

# A loud lobby for a silent spring

The pesticide industry's toxic lobbying tactics against Farm to Fork

 • BASF

**Pesticide  
industry  
lobby**



**EU Farm  
to Fork**

pesticide  
reduction  
target



**syngenta**



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# 1 INTRODUCTION

When scientist Rachel Carson published *Silent Spring* in 1962, which brought to the world's attention the harms that pesticides such as DDT were wreaking on ecosystems, her warnings were met with fierce criticism and resistance by the pesticides industry. Chemical giants like Monsanto *predicted* her recommendations would bring about a world of famine and disease. Sixty years later, as the European Union's long-awaited proposal to vastly reduce the use of pesticides is about to be published, Corporate Europe Observatory uncovers the latest tactics of the pesticides industry in its lobbying campaign to undermine such targets.

On 23 March 2022 the European Commission will release the details of their proposal for how the EU should cut down its dependence on pesticides by at least 50 per cent by 2030. This is one of four key reduction targets set by the Commission in its Farm to Fork and Biodiversity strategies, key elements of the EU Green Deal published in May 2020. These also include a target to increase organic production to 25 per cent by 2030, an important pathway to achieve pesticide reduction.

The promised Farm to Fork target is of 50 per cent reduction in risk (by replacing the most toxic pesticides for less harmful ones) and use of pesticides. Since 2009 the EU has implemented the Sustainable Use of Pesticides directive (SUD, see Box 1), dedicated to making the use of pesticides "sustainable": as a principle, synthetic pesticides should only be used "as a last resort". In practice however, EU countries and institutions have miserably failed to implement this policy. The European Environment Agency *concluded in 2018* that the available data of pesticide sales "does not point to a Europe wide shift towards pesticide use reducing environmental and human exposure to these chemicals". The SUD is now being revised, and will incorporate the long-expected Farm to Fork reduction target.

Pesticides are a *major cause* of the dramatic biodiversity decline, an ecological disaster that is in a far more advanced stage than the climate crisis, putting in peril "the integrity of living systems" that humans also depend upon, according to the Stockholm Resilience Center's delineation of *nine planetary boundaries* and species are going extinct *1000 times faster* than in the pre-human age.

A *recent study* by Le Basic concluded that the costs related to the impacts of the use of pesticides in Europe on human health, water quality, soil, and finally on food production – costs that have to be borne by society through public spending – are much higher than the net profits made by the pesticide sector itself. The report concludes that the current agricultural model has largely benefited the agribusiness and food companies, while farmers are losing out with world market prices for their goods being unstable.

Growing public concern over these issues has resulted in the recent EU citizens' initiative, 'Save Bees and Farmers', backed by 250 organisations, an official petition that has successfully secured the support of 1.2 million European citizens. The demands of ECIs with over one million signatures must be officially taken into consideration by EU institutions. And the ECI demands a much higher level of ambition than is currently on the table: an 80 per cent reduction of pesticides by 2030, a complete phase-out by 2035, and financial support for farmers to make the transition towards toxic-free practices.

As expected, all of this has put the pesticide industry into survival mode and provoked a counter-lobby of huge proportions on the part of the pesticide giants including Bayer-Monsanto, BASF, Syngenta (now Chinese state-owned), and Corteva (Dow-Dupont). Global pesticide sales have doubled in the last 20 years, and following a series of mega-mergers, these four corporations now hold roughly *two thirds of that market* worth nearly € 53 billion.

This report exposes key lobbying tactics used by the pesticide industry to undermine and derail the EU's Farm to Fork targets. These tactics range from scaremongering with 'impact studies', mobilising third countries (notably the US) to put pressure on the EU, to distracting decision makers with voluntary commitments or other false solutions. While fighting reduction targets tooth and nail, corporations like Bayer also lobby heavily for the *deregulation of GM seeds* from new techniques like CRISPR-Cas and push digital tools for farmers. This is part of their new business model, to make up for or in addition to pesticide sales.

Even the horrifying Russian invasion in Ukraine has been *taken as an opportunity by FNSEA*, the French big farm lobby, as an excuse to call for the EU Farm to Fork Strategy to be reconsidered, calling it a “degrowth strategy”, as well as other environmental measures of the EU farm policy CAP. This call was echoed by *Copa-Cogeca*, the conservative *EPP group* and the leadership of the agriculture committee in the European Parliament<sup>1</sup>. Green groups and progressive farm unions *on the other hand* said that the war on Ukraine showed that EU agriculture’s dependence on fossil fuels and fertilizers (both major Russian exports) is a major weakness that can be addressed by the Farm to Fork objectives. They added that “current attempts by some lobby groups to use the war atrocities as an excuse to undermine the Farm to Fork Strategy are fully misplaced.” *Academics wrote to Commissioners* insisting that “tackling the short-term shock must be done with a vision in mind of the larger-scale and longer-term threats of the climate- and biodiversity-crises”.

The industry lobby campaign is well resourced. According to Bayer’s *own 2021 entry* in the EU lobbying transparency register, the corporation spent a whopping €6.5 to €7 million on lobbying the EU institutions. In that year Bayer engaged no less than eight lobby firms, including Rud Pedersen, Fipra, Edelman, and Hume Brophy. BASF, Syngenta, Corteva, and CropLife Europe’s entries were last updated for the year 2020 and the self-declared figures range from €600.000 to €3.2 million. But as Corporate Europe Observatory has reported in the past, *the real figures* may be a lot higher.

