



Ms. Mariann Fisher Boel  
 Commissioner of Agriculture and Rural Development  
 European Commission  
 Rue de la Loi 200, B-1049 Brussels

Brussels, 20 November 2008

**Re: 2<sup>nd</sup> reading on Revision of Directive 91/414/EEC concerning the placing of plant protection products on the market**

Dear Commissioner Fisher Boel,

Our associations, AREFLH<sup>1</sup>, FRESHFEL<sup>2</sup> and OEITFL<sup>3</sup>, representing the **European fruit and vegetables sector** are writing to you with regard to the final negotiations on the future EU pesticide legislation.

We fully acknowledge the need for updating EU pesticide legislation, to provide for a continued high level of consumer protection. Therefore we support the Council common position which provides appropriate health and environmental protection, and which already constitutes a challenge for our sector.

The fruit and vegetables sector is at the forefront in taking up integrated production methods and reducing chemical inputs, yet a sufficient wide range of plant protection solutions remains crucial to ensure the success of these techniques. The ongoing review process in the framework of the current legislation (since 1991) has brought down the total number of authorised active substances from + 1000 to 450 by the end of this year, confronting our sector with over 40 different crops already with **several gaps in plant protection solutions**.

Farmers' options for protecting these crops are further restricted due to limited investment by crop protection manufacturers, given that potential sales generate very slow pay-back on their investments in research, development and particularly authorisation for use. Whilst fruit and vegetables are regarded as high value crops with a total production value of 50 billion EURO (17% of the value of EU's agricultural production), they are generally considered as minor crops due to their wide diversity in species and their relatively small production areas (3% of the cultivated area).

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<sup>1</sup> AREFLH is the assembly of fruit, vegetable and horticulture producing European Regions. It unites 28 regions : SPAIN: Andalucia, Aragon, Cataluña, Extremadura, Murcia, Navarra, Valencia. FRANCE : Aquitaine, Basse-Normandie, Bretagne, Centre, Ile-de-France, Languedoc-Roussillon, Limousin, Midi-Pyrénées, Pays de la Loire, Provence-Alpes-Côte d'Azur, Rhône-Alpes. ITALY : Basilicate, Bolzano, Emilia-Romagna, Lombardia, Piemonte, Toscana, Trento, Veneto. PORTUGAL : Lisboa e Vale do Tejo. BELGIUM : Flandres.

<sup>2</sup> Freshfel Europe is the European Fresh Produce Association, representing the interests of operators across the supply chain of fresh fruits and vegetables in Europe and beyond. Freshfel Europe currently has over 200 members, including both companies and associations.

<sup>3</sup> OEITFL represents the fruit and vegetable processing industry. Over 500 companies affiliated via our member associations producing more than 6 million tonnes of processed fruit and vegetables each year (approximately 650.000 t of fruit preserves, 1.200.000 t of canned fruit, 2.300.000 t of canned vegetables, 2.500.000 t of frozen vegetables and 35.000 t of dried vegetables).

The situation is likely to worsen as the full impact of the review process still has to come about and an initial analysis of the impact of the future regulation has shown some key plant protection solutions for the horticulture sector will be lost over the coming years, leaving growers with no solutions to control certain pests. Nevertheless, present market and regulatory standards require fruit and vegetables to be “sound, fair and of marketable quality”; thus exempt of any traces of pests.

In this light we'd like to draw your attention to an amendment adopted by the European Parliament's Environment Committee, regarding the **establishment of a promotion fund for minor uses**. Such a fund would finance the necessary studies (residue trials, etc) in order to support the authorisation of plant protection solutions for minor crops. The publicly funded IR-4 project in the USA provides first hand experience how such a fund could **introduce safer and more efficient pesticides for fruit and vegetable production** and other specialty crops (<http://ir4.rutgers.edu/>).

Whilst some initiatives to increase the availability of plant protection solutions for minor uses exist at Member State and EU-level, these efforts remain modest and scarce compared to the magnitude of the problem for the EU horticulture sector. Furthermore the provisions of the future EU authorisation rules (enhanced mutual recognition of authorisations, comparative assessments for candidates for substitution, etc) indicate the increased relevance of an EU coordinated approach in this matter.

As the goals of such a promotion fund coincide with the basic objectives of the CMO fruit and vegetables (e.g. objectives producer organisations, operational programmes), our sector is seeking **your support as Commissioner for Agriculture for a firm commitment on behalf of the Commission to come forward with a proposal for a Promotion fund for minor uses as soon as possible** based on an impact assessment of the benefits, practicability and administrative costs involved.

We would like to thank you in advance for your consideration of our concerns on this important issue for the EU fruit and vegetable sector.

