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To: Commissioner S. Kyriakides
European Commission
Rue de la Loi 200
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Concerns: The Farm to Fork Strategy's objectives on pesticides reduction cannot be achieved without a strong implementation of the substitution principle.

Dear Commissioner Kyriakides,

In 2019, the European and Mediterranean Plant Protection Organization (EPPO) adopted a revised version of its standard PP 1/271 (3) Guidance on efficacy aspects of comparative assessment. As your DG is currently assessing options for "*improving the effectiveness of comparative assessments of products containing candidates for substitution*" (3rd recommendation of the REFIT report), we urge you to exclude any incorporation of this new guidance in the PPPs guidance's umbrella. It not only undermines the core principle of substitution laid down in the PPPs Regulation, but also nips in the bud the 50% reduction target for the more hazardous pesticides by 2030 set in the Farm to Fork Strategy. Your commission claims to fulfill this objective "*mainly*" by having the candidates for substitution withdrawn from the market, but this can only be achieved if it stops obediently relying on EPPO standards.

1. A deviant and non-compliant interpretation of the EU provisions set out in article 50 and annex II of the PPPs Regulation 1107/2009.

In various aspects, this new guidance is an extremely biased interpretation of article 50 and Annex IV, which makes substitution almost impossible in practice. For this reason, it fails to meet the public health and environmental protection requirements of the PPPs Regulation. Please, consider the following example. The last sentence of Annex IV of the PPPs regulation states that "*the comparative assessment shall take authorized minor uses into consideration*". In accordance with the legislative text, this is therefore a parameter that must be integrated by Member States like many others into the comparative assessment, but it cannot in itself constitute a sufficient reason to renounce the substitution. However, EPPO standard PP 1/271 (3) has made minor uses the first criterion of its "*decision scheme*" (stage A). If minor uses exist and are deemed "*sufficient*", the comparative assessment procedure must stop, even if the existence of alternatives has not been assessed yet. Minor uses are a matter of exceptional or minor situation, but the EPPO makes the exception the norm. What are the chances of a substitution taking place under such conditions?

For the sake of brevity, we will limit ourselves to this point here, but we would be happy to also discuss other topics of concerns, such as the misuse of the mode of action concept to evaluate resistance to pest and disease (stage B), already adopted as stage 1 in the previous version of EPPO guidance (PP1/271 (2)).

The completely biased nature of this guidance is not unrelated to its development and adoption process, where some stakeholders have had a much better chance to be heard than others.

2. A non-inclusive, or rather unbalanced, revision process of EPPO Standard

This last version of the EPPO standard PP 1/271 (3) was reviewed building on the conclusions of a EPPO workshop organised on 24-25 October 2018. Out of the 72 participants to this workshop, 44 delegates represented crop protection companies and consultancy firms vs. 25 for national regulatory authorities (please see by yourself in the joined document). It goes without saying that PAN Europe was never invited, and we really doubt any other NGOs was. Such an unbalanced representation of stakeholders is unacceptable and could only lead to the adoption of a guidance favorable to those industries, that falsely claim to speak for the general interest of farmers. An organization (EPPPO) that so openly favors industry at the expense of civil society, regardless of its international and intergovernmental nature, cannot continue to provide the European PPPs regulation with such flawed guidance. At least not if the EU intends to lead by example on the international scene and to live up to its commitments under the PPPs Regulation, the new Transparency Regulation and the Green Deal. No obligation to harmonise prevents the EU from going further than the EPPO.

3. For a shift away from EPPO status quo friendly standards, towards an approach that supports pioneers

Hence, it is time the EU distances itself from the EPPO's so-called expertise and pushes for a more balanced participation of all stakeholders, including in the EU framework. As representatives of the citizens, it is scandalous that we need to make so many efforts to get information and be heard. We call for your DG to take a strong stand on this long-standing issue.

Furthermore, as we were not given the opportunity to present our own recommendation at this EPPO workshop, let us present it here. We call for a strategy that incentivizes frontrunners by making them the benchmark. When 10% of the EU farmers apply (non-chemical) alternatives in a particular crop, it should be taken as the standard for all farmers. For this, we recommend the Commission makes use of its delegation of power to amend Annex IV and draw up EU rules, per crop, making all (non-chemical) practices and methods used by >10% of the farmers compulsory.

Dear Commissioner, candidates for substitution are the most hazardous and toxic substances for human health that we can find in the EU. All of them combine (among others) endocrine disrupting, carcinogen, toxic for reproduction, neurotoxic or immunotoxic properties. We urge you to take up this issue and act for the health of European citizens. It is high time to turn the EU's ambitions into action.

From beforehand, thank you for your answer.

Best regards,

Salomé Roynel

PAN Europe