The lobbying campaign is being carefully orchestrated at the European and international level by the industry lobby groups CropLife Europe and CropLife International. A leaked presentation of CropLife Europe’s social media strategy 2020–2021, obtained by Corporate Europe Observatory, grants insights into the industry’s real objectives and priorities, and provides additional evidence of their lobbying tactics. This report is furthermore based on hundreds of documents obtained from the European Commission through Freedom of Information requests, personal communication with actors involved, EU consultation submissions, and attending lobby events and ‘stakeholder meetings’ organised by the European Commission.

Our report shows that while the pesticide industry claims to support the EU Green Deal, they:

- paid for partial impact studies to scaremonger about economic losses while painting an unfair picture;
- staged numerous media events and articles, creating an echo chamber around the ‘impact’ studies;
- benefit from a US-led industry–government ‘anti-Farm to Fork’ coalition;
- use third country pressure on the EU to undermine international aspects of the Farm to Fork targets;
- undermine enforcement;
- while opposing mandatory, ambitious targets, at the same time use the discussion on targets as wedge to get unproven new technologies promoted and deregulated (eg digital, drones, new GMOs), including false solutions.

The evidence in this report shows that the EU Farm to Fork targets, a crucial element of the EU Green Deal, is under severe attack from industry. On the other side, over 70 organisations *have warned the European Commission* that the options that are currently on the table, are far from sufficient and would leave too many loopholes. It is of utmost importance that the proposal on pesticides reduction to be made by the European Commission reflects the ECI demands and has a maximum level of ambition, going beyond 50 per cent reduction.



## BOX 01

## Why did the EU's 'Sustainable Use of Pesticides' law fail?

Already in 2009, the EU law on the Sustainable Use of Pesticides (SUD) ([EC/2009/128](#)) seemed to put Europe on a path towards far less dependency on synthetic pesticides. The aim was for European farmers to use synthetic pesticides only as a last resort, when all other means to fight a pest had been exhausted. This was to be achieved through a system called Integrated Pest Management (IPM) [which promotes](#) "sustainable biological, physical and other non-chemical methods" to fight crop pests and diseases, such as longer crop rotation or protecting and enhancing beneficial organisms like insects in fields or greenhouses.

Unfortunately, the implementation of the SUD failed to a large extent. Why? According to a peer-reviewed assessment, the SUD proposed ["no quantifiable means to assess progress and no mandatory targets"](#). Each EU member state was supposed to propose its own targets, measures, and indicators, and establish national action plans, to reduce pesticide use. However, [according to Pesticide Action Network Europe](#) these national plans lacked ambition and failed to define clear targets to reduce pesticide reduction. While all farmers should have applied Integrated Pest Management from 2014, this has never been adequately implemented, resulting in over a decade lost in the quest to reduce damage to biodiversity and human health from pesticide use. Indeed the situation is so deplorable that, as Politico noted in September 2020, Health Commissioner Kyriakides [wrote to 27 EU governments](#) threatening legal action if no immediate action was taken to "ensure immediate and full compliance" with the SUD requirements.

Another cause of the SUD's ineffectiveness is the fact that the EU's Common Agricultural Policy (CAP) with its vast budget of farm subsidies did not get aligned to the SUD. In 2014 the European Court of Auditors criticised the Commission who "explicitly excluded the sustainable use of pesticides and integrated pest management" from the 2014–2020 CAP rules. But in November 2021 another opportunity was missed when EU member states and the European Parliament destroyed attempts by the present Commission to get the 2023–27 CAP aligned to the EU Green Deal and Farm to Fork objectives. Over [3600 scientists called](#) for an overhaul of the CAP. Environmental organisation Birdlife [strongly condemned the CAP deal](#) and said that spending one third of the total EU budget "on an outdated and harmful policy like the CAP" would make it impossible for the European Green Deal to tackle the biodiversity and climate crises.

## 2 LEAKED STRATEGY

### CropLife Europe undermines targets



Since Silent Spring was published the industry has evolved far more subtle, greenwashing strategies. From the outset, the pesticides industry has pretended to embrace the EU Green Deal and Farm to Fork objectives, while in fact opposing binding legislation to achieve them. An [internal powerpoint presentation](#) by pesticide lobby group CropLife Europe (CLE) on its social media strategy, obtained by Corporate Europe Observatory, reveals the pesticide industry's real objectives and priorities.

The "EU Farm to Fork Files" are at the top of CropLife's list, which includes not only the revision of the Sustainable Use of Pesticides Directive, but also the CAP national strategic plans, new rules around pesticide use data, and plans by the Commission to link EU environmental standards to its international trade relations ('green diplomacy'). The CLE social media strategy is said to "promote, bring alive and reinforce the new CropLife Europe narrative". This narrative is centred around the slogan "More With Less" and aims to seduce decision-makers into believing the industry is actually prepared to reduce the role of synthetic pesticides in their portfolio of 'solutions'.

The document states CropLife Europe's overall mission is: "Protect and extend members' freedom to operate – ie to provide farmers with the products and tools to produce More With Less". Despite the positive-sounding "More with Less" slogan, Bayer-Monsanto, BASF, Syngenta, Corteva and their lobby groups do not actually support a mandatory EU-wide pesticide reduction target, according to this presentation. In CropLife Europe's own words, one of their key objectives is: "No uniform, mandatory pesticides reduction targets at the MS [member state] level." Instead, "workable" pesticides reduction targets should be guaranteed "in each MS". CropLife Europe's strategy is to have low-ambition targets at member state level, in combination with weak enforcement. (See sections 8 and 9).

