

The EU Food and Feed Omnibus could complicate things

Reduction in the use of pesticide goals – boon or burden?

By Paula Bester and Paul Hardman

Fingered for their largely unrealistic nature, the reduction in the use of pesticide goals under the Farm to Fork strategy (as part of the European Green Deal) sparked EU farmer frustration and protests.

With an increasing military defence budget and the rise in agricultural input costs, EU farmers are under increasing pressure. After withdrawing the Sustainable Use of Pesticide Regulation under the Farm to Fork Strategy, a strategic dialogue on the future of agriculture in Europe shifted the aim to fostering EU grower competitiveness and resilience, and to make farming attractive again in Europe. Hence, the rise of the EU Food and Feed Omnibus.

The proposals under the omnibus are largely aimed at reducing red tape to strengthen the single market concept and to create more predictability for businesses and investors. However, there are threats for third-country growers exporting agricultural goods into Europe – notably under Reg (EC) 396/2005 governing the setting of maximum residue limits (MRLs) in the EU.

These proposals include the lowering of the MRLs (import tolerances) of active substances no longer approved for use in the EU (due to meeting hazard cut-off criteria) to practically zero. Bear in mind, the EU took a stance to include certain human health and environmental hazard cut-off criteria into their legislation (Reg. 1107/2009), which is not implemented in other countries in the world. Risk-based approaches are usually applied. Although not officially proposed in the Omnibus, there is a real risk of policy makers pushing



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for the lowering of MRLs for all actives no longer authorised in the EU. This is so, even if there are no apparent human health or environmental hazard classification, but the molecule is purely no longer supported by the applicant (registration holder). In short, if EU growers no longer have access to the active ingredient, it's seen by the EU farmers as unfair competition if third-country growers exporting to the EU still do.

Of course, this principle undermines good agricultural practices (G.A.P.) in third countries and their ability to manage pests and diseases of economic importance, and

those that are regulated or of phytosanitary significance. To state the obvious problem, there would be no need for authorisation of some active substances in the EU when the pest or disease does not occur there. The proposed approach disregards independent, scientific, consumer risk assessments to set MRLs on foodstuffs. This is a dangerous development for agriculture and trade. The plant protection toolbox of EU and non-EU growers is shrinking and the food demand is ever increasing.

The Citrus Growers Association (CGA) of Southern Africa is engaging with relevant stakeholders inside and outside the EU, and making relevant inputs into the policy-making process to ensure reasonable rules are finally adopted. 

This development poses a threat for agriculture and trade, and the shrinking plant protection toolbox of EU and non-EU growers.



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