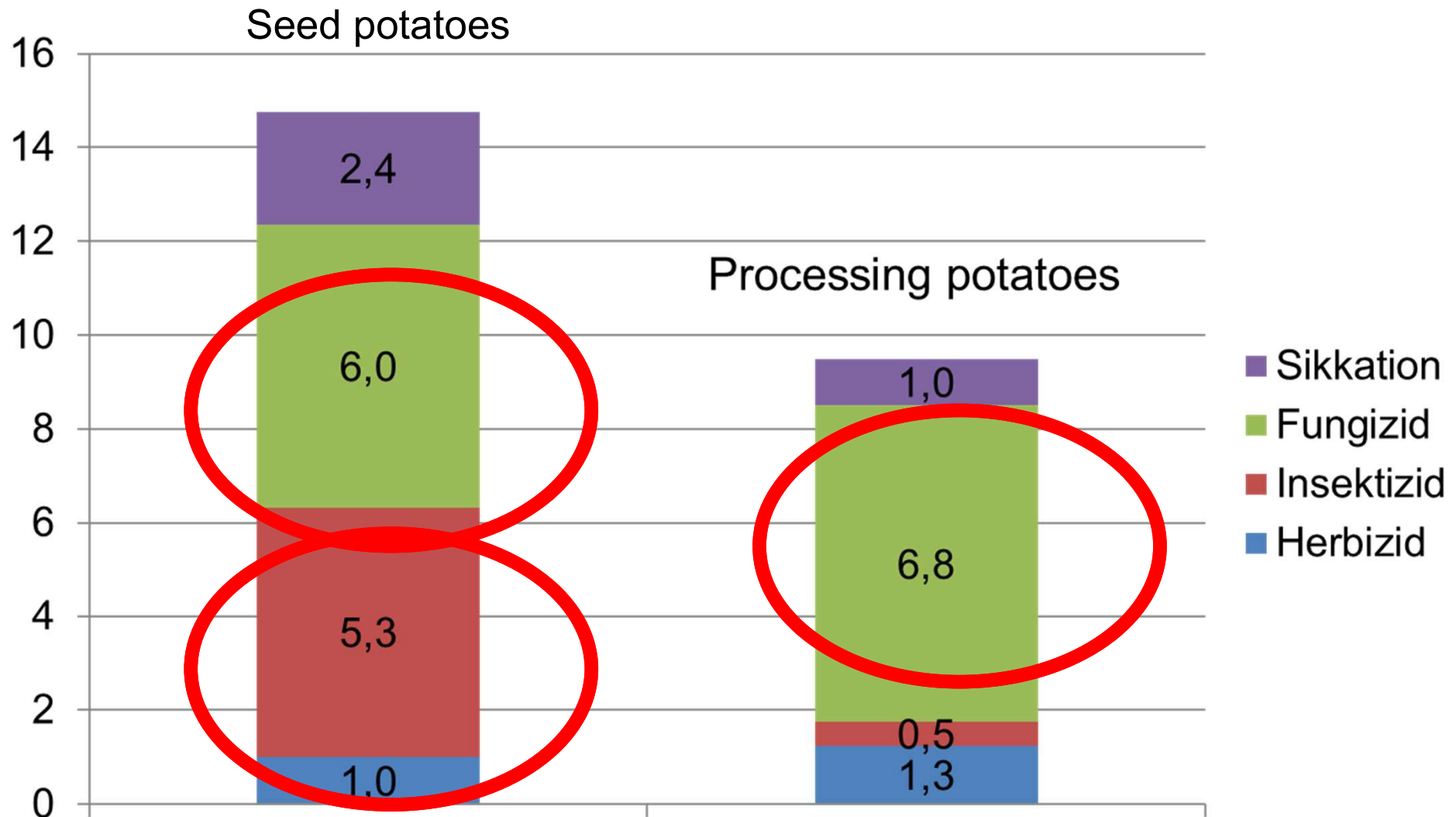
Plant protection in potato farming – A big challenge!