From the industry's submissions to public consultations it is clear that a key tactic is their attempt to undermine effective EU action by demanding that only the risk of certain pesticides, and not the overall quantities used, should be subject to reduction targets. Bayer said for instance that "rather than speaking about reducing volumes we need to focus on reducing the environmental impact".<sup>2</sup> Farm lobby group [Copa-Cogeca echoed this by telling the Commission](#) it should "focus on risk reduction only – and not on volume". Sounds nice, until one remembers that companies like Bayer do not seem to be seriously interested in risk reduction of pesticides. For instance Bayer and Syngenta [sued](#) the European Commission for banning three pollinator-killing insecticides, and they [earn roughly one third of their profits](#) from [Highly Hazardous Pesticides \(HHPs\)](#).

Similarly, the leaked CropLife Europe presentation reveals the group's plan to lobby EU member states for "effective and workable Strategic National Plans".<sup>3</sup> These plans had to be submitted by member states to the Commission by 1 January 2022. A previous [Corporate Europe Observatory report revealed](#) that Bayer [told the Commission](#) that indeed the company participated "in CAP discussions in some Member States". [Copa-Cogeca too has argued that](#) when setting their CAP strategic plans, member states must start "consultations with the representatives of the industries, distributors and users, directly concerned with these measures".[3] As stated above, the CAP strategic plans are crucial to achieving the EU Farm to Fork objectives. However, [a benchmarking exercise](#) by Birdlife and the European Environmental Bureau (EEB), published in February 2022, showed that 18 out of 23 plans assessed scored only poor, or very poor in terms of environmental and climate objectives.

[The CropLife leaked document](#) provides further evidence of its lobbying against the EU Farm to Fork Strategy, from scaremongering with 'impact studies', to mobilising third countries to put pressure on Europe. We examine these tactics one by one in much more detail below, quoting from the leak and from the dozens of documents obtained from the European Commission or other sources. At a general level, this material gives us a look behind the greenwashing slogans, and into how the industry as a whole actually approaches pesticides reduction policies in Europe.

<sup>2</sup> Bayer, Our views on Sustainable Use of Pesticides Directive in zip folder of annexed docs replying to SUD public consultation

<sup>3</sup> Indeed already back in July 2020 Bayer confirmed to EU Commissioner for Agriculture Wojciechowski that it was lobbying on these plans in "some Member States".

### 3 TACTIC A

## Scaremongering with industry-funded impact studies



Since Silent Spring was published the industry has evolved far more subtle, greenwashing strategies. From the outset, the pesticides industry has pretended to embrace the EU Green Deal and Farm to Fork objectives, while in fact opposing any binding legislation to achieve them. An [internal powerpoint presentation](#) by pesticide lobby group CropLife Europe (CLE) on its social media strategy, obtained by Corporate Europe Observatory, reveals the pesticide industry's real objectives and priorities.

Scaremongering with alleged economic impacts from green policies is a tried-and-tested lobbying tactic (see examples in previous Corporate Europe Observatory reports [here](#) and [here](#)). Impact assessments often over-emphasise negative economic impacts – which are, needless to say, far easier to measure than health or environmental benefits – and that often exclude the costs (eg to public health systems, to lack of pollinators in agriculture, to polluted waterways) of not acting.

Building on a previous Corporate Europe Observatory [report](#), new documents obtained show that following the EU Farm to Fork launch in May 2020, the pesticide lobby and its allies flooded the European Commission with calls for “[cumulative](#)” impact assessments of the Farm to Fork Strategy, the Biodiversity Strategy and other Green Deal initiatives together, so that what they call “[realistic](#)”, “[practical](#)”, “[scientific-based and market oriented](#)” goals could be set.<sup>4</sup>

In the meantime, the lobby groups set up and funded five ‘impact studies’ of their own, as ammunition to undermine the EU Farm to Fork Strategy, with a sixth coming from the US Department of Agriculture (USDA). Three of these studies were paid for by industry but carried out by universities: two by Wageningen Economic Research, and one by Kiel university.

Scaring Members of European Parliament with the conclusions of those studies, was the key lobby tactic deployed ahead of an important EU Parliament vote on the Farm to Fork Strategy in October 2021. Copa-Cogeca kicked off in September 2021 with a press release titled “How many more studies on the impact of the Farm to Fork Strategy are needed before a real debate starts in Brussels?”. They [stated that](#) as “an official study is still missing”, this had “pushed various universities and stakeholders” to assess potential impacts, adding that they “cannot accept a counterproductive target-oriented approach of Farm to Fork”. However, the universities were not “pushed”, they were paid to do these ‘studies’.

One week before two of these ‘studies’ were launched, [Euractiv raked up an older story](#) claiming that the Commission had kept a report by its own research service on the impacts of the Farm to Fork hidden under the carpet for months. This, the article said, lent support to “rumours that the Commission’s decision to publish the report without fanfare in the midst of summer was a political one”.

The [report](#) in question was delivered by the Commission’s Joint Research Centre (JRC) and was published in August 2021. The report clearly states that it is not an impact assessment and that it does not include other envisaged measures (to reduce food waste or to change diets) that would alter the outcomes. The JRC [study found](#) that the Farm to Fork targets would achieve “significant environmental benefits”, but also pointed at a potential “decline in EU production and variations in prices and income for selected agricultural products” (see Annex 2 for more details).

The Commission [explained](#) that it had wished to address a number of shortcomings in the report, but that once it was concluded this would take too much time the study was published “without further delay”. However, seeing the opportunity to make a scandal out of this supposed ‘cover-up’, farm lobby group [Copa-Cogeca jumped](#) on [Euractiv’s](#) “evidence of the deliberate delay” and dismissed the Commission’s justification as “far from convincing”.

