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Office of Finnish Agriculture, Forestry and Cooperatives Presidents of the Nordic and Baltic farmers' organisations

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Dear Presidents,

I would like to thank you for the joint letter from the Nordic and Baltic Farmers' organisations on climate change adaptation entitled, "Technology and research are crucial for farmers to produce food, to adapt to changing climate and to provide climate change mitigation results".

In your joint letter, you emphasise the important role of farmers in feeding the world's growing population in a sustainable manner, responding to environmental and consumers' concerns. You stress that, in order to achieve this, farmers should have access to new technological, biotechnical and agronomic solutions that can be effectively implemented through a clear regulatory framework. Furthermore, you call for enhanced sustainability in plant protection as well as sufficient investment in research and innovation to support farmers in adapting to climate change.

You refer, in particular, to the need for legal clarity in using new technologies such as new breeding techniques. The judgement of the Court of Justice of the European Union (CJEU) on mutagenesis¹, published in July last year, has clarified that the EU GMO legislation applies to new mutagenesis techniques. Following the ruling, the Commission has been working with all Member States to ensure that the legislation, as interpreted by the Court, is properly implemented and enforced. My services have also been gathering Member States' views on the consequences of the Court ruling, including its impact at national level. The objective is to help operators ensure that products placed on the market are safe and comply with the legislation.

¹ Case C-528/16, Confédération paysanne and Others, Judgement of 25 July 2018, ECLI:EU:C:2018:583

I have taken note that you consider it urgent to change the legislative framework so that farmers have all the options available in order to face challenges ahead, especially those in the Northern region. There are no plans to present a new legislative proposal on GMO legislation under the current College of Commissioners, which is reaching the end of its mandate.

I am however personally a strong supporter of science-based policy and also believe that agriculture needs more innovation. EU legislation should keep pace with scientific developments. However, experience shows that, on genetic modification, we have to look at more than science. Society has many different views.

I would encourage you therefore to engage constructively in open debates with national regulators, scientists and stakeholders, including consumers, on the potential risks and benefits of new breeding techniques. I remain convinced that concrete examples would be useful to foster public confidence and acceptance of new technologies. Such debates should also cover ethical, legal, societal and economic aspects. I can confirm my commitment to contribute to such debates.

With regard to sustainability in plant protection, I share your view about the need for science-based risk analysis and decisions to support the sustainable and responsible use of plant protection products. Let me recall that in the Union legislative framework on pesticides, the Commission can only approve an active substance after a comprehensive science-based assessment has demonstrated that safe use is possible. During my mandate, I have strongly defended the principle that decisions remain based on the outcome of the assessments conducted by Member State experts and the European Food Safety Authority (EFSA). I have also repeatedly called on Member States to respect the outcome of the scientific assessments for their own decisions on the authorisation of plant protection products.

I have also reminded Member States that, under Directive 2009/128/EC on the sustainable use of pesticides, they may take measures to reduce the use of plant protection products by privileging, in a non-discriminatory manner, certain products or by restricting access to some products for non-professional users.

In 2016, the Council took note of an action plan to increase the availability of low-risk plant protection products and accelerate implementation of integrated pest management in Member States. I presented a progress report on the status of implementation of the various actions in Member States, at the AGRIFISH Council meeting of July 2019. With regard to low-risk plant protection products, I invited

Member States to make serious efforts to meet the shorter deadlines for product authorisations foreseen in Regulation (EC) No 1107/2009.

With regard to integrated pest management, which is one of the key obligations under Directive 2009/128/EC, the progress report outlined that Member States must deploy additional efforts to implement its principles into concrete farming practices for many more crops. Let me also remind you that a similar conclusion was made in the Commission report on the implementation of the Sustainable Use Directive² in 2017 where, in particular, it was highlighted that Member States were not doing enough to reduce the dependency on chemical substances for the purposes of plant protection, and the potential of integrated pest management was not fully exploited.

For its part, the Commission has taken a range of actions, including increasing awareness about integrated pest management through its web-portal³, setting up several training courses and providing support to Member States on the implementation of integrated pest management through meetings of the Expert Group on the Sustainable Use Directive and other events such as workshops.

Concerning research and development of alternative pest control techniques, the EU Framework Research Programme Horizon 2020 has funded more than 40 projects (i.e. more than EUR 200 million) and will continue to focus on non-chemical substitutes to plant protection products or less risky practices.

In the context of the Commission's legislative proposals for the Common Agricultural Policy (CAP) post-2020, there is an explicit commitment to "aim higher" with regard to the environment and climate, supporting the continued transition towards a more sustainable agricultural sector.

Based on nine specific objectives, which reflect the economic, environmental and social pillars of the policy, the future CAP will continue to ensure access to high-quality food and strong support for the European farming model with an increased focus on the environment and climate, supporting the continued transition towards a more sustainable agricultural sector and the development of rural areas. In particular, Member States will be obliged, under the European Agricultural Fund for Rural Development (EAFRD), to spend at least 30% of their budgets on the environment and climate.

At EU level, research and innovation (R&I) funding will be fully mobilized, through Horizon Europe, to support the transition towards sustainable agriculture and food production, from basic research to

² https://ec.europa.eu/food/sites/food/files/plant/docs/pesticides_sup_report-overview_en.pdf

³ https://ec.europa.eu/food/plant/pesticides/sustainable use pesticides en

innovation, technological development, demonstrations and deployment. The Multi-Financial Framework proposal for 2021-2027 devotes some 10 billion euros to R&I in 'food, agriculture, rural development and the bioeconomy', roughly doubling these investments under Horizon 2020.

The European Innovation Partnership "agricultural productivity and sustainability" (EIP-AGRI), implemented by Horizon 2020 and the CAP, aims to foster innovation through the involvement of all key players (farmers, foresters, advisors, cooperatives, industry, etc.), thereby recognizing the systemic nature of the changes needed in our food systems in order to strengthen sustainability.

With a proposed budget of €1.68 billion, the financing of food safety policies under the Single Market Programme (as part of the MFF) includes a specific strand to support sustainable food production and consumption. This programme aims to fund initiatives taken by farmers and other food business operators and civil society stakeholders to optimize resource efficiency in the food supply chain and valorise agri-food residual streams, whilst ensuring food safety and protection of animal health.

To conclude, I would like to reaffirm the Commission's strong commitment to the farming community as well as to the necessary transition to a more sustainable food system. To address societal expectations for a greater ambition of environment protection, we need a global approach which will include health, nutrition, sustainable use of pesticides, food waste prevention and animal welfare aspects. This will require the farmers' active engagement.