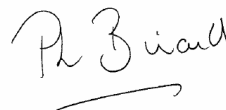
Yours sincerely,



Susanne Meyer  
OEITFL



Jacques Dasque  
AREFLH

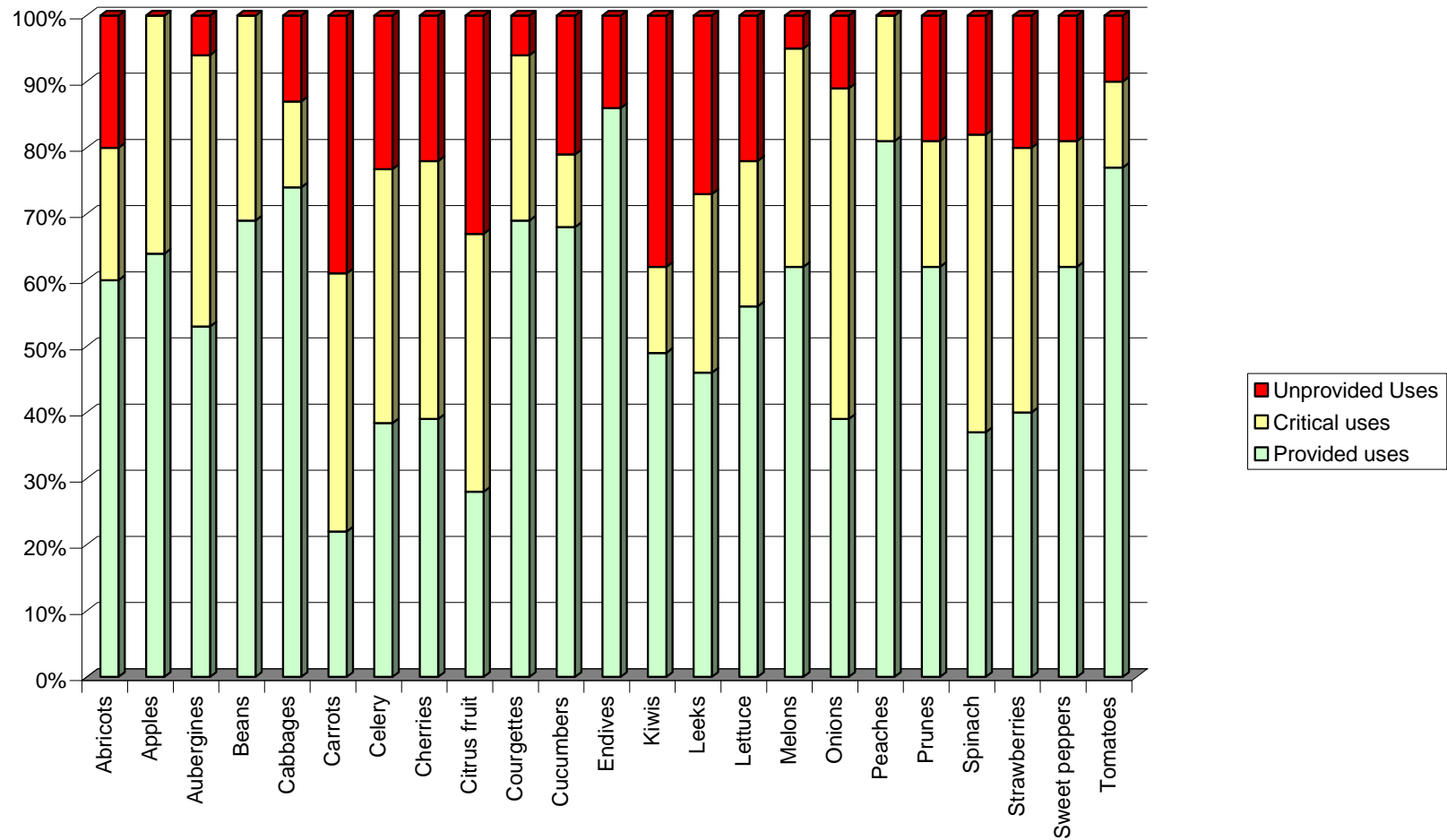


Philippe Binard  
Freshfel

Cc : Ms. Naeseger, Mr. Mousnier, Mr. Demarty, Mr. Hoelgaard, Mr. Mildon, Mr. Garcia-Azcarate, Mr. Mittermayer, Mr. Cappellaro

Enclosed: Example of state of play for minor uses in France (Source: CTIFL)

Present situation Fruit & Vegetable minor uses in France (Source CTIFL)



Use = 1 commodity x 1 pest x 1 application mode

Unprovided use = no authorised plant protection solutions exist for a given pest-commodity combination

Critical use = critical amount (1-2) of plant protection solutions are in place for a given pest-commodity combination (risks for resistance)

Provided use = sufficient plant protection solutions are in place for a given pest-commodity combination