<sup>4</sup> Sec Gen 2021/3571, 24c Power Points: Cogeca Presidency Business forum on “Agri-food and forestry cooperatives heading towards climate neutrality” – annex Ares(2020)5094912



### 3. SIX IMPACT STUDIES REPRODUCING LOBBY MESSAGES ON COMMAND

No less than six different ‘impact studies’ were paid for and launched by CropLife Europe, European Livestock Voice and Copa-Cogeca, the seed sector lobby EUROSEEDS, grain traders lobby group COCERAL, German agribusiness alliance the Grain Club, as well as major agri-industry ally, the US Department of Agriculture (USDA). Details of each of these ‘impact studies’ are listed in Annex I. The studies were based on assumptions set by their own interests, or even used the opinions of industry as the basis for findings. *They soon received strong criticism* from environmental groups, academic institutions, and the Commission’s own scientific research centre (see Annex I), for reasons including:

- neglecting the expected benefits of the EU Farm to Fork measures, or the impacts of not acting on soils, biodiversity, and climate;
- using models that are not fit for purpose, and failing to take into account crucial parameters, such as additional policies to reduce food waste and promote changes in diets to be more plant-based – both of which would make up for harvests being slightly lower. Also, changes are needed in the way farm subsidies are spent, and in the priorities set for trade agreements, while positive ecological feedback loops (eg better natural pest control from the restoration of agro-ecosystems) need to be taken into account.

In addition, various of the ‘impact studies’ promote industry’s most profitable but controversial ‘solutions’ to the climate and biodiversity crises, such as deregulation of genetically modified (GM) crops, as an alternative to pesticides reduction or to mitigate reduced yields. The main pesticide producers also being key players in the commercial seed market (Bayer, BASF, Syngenta and Corteva), *they have been pushing* for more than a decade to get products from new GM technologies like CRISPR-Cas deregulated, meaning they would no longer be tested for risks, nor labelled. (See Box 7).

The negative messages taken from these industry-funded ‘studies’ – that Farm to Fork targets will lead to a drop in EU agricultural production, an increase in imports and a reduction in global food security – have, moreover, been contradicted by other studies, such as those by the French National Centre for Scientific Research and French think tank IDDRI. The latter, for example, found that implementing Farm to Fork while shifting to agroecology practices and lower animal protein consumption could turn Europe from a net importer to a net exporter of calories (see Annex I).

Two of the six studies were commissioned by Copa-Cogeca and CropLife, together with a number of other agribusiness lobby groups (including Euroseeds and Fertilizers Europe) from Wageningen University (WUR) in the Netherlands. The WUR studies were intended to play a key role in the lobby campaign against the targets. Copa-Cogeca – in a previously leaked communications strategy – *outlined several outreach plans* for these impact studies and seemed to have *prior knowledge* of a *“package” of Euractiv articles* “to explain the common elements between the different impact assessments”. CropLife Europe’s leaked strategy document states that social media channels would be used to “amplify” the Wageningen study “to build ‘surround sound’ and pressure”.

The studies were presented during three major lobby events that took place in the week before the European Parliament's vote on its Farm to Fork report, scheduled for 19 October 2021:

- On 12 October 2021, [Euractiv hosted](#) an event funded by CropLife Europe [[Unknown AI](#)] entitled 'Farm to Fork: What the analysis and data tell us' with speakers including authors of the studies by JRC (Joint Research Centre, the Commission's science and knowledge service), USDA (US Department of Agriculture), and WUR. However, up until the day of the event there was no mention whatsoever on *Euractiv's* event page that the WUR study was financed by CropLife Europe (see [snapshot](#) on wayback machine here). Moreover, Wageningen's study had not even been published yet and only a [four-page](#) summary was available. Nonetheless, author Johan Bremmer set out the study's gloomy findings. The JRC speaker however said that the various 'impact studies' used models that are "not fit for purpose". Even USDA acknowledged the limited scope of the study. Ignoring the nuances of these discussions, CropLife Europe put out a [press release](#) on the same day with a host of other lobby groups including Copa-Cogeca, sugar industry's CEFS (European Association of Sugar Manufacturers), the European Council of Young Farmers CEJA, the cereal traders association COCERAL, meat producer platform 'European Livestock Voice', and Fertilizers Europe, demanding that "non-data based political targets" with "deleterious effects on European agriculture" must be replaced by "solution-oriented policies" based on the "data we have to hand".
- On 13 October 2021 European Livestock Voice ran a [webinar](#) entitled 'The Farm to Fork Strategy: what do studies say about its impact on the European Livestock Sector', featuring speakers from Wageningen and Kiel Universities (see Annex 1), and conservative MEP Anne Sander. The industry funding source of the Wageningen study (which was likewise not yet published, with only a [4-page summary](#) available) was mentioned. European Livestock Voice highlighted on its website that this webinar "complemented" the 12 October *Euractiv* event with CropLife.
- On 14 October 2021 [Euractiv hosted another event](#), sponsored by US pesticide corporation Corteva (formerly Dow-DuPont). Entitled 'The Challenge of Food Security', it [claimed](#) that Europe must prioritise technology and innovation to ensure its future sustainability. A Copa-Cogeca lobbyist mentioned the USDA, Kiel, and Wageningen studies with no mention of their industry sponsors, and repeated warnings of drops in production or higher prices.

The three events were far from balanced in their set up, since aside from representatives of studies used by the industry to fight the Farm to Fork strategy, they did not include speakers with a critical view on the 'impact studies'.