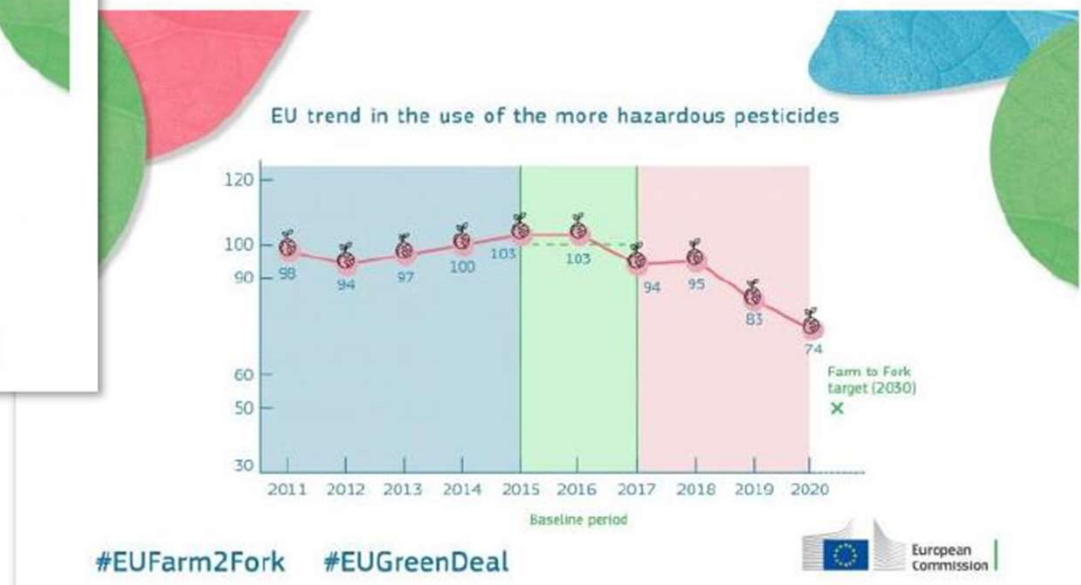
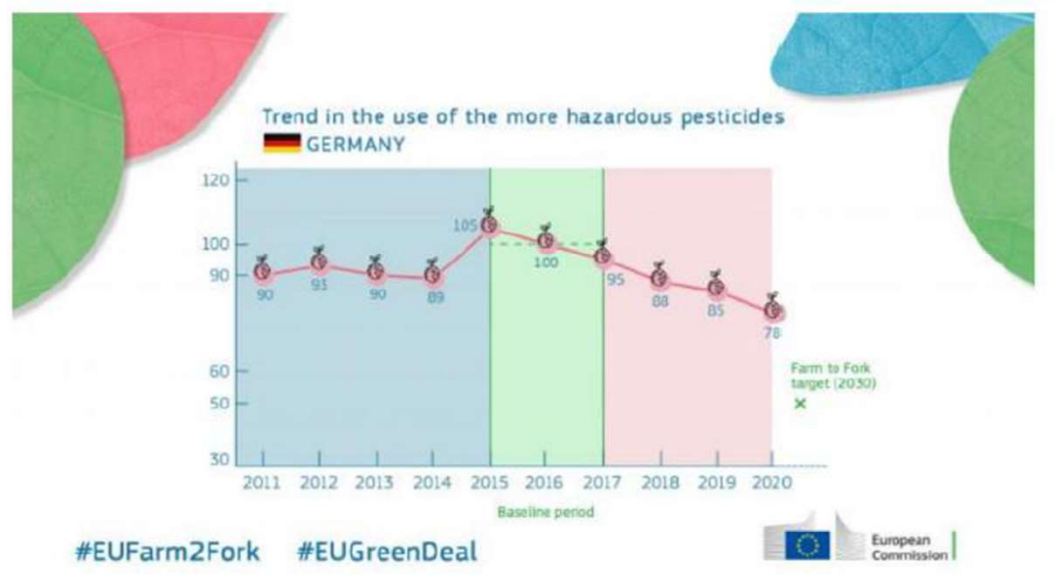
Intensity of plant protection - potatoes

- number of field crossings

Source: Agrar GbR (DE)



Reduction of use and risk of pesticides



Source: DBV/COM

Active substances - candidates for substitution ^{1,2}

Insecticides	Herbicides	Fungicides
bifenthrin	aclonifen	copper compounds
dimethoate	diquat	difenoconazole
esfenvalerate	flufenacet	famoxadone
ethoprophos	glufosinat	fluopicolide
fipronil	metribuzin	metalaxyl
lambda-cyhalothrin	quizalofop-P	
metam		
oxamyl		
pirimicarb		
thiachlopirid		

1: according to Regulation (EU) No 1107/2009, Implementing Regulation (EU) No 540/2011 and Implementing Regulation (EU) No 2015/408

2: black = available for potato farming in Germany

AND: Ban of neonicotinoides clothianidin, imidachlopirid and thiamethoxam from 2018

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Thank you

