



Agriculture and Agri-Food Canada
Market Access Secretariat
1341 Baseline Road Tower 5
Ottawa, Ontario K1A 0C5
Canada

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Submitted Via Consultation Portal

To Whom It May Concern:

RE: Roadmap and Inception Impact Assessment for EU rules on the sustainable use of pesticides

On behalf of the Canadian Produce Marketing Association, we are pleased to provide comments to the Market Access Secretariat (MAS) to inform Canada's position for the European Commission consultation on the combined Roadmap and Inception Impact Assessment for the proposed EU rules on the sustainable use of pesticides.

About CPMA

Based in Ottawa, the Canadian Produce Marketing Association (CPMA) is a not-for-profit organization representing companies active in the marketing of fresh fruit and vegetables in Canada, from the farm gate to the dinner plate spanning the entire produce industry. The Association's members include major growers, shippers, packers, and marketers; importers and exporters; transportation and logistics firms; brokers, distributors, and wholesalers, retailers, and foodservice distributors; and fresh cut operators and processors. Founded in 1925, CPMA is today proud to represent over 800 domestic and international members who are responsible for 90% of fresh fruit and vegetable sales in Canada.

Comments

Promoting international trade and investment with export markets is a priority for the Canadian fresh produce sector, and Canada plays a vital role in supporting the consumption of fresh fruits and vegetables amongst the European population. In fact, European Union member countries are among the top ten Canadian export markets for both fruit and vegetables. CPMA therefore welcomes the opportunity to provide comments in order to inform Canada's position for the European Commission consultation on the combined Roadmap and Inception Impact Assessment for the proposed EU rules on the sustainable use of pesticides.

To begin, CPMA would like to reiterate the vital role that crop protection tools play in protecting our food and crops from invading weeds, insects, and disease. Particularly as we mark the UN International Year of Fruits and Vegetables in 2021, it is imperative that we recognize the essential contribution of crop protection tools to the fresh fruit and vegetable sector, one of the most global supply chains in the world. We acknowledge that pesticides must be used within the guidelines of good agricultural practices, which consider the needs of environmental quality and human health, as well as agricultural stability and effective pest management.

In Canada, the pesticide approval process used is one of the toughest in the world and meets or exceeds the health standards established by the World Health Organization. Given the SUD's focus on Integrated Pest Management (IPM), it is also important to note that for many years, crop protection in Canada has included the widespread adoption of IPM on fruit and vegetable farms. It should also be noted that the agricultural sector is on the front lines when it comes to facing the challenges of a changing climate and environmental sustainability. Indeed, farmers and others along the supply chain have led the way in adopting environmentally sustainable practices. Constant monitoring of crops supports decision making, including plant protection products (PPP) use. Pesticides are not liberally applied; instead, application is guided by sophisticated data sets to maximize output and support sustainability of the land that farmers steward.

CPMA emphasizes that phytosanitary requirements that are not science-based or essential to security act as effective non-tariff trade barriers between countries and must be eliminated. Any changes to the SUD must therefore ensure that any resulting phytosanitary requirements for fruit and vegetable imports be based on sound science and an appropriate risk-based approach. At the same time, regulatory agencies responsible for regulation and evaluation of pest control products must have sufficient resources to conduct thorough scientific reviews and to make science and data-based conclusions. Without the necessary resources, decisions can be made that are detrimental to growers and the European economy.

Moving forward, the ability of the European and Canadian fresh fruit and vegetable industry to access a new import or export market is dependent upon the recognition of trading partners' plant protection systems. In addition, the harmonization of Maximum Residue Limits (MRLs) should be a goal to remove barriers to the movement of fresh produce, not just between North America and the EU but across the globe. Harmonization of MRLs would boost trade for European and Canadian producers and support safe produce choices for consumers in both markets. International standardization between government bodies is also critical to the success of the fresh produce sector, which is one of the most global supply chains in the world. It is important to mention that consumer confidence in the safety of the food supply is eroded when jurisdictions have different regulations. Consistent, evidence based MRLs will boost trade for producers while also allowing a variety of healthy, safe fresh produce choices to continue to be available to consumers around the world.

Lastly, it is also important to consider the EU's own findings that there has been a significant increase in the number of emergency authorizations. Moving forward, the EU must continue to consider allowances for product use for a wide range of reasons, such as when no alternative is available to deal with emerging plant health issues minor uses and to mitigate food security risk. Under its current form, the emergency authorization process for plant protection products under regulation (EC) No 1107/2009 is difficult to use. Rather than see these emergency authorizations as failures on the part of Member States to fully implement both the SUD and Regulation (EC) No 1107/2009, it is prudent to consider that a rapid change in PPPs availability will only continue to exacerbate this concern; instead, there is an opportunity for the Commission to work more closely with producers to set targets that reflect the realities of threats to crops and the capacity to produce food. Challenges in the efforts towards the sustainable use of pesticides and increased IPM implementation should not be confused with a lack of will of food producers to embrace these efforts but rather should be part of a thoughtful integration of these efforts in today's production of fresh fruits and vegetables.

CPMA would like to thank the MAS for the opportunity to submit comments in order to inform the Canadian position on the combined Roadmap and Inception Impact Assessment for the proposed EU rules on the sustainable use of pesticides. We appreciate you taking the time to review our comments.

Sincerely,



Ron Lemaire
President
Canadian Produce Marketing Association