The sheer number of 'impact studies', and the number of corporate-sponsored events and media articles dedicated to them in a short period, resulted in a true echo chamber effect around the time of the Parliament vote. Numerous articles in national media copied the framing of the *Euractiv* story on the JRC study, as well as the other 'impact studies' with examples like the [Flemish agri news site Vilt](#) and Dutch agrifood sites like [Foodlog](#), [Akkerwijzer](#) and [Nieuwe Oogst](#).

However, the multiple critiques of the so-called impact studies, and the fact that Copa-Cogeca's strategy document got leaked into the public domain just before the vote, reversed the direction of the political debate. Many MEPs in the plenary debate criticized the 'impact' study lobby campaign. While many right-wing MEPs kept hammering on the 'impact studies' until the very last moment (see Box 4), the final Parliament vote supported the EU Farm to Fork objectives, including binding reduction targets.

## BOX 02

## University research for sale?

This is certainly not the first time that Wageningen University has been called out for its close ties to industry. Its Chair of the Board Louise Fresco [joined the Board of Syngenta](#) in 2019, and previously was a paid advisor to Unilever and Rabobank as well. Asked by Corporate Europe Observatory what the University thought of the role its study played in an industry lobbying campaign, a spokesperson responded: “We execute projects commissioned by a client in a scientific correct and transparent way (sic)”. However, the study was commissioned by the pesticide industry with a clear purpose, and the study’s preface explicitly states that CropLife Europe and CropLife International representatives “guided” and “supervised” the project. This supervision meant that WUR discussed their approach with CropLife, “presented intermediate results and received feedback, which we have processed if relevant”.

Wageningen rejects any further responsibility for how the study was used as a lobby tool, saying “The way our customers use the results in lobbying for their interest is beyond the boundaries of our influence”. However, this is contradicted by the fact that the Wageningen researchers presented the studies as key speakers in various industry-led lobby events. Asked whether their participation to lobby events was an obligatory part of the CropLife Europe job, the answer from WUR was no. WUR added that it is “customary for our researchers to present their results for the organizations that have commissioned the research. This can be a closed event or in the case of *Euractiv* a more open event. These presentations can have different shapes and forms. In this case it was CropLife that thought it useful to present the impact study at the *Euractiv* event”.

Corporate Europe Observatory also asked why the study did not include the expected environmental benefits of the Farm to Fork strategy. The response was that while “environmental impacts need to be included in evaluating the pros and cons of the policy interventions”, doing a full impact assessment was “unfortunately beyond the scope of the project”. Probed for the reasons that environmental aspects were not included, WUR responded: “Partial assignments are part and parcel of WUR’s work, specific areas, such as economic impact are investigated this time, environmental impacts the next.... It all depends on the assignment.”

In short, those who have the financial means to give such assignments to a university decide on the scope that is most convenient, leading to a partial picture. They get the added benefit of university researchers voluntarily presenting this partial picture at lobby events, and of the university’s own communication channels promoting the conclusions.

Wageningen refused to answer questions if it is undertaking any other work funded by pesticide corporations or CropLife Europe. Other Wageningen University researchers [were unhappy about](#) these types of studies undertaken on behalf of pesticide and other industries and [called for more coherence](#) between the farm subsidies and the Farm to Fork Strategy. Another Wageningen researcher praised the Commission for “finally showing some ambition” with the EU Green Deal, [as her research showed that](#) over 80 per cent of soils in Europe are contaminated by a cocktail of chemical pesticides and fertilizers.



## 3.2 FAST-FORWARD THREE MONTHS, A REPETITION OF EVENTS

On 25 January 2022 a [joint hearing](#) took place in the Parliament's Environment and Agriculture committees, on the impacts of the Farm to Fork Strategy, with authors of the US Department of Agriculture (USDA) and WUR papers once again brought out to present their studies' findings. The whole PR exercise was repeated. The CropLife-funded Wageningen study had finally [been published](#) in full. On that occasion, the university published a [press release](#) with a suggestive title: "Lower agriculture yield because of Green Deal". The Wageningen presenter however did not make any reference to their pesticide industry funders; only when questioned did he admit the study was financed by "interested" stakeholders.

Right-wing MEPs at the hearing echoed the warnings of economic impacts, but progressive ones pointed out the flaws of the studies. Biljana Borzan MEP (S&D) pointed out that continued biodiversity decline would "dwarf any losses" in productivity. Tilly Metz MEP (Greens) added that a study paid for by the pesticide lobby could not be taken seriously. Pierre-Marie Aubert of French think tank IDDRI, who also presented at the hearing, said that targets are "ambitious but unavoidable if we want to bring food system within planetary boundaries".

Jayson Beckman of the USDA's Economic Research Service (ERS) first said the ERS is independent and not political, and that the USDA study was done just because it was "a great research topic". Later in the hearing, however, he added that: "we wanted to get the discussion going – and I am glad that we did". As we will see in the next section, the US did a lot more than just this paper to get an international pushback going against the Farm to Fork.

On 24 January 2022, the day before the Farm to Fork hearing, a [Syngenta](#) sponsored [opinion piece](#) on *Euractiv* warned of the "serious unintended consequences" of the pesticide reduction target, citing the "recent" Wageningen study without mentioning industry's funding of it (Syngenta included, as a member of CropLife Europe) and called instead for public support and more industry-friendly rules for new technologies. On 27 January, [Euractiv hosted](#) yet another event, this time paid for by European Livestock Voice and the Agri-Food Chain Coalition – another lobby network [formed of](#) Copa-Cogeca, CropLife Europe, Euroseeds, Fertilizers Europe, Coceral, EuropaBio et al. The event announcement noted that environmental organisations had been "quick to highlight the shortcomings" of the papers, and discussed the question "what policy instruments are needed to reach the targets?". Speakers included young farmers lobby CEJA (a close ally of Copa-Cogeca), which pushed for a legislative framework to make gene editing a "viable instrument" for farmers – ie GM deregulation – in order to make Farm to Fork manageable. EPP MEP Herbert Dorfmann, meanwhile, claimed that Farm to Fork focuses on sustainability at the expense of food security. This event, unlike the previous ones, did include two speakers with a dissenting view.

