Position Paper – Commission debate on Crop Protection (14/05/24)

In the modern agricultural sector, crop protection plays a crucial role in achieving a good harvest and keeping food prices low. We, producers of crop protection products, work closely with customers and stakeholders to make agriculture more sustainable, advising growers to apply crop protection only where and when necessary, and in the most sustainable way possible. This transition to a more sustainable agriculture requires a context-specific approach. As involved parties, we therefore share some considerations for the responsible application of crop protection products.

Authorization of glyphosate

In November 2023, the European Commission extended the approval of glyphosate by 10 years. To this end, the approval authorities of 4 European member states, including the Ctgb from the Netherlands, collaborated to evaluate the approval dossier and prepare a draft Renewal Report which was then peer reviewed by EFSA experts. The extension is based on a scientific dossier consisting of both new studies and previous studies, covering a wide range of applications, as well as environmental and societal considerations.

Extensive research over half a century has established that glyphosate, when used as directed, poses no harmful effect on human and animal health and no unacceptable effects on the environment.

According to EFSA, "i*t is the most comprehensive and transparent assessment of a pesticide that EFSA and the EU Member States have ever carried out, taking into account thousands of studies related to human and animal health and the environment, and involving dozens of scientists from EFSA and national authorities across Europe."*

Integrated crop protection

Glyphosate plays an important role as part of integrated crop protection for weed management. When used as a part of a no-till toolbox, it helps with preserving soil structure and reducing greenhouse gas emissions. Farming businesses and producers invest in responsible and sustainable use, supported by tools such as LTO's decision tree for weed control (see annex). This allows the grower to determine which form of weed control is best applied at different times in each situation. Glyphosate has several advantages over mechanical alternatives:

- The application of glyphosate allows for no-tillage farming practices and thus, **soil structure is preserved**, preventing greenhouse gas emissions and soil compaction. Good soil structure promotes soil aeration and drainage, which is beneficial for crop root development. Additionally, around 70% of wild bees nest in the soil. By not disturbing the soil, the nests remain intact. Mechanical weed removal leads to the decomposition of soil organic matter, releasing CO_2. Furthermore, mechanical alternatives are associated with increased (fossil) fuel consumption and thus CO_2 emissions.
- It leads to **lower costs and improved labor efficiency** for the farmer, especially in times of labor shortages. Crop protection is less intensive and costs less for the same crop yield. Moreover, mechanical alternatives are not possible on wet soil, which can lead to delayed soil cultivation and reduced harvests.
- **The use of precision technology** allows for even more responsible and effective application of crop protection products. This technology can drastically reduce the use of crop protection products. Alternatives, such as lasers and mini hoes, are less efficient and have disadvantages compared to precision technology based on glyphosate with spot applications.

Level playing field

It is also important for farmers in the Netherlands to have a level playing field with farmers in other European countries and beyond.
If, the Dutch farmers were to lose this tool in their toolbox, this would lead to a competitive disadvantage for them since the alternatives are not cost efficient or effective. This would lead to increased inputs for Dutch farms, thereby raising prices of the Dutch commodities against a very competitive global market.

Therefore, we call for:

- *Making decisions on the market approval of crop protection based on scientific data and advice and, in particular, the conclusions of the competent regulatory authorities.*
- *Respecting European approval and allowing agricultural businesses to have a well-stocked toolbox, of which crop protection products are an essential part. National restrictions reduce the toolbox and jeopardize a level playing field among European farmers.*

In conclusion

We trust science and the results of our programs to produce safe and safe, healthy, and affordable food. Of course, we are aware of concerns regarding the use of crop protection products. Therefore, we are willing to engage in dialogue with stakeholders to explain our position.