



STELLA KYRIAKIDES
MEMBER OF THE EUROPEAN COMMISSION
HEALTH AND FOOD SAFETY

Rue de la Loi, 200
B-1049 Brussels – Berl 10/380
stella.kyriakides@ec.europa.eu

Brussels, 22 November 2022

Dear Chair,

Thank you for your letter of 6 October 2022 inviting the Commission to complement its impact assessment accompanying the proposal for a Regulation on the sustainable use of plant protection products (SUR).

Let me assure you that the impact of the pandemic on the proposed Regulation has been specifically considered in the impact analysis carried out, as evidence referenced in the Commission impact assessment and supporting external study demonstrates.

I fully agree that the effects of drought and climate change on agricultural production are very important issues. Evidence used in the impact assessment points out that intensification of agriculture has contributed significantly to food availability and affordability in the EU but has also had a range of negative consequences for the health and quality of natural ecosystems.

Partly, this arises from the use of inputs such as pesticides and chemical fertilisers, and partly it is a function of the prevalence of ‘monocultural landscapes’ in which there is less opportunity for nature. In turn, the loss of biodiversity leads to a need to intensify agriculture further. Climate change is already affecting Europe and the most serious climate change-related problems include more extreme droughts, lower effective rainfall and higher temperatures that risk increasing forest fires and resulting in further ecosystem degradation.

The effects of climate change on ecosystems are wide ranging and are considered one of the key risk factors for biodiversity decline and are projected to increase significantly across all ecosystems. The study conducted to support the impact assessment concludes that damaging periods of summer drought are likely to become more frequent, especially in southern European countries, and drier soil conditions will reduce growth of crops, pasture and trees (agriculture and forestry).

Norbert Lins
Chair of Agriculture and Rural Development Committee
norbert.lins@ep.europa.eu

Concerning developing economic factors, food price inflation currently exceeds and drives up general inflation. Price volatility is projected to increase owing to the increasing global demand for food driven by population growth, the growing economic prosperity of developing economies and changes in dietary shifts away from grains to meats and other calorie-rich foods. Increasing demand for biofuels, the slowdown in productivity growth in agriculture, poor harvests in some major producing countries caused by climate change and shock events; increasing input cost (e.g. fertilisers, plant protection products) and their link with price trends in other commodities such as energy will also play a role.

Russia's war against Ukraine and the most recent economic developments influencing also inflation have indeed exacerbated food security concerns. The Commission has taken, and it continues to take, actions on food security and as announced on 22 June 2022, the Commission is performing a specific analysis on the key drivers of food security, which will be presented shortly.

I should also like to underline that the SUR proposal is not an isolated measure. As set out in the Farm to Fork Strategy, the Commission has adopted rules to speed up approval of biological active substances for pesticides, is scheduled to adopt a proposal on New Genomic Techniques in the EU next year, and also finances research and innovation on crop protection through its Horizon research programme.

At the AGRIFISH Council of 26 September I made clear that we fully acknowledge the concerns which the SUR legislative proposal has generated. This is particularly true for aspects such as the potential prohibition of all pesticide use in sensitive areas (with some derogations), the ambition of 50% pesticide use and risk reduction targets to be achieved by 2030 and potential additional administrative burden for farmers, other professional pesticide users and competent authorities. As we have discussed on previous occasions as well, I emphasised in my comments to Ministers that we are open to workable solutions on these issues.

Regarding other aspects, I can reassure you that the outcome of the additional analytical work which is being carried out on the key drivers affecting food security could also provide valuable input for future discussions.

I look forward to discussing the SUR proposal and your Members' important comments and concerns at an upcoming meeting of the Committee.

Yours sincerely,



cc. Mr. Pascal Canfin, Chair of the ENVI Committee