In the weeks running up to the expected publication of the Commission proposal for a revised SUD, more events are lined up. On 9 and 10 March 2022 the [CropLife Europe annual conference](#) brings an opportunity for its members Bayer, Syngenta, BASF, and Corteva to speak alongside allies like Copa-Cogeca and ELO, and high-level Commission officials, on topics including the revision of the SUD – including the 50 per cent reduction target – and on pesticide standards and trade. This is followed by the annual Syngenta Forum for the Future of Agriculture (FFA), an event of several days starting 15 March 2022. The FFA can usually count on the presence of several Commissioners, this time Commission Vice President Timmermans and Health Commissioner Kyriakides, and claims it is "firmly established as the premier event of its type".

## BOX 03

## Corporate-sponsored media

These *Euractiv* events played an instrumental role in the lobby strategy of the pesticide industry and its ally Copa-Cogeca to derail ambitious pesticide targets. When asked for a reaction, *Euractiv* responded, “EURACTIV is indeed a leader in organising stakeholder debates on EU AgriFood policy. Contrary to what you seem to imply, it is important for us, our panelists and our viewers that our debates are balanced and constructive. We invite panelists representing different stakeholder positions and give each of them the same allocated time slot to speak. Corporate Europe Observatory, like all other stakeholders, is welcome to join our debates and also ask questions as an audience participant. Please join our debates at [Euractiv.com/events](https://euractiv.com/events).” In addition, *Euractiv*’s [editorial principles](#) state: “We maintain our independence with an innovative business model and do not privilege views from sponsors”.

However, the panels of the two *Euractiv* events held on 12 and 14 October were not quite “balanced”. On 12 October, all three speakers were authors of studies used by the industry to fight the Farm to Fork strategy. While the debate itself was more nuanced than the announcement, and the JRC speaker expressed points of critique on some of the studies, all speakers presented studies that did not take into account the environmental, long term benefits of the Farm to Fork targets. The majority of *Euractiv* events on agriculture are industry sponsored, and [clients give input](#) on the event topics, angles and speakers.

Of course *Euractiv* is not the only media catering to corporate lobby needs. Bayer’s 2021 entry in the EU lobbying transparency register showed a spend on Politico of € 300,000–399,000. In September 2021, for example, a Politico Pro Morning Agri and Food news roundup “Presented by Bayer”<sup>5</sup> profiled the “mounting evidence” against Farm to Fork, covering the Kiel/Grain Club study in particular, all whilst promoting Bayer’s voluntary commitments (see section 5). In the week of 21 February 2022 the Politico agriculture news roundup was sponsored by Bayer each day, laced with “messages from Bayer” such as:

“Going green sets ambitious targets for the transition of food production systems. Crop production in the EU could fall if the targets of the Green Deal were fully implemented. Inevitably, we will need to import more food and export less. Rising world food prices will trigger an expansion of agricultural production in regions with less ambitious sustainability targets. [...] Innovation is key! New breeding techniques and digital farming have the potential to respond to growing food demand while requiring fewer resources.”

<sup>5</sup> Politico Pro Morning Agri and Food: Gas spike hits — F2F backlash — UN talks, 21 Sep 2021.

## BOX 04

## The right-wing MEPs putting their efforts behind the pesticide lobby's agenda

Released documents show that in May 2020, Herbert Dorfmann, the coordinator for the European Parliament's Agriculture Committee for the conservative EPP group – and rapporteur on the Farm to Fork report – directly lobbied Commission President Ursula von der Leyen and a host of other Commissioners against “the imposition of new rules and restrictions on our farmers”. Dorfmann said it was “essential” the Farm to Fork and Biodiversity strategies be “postponed” because of the pandemic – reflecting the demands of close ally Copa-Cogeca, as Corporate Europe Observatory's October 2020 CAP vs Farm to Fork report explains.

Numerous other MEPs addressed written questions to the Commission, which replicated the demands of agri-industry lobbies for a ‘comprehensive’ or ‘cumulative’ impact assessment. Polish MEP Krzysztof Jurgiel of the conservative, eurosceptic group ECR, said farmers would lose income as a result of the Farm to Fork strategy while Austrian far-right ID MEPs Roman Haider and Georg Mayer even bemoaned the Farm to Fork's “forced overproduction of organically produced food”! The right-wing ECR group claimed that the impact studies showed “overly ambitious” pesticide targets would slash farmers' income.

By the October 2021 MEP vote on the Parliament's Farm to Fork report, a widespread mobilization of right-wing MEPs had developed. As Politico reported, the ECR group – in line with the farm lobby's wishes – forced a vote that could delete references to the targets being “binding” if it garnered enough support (which, thankfully, it did not).<sup>6</sup> Following the industry campaign, Herbert Dorfmann proposed an amendment to his own report calling for “robust, scientific ex ante impact assessments” that take into account “cumulative effects”. *Politico* also reported how, at the debate prior to the vote, “MEPs on the right of the political spectrum heaped criticism on the Commission” for allegedly delaying publication of the JRC report.<sup>7</sup>

<sup>6</sup> POLITICO Pro Morning Agri and Food: Farm to Fork vote – NGTs – F2F's African impact, 19 Oct 2021  
<sup>7</sup> POLITICO Pro Morning Agri and Food: Farm to Fork vote – NGTs – F2F's African impact, 19 Oct 2021



## 4 TACTIC B

### Third country pressure, US launches international anti-Farm to Fork coalition



The EU Green Deal and the EU Farm to Fork Strategy also have a global dimension. The EU *Farm to Fork Strategy aims to* “support the global transition to sustainable agri-food systems”. To this end, the EU will embark on efforts of “green diplomacy” and set up “green alliances on sustainable food systems with all its partners in bilateral, regional and multilateral fora”. This would also entail the EU “obtain[ing] ambitious commitments from third countries in key areas such as animal welfare, the use of pesticides and the fight against antimicrobial resistance”.

This provoked a strong reaction from the US, which has been *promoting industrial agriculture* both at home and abroad for decades. The US government also has a long history of acting in agribusiness’ interests abroad, through its embassies or via free trade agreements.

## BOX 05

### US government in bed with industry

Evidence of the agribusiness’ close relationship with USDA and other US government agencies, including the US Trade Representative, is abundant. *Internal government emails, for example, revealed* that Bayer and CropLife America worked closely with US officials to pressure Mexico into abandoning its intended ban on Bayer’s notorious herbicide glyphosate. As the *Center for Biological Diversity commented*, “We’re seeing more and more how the pesticide industry uses the US government to aggressively push its agenda on the international stage and quash any attempt by people in other countries to take control of their food supply”.

Meanwhile in Brussels, two major US interventions in the European Farm to Fork debate have made the headlines. The first concerned the USDA's 'impact study' with its dire warnings about the Farm to Fork's impacts on global food security, as described in the previous section. In September 2021 the US Government launched a second, much bigger attack on the EU Farm to Fork and Green Deal, showing the extent to which these plans present a threat to its favoured industrial agriculture model. This attack took the form of the newly created 'Coalition on Sustainable Productivity Growth for Food Security and Resource Conservation' (SPG), launched by US Agriculture Secretary Tom Vilsack, and which the US invited governments and industry lobby groups to join. The SPG coalition was formally launched at the September 2021 UN Food Systems Summit (UNFSS) organised by the UN Food and Agriculture Organisation (FAO).

## BOX 06

# Corporate capture at the UN

The September 2021 UN Food Systems Summit was widely *condemned* as corporate-captured by hundreds of food and farming groups due to the dominant role given to corporations over its agenda. The summit's process was shaped in a way *granting more influence* for the agribusiness sector, whilst side-lining the small-scale producers who *produce 70-80 per cent of the world's food*. This development came after the UN Food and Agriculture Organisation (FAO) entered into a controversial formal partnership with CropLife International in October 2020 which also led to an outcry from *civil society and scientists*, for *threatening* the FAO's integrity and credibility. The partnership involves a "multi-year joint work plan for common objectives", *as explained* by an FAO official in a webinar. As Sarojeni Rengam of PAN Asia Pacific *commented* "It is alarming how big business dominates in setting the direction of policymaking, as we have seen with the corporate capture of the UN Food Systems Summit. We expect that CropLife will take full advantage of this partnership with FAO to expand and consolidate corporate control over food and agriculture".


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### FAO and CropLife International strengthen commitment to promote agri-food systems transformation

QU Dongyu, FAO Director-General, and Giulia Di Tommaso, President and CEO of CropLife International, sign a Letter of Intent to explore new partnerships between the UN Agency and the private sector



FAO Director-General, QU Dongyu, meets Board Members of CropLife International in first virtual meeting.

**Related links**

- Hand-in-Hand Initiative
- CropLife International

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FAO Director-General, QU Dongyu, and Giulia Di Tommaso, President and CEO of CropLife International

The SPG coalition's prime goal is to challenge and avoid further uptake of the ideas underlying the EU Farm to Fork Strategy, such as reducing farmers' dependence on pesticides and other chemical inputs, and promoting organic farming. As Vilsack said in an [interview with Politico](#): "It's pretty clear there are two different pathways, and I think the United States and many other countries are going to go down one path [and] the EU is going to go down a different path". He argued that productivity growth need not be sacrificed for the climate if we invest in "climate-smart" technologies like gene-editing and digital or precision farming, a term that suggests using digital tools and robots or drones to apply chemical inputs in a more precise way. These 'solutions' are not only expensive, but also in part unproven, yet they would boost profits of agribusiness companies. These new technologies may well increase multinational corporations' control over the food chain, depending among others who will hold the data and the patents.

US farmers' lobby the American Farm Bureau Federation [told Politico](#) that the Farm to Fork will lead to new trade barriers if the EU decides to force other countries to "do things their way". By this they mean, if the EU adopts greener standards and applies these standards to goods imported from elsewhere. Commission Vice President [Timmermans defended](#) the EU's approach, noting that productivity growth can no longer be paramount, as the current system pushes the Earth past its limits. Green MEP Thomas Waitz, [described](#) the US coalition as promoting chemical-intensive systems that destroy the soil, while dismissing Vilsack's comments as a "blunt lobby appearance for the GMO sector". The fact that [Copa-Cogeca's](#) communications document described the US initiative as "the building of an anti-F2F group" (sic), confirms again that rolling back the EU Green Deal is the SPG's sole raison d'être.

The idea for the SPG coalition clearly did not come out of the blue. Vilsack was appointed by US President Biden as Agriculture Secretary [in February 2021](#) after a double spin of the revolving doors. Vilsack joined the Biden administration straight from being [President and Chief Executive](#) of the US Dairy Export Council (USDEC); before that he held the same job of US Agriculture Secretary under the Obama government. In September 2020, when he was still with the industrial dairy lobby, [Vilsack argued](#) the US was at a "critical point" in figuring out how to provide an "alternative story" to the EU's approach to farming and to the way the EU regulates pesticides and chemicals. One year later as US Agriculture Secretary, he turned this plan into reality with the SPG Coalition and its narrative focused on productivity growth.

While Vilsack argued that "There are a number of nations who believe strongly that we can't sacrifice productivity in order to reach a sustainability goal", only a handful of countries have joined the coalition so far [including](#) Brazil, Honduras, Liberia, and the Philippines. In contrast, a large group of corporations and lobby groups has joined the SPG coalition including Bayer, Corteva, Syngenta, CropLife America, and CropLife International. The latter [has described](#) how it supported the "formation" of the coalition, which it claims can "accelerate progress in meeting the world's growing nutrition needs without bankrupting farmers, consumers, and nature". Other members are Vilsack's own US Dairy Export Council (equally hostile to a potentially higher EU standards in dairy products, such as animal welfare), the US Soybean Export Council, and American Feed Industry Association. Perhaps unsurprising after its CropLife partnership (see Box 6), it is still very worrying that the UN FAO has also joined the SPG Coalition.



## 4.1 TRADE ASPECTS OF FARM TO FORK: “NO CHANGE – GAIN TIME”

CropLife’s [leaked social media strategy](#) shows just how much of a threat they see coming from the international ambitions in the Farm to Fork. In it, CropLife states as a key objective that they want to ensure the EU’s “green diplomacy is multilateral and is not imposed at the bilateral or regional level”. This is because in multilateral trade spaces (such as the World Trade Organisation), the US is always present to provide counter pressure to the EU.

When it comes to imports into Europe contaminated with residues of pesticides banned in the EU, CropLife’s objective is described as “no change – gain time” and “ensure stakeholder mobilisation – especially third countries”. In other words, as long as the EU does not move towards banning any imports contaminated with such pesticides, industry will have time to strengthen its position, for instance by lobbying foreign governments to take a hostile approach to any EU initiative in this direction.

Corporate Europe Observatory’s 2020 report [Toxic residues through the back door](#) showed how pesticide corporations and the US and Canadian governments crushed a plan by the European Commission to no longer allow any residues of certain hazardous pesticides – banned in Europe – to be present in food and feed imports.

The Von der Leyen Commission promised at least some improvements, to ban the residues of a few pesticides that contribute to global environmental problems such as pollinator decline, but [NGOs are demanding](#) a much more consistent approach, banning residues from all pesticides forbidden in Europe for health or environmental reasons. And now, under the French Presidency the EU has intensified discussions on so-called mirror clauses to get agricultural imports into the EU to meet the same environmental and other standards as EU production. Deforestation and pesticide use linked to monoculture production of soy, meat, or palm oil, feature heavily in these discussions. The US-initiated SPG coalition, as described, is a perfect example of such third country involvement to fight off such plans.

Another example is a [Euractiv lobby event](#) funded by the [European Landowners’ Organization \(ELO\)](#) on 22 February, with a focus on the alleged “unintended” impacts of EU Green Deal measures including action against deforestation and against pesticide use, on producers in the global south and on international trade. The event, with speakers from Canada, Brazil, and Kenya, warned that “the Green Deal architecture will have a significant human impact on rural activities around the globe” and that “new sustainability standards will most probably affect the EU-third countries trade relations”. However, the focus was not on the costs of the use of pesticides nor on the benefits of reducing that use. The chat box of this online event was full of pesticide industry lobbyists’ comments about the need for more impact assessment. Belgian lobbyist Diane Zune of Phytophar asked if it would not be “EU imperialism” to export EU standards to other countries.

## 5 TACTIC C

### Voluntary commitments and other distractions



Another way for industry to persuade politicians and decision-makers that there is no need for them to introduce binding rules is to propose non-binding voluntary actions and targets, which give the impression of supporting green goals, but which rarely lead to serious action or change on the ground. The list of such distractions that we have observed includes:

**Voluntary commitments** – In September 2020, *CropLife Europe (then called ECPA) informed* Agriculture Commissioner Wojciechowski that its member companies have adopted “six voluntary commitments to support the Green Deal ambitions” and met with DG Sante *to promote them*. “(H)ow to best achieve sustainability is a complex debate”, *CropLife said*, which “all relevant parties have to engage in together, with open minds”. Its six voluntary commitments for 2030 *include for instance* investing €10 billion into digital and precision farming innovation (including digital tools for instance to collect field or climate data, drones), and another €4 billion into biopesticides (substances to control pests, derived from natural sources like plants or micro-organisms, or from minerals) innovation. While this may sound laudable: 1) these commitments are voluntary and therefore may not happen, 2) there are big concerns that digital tools will be too expensive for many farmers and will increase the corporate control over their production methods, and 3) compared to a *€2 billion annual R&D budget* for Bayer in agriculture alone, one would need to know how these figures compare to continued investment in synthetic pesticides, in order to judge whether this means a real shift.

The other commitments focused on container collection and recycling, and more training of farmers, including in Integrated Pest Management (IPM). CropLife Europe also promoted its voluntary goals in its February 2021 answers to DG Sante’s questions about the future SUD (see section 5), which *CropLife said* “should move away from a strict restriction-based approach”.

Bayer *tried a similar tactic and presented* the Commission its own sustainability targets for 2030, including a 30 per cent reduction in pesticides’ environmental impacts. This would be achieved using “a range of tools eg modern application technology, seeds, and reduced doses using digital technology”. Asked by the Commission what specific tools they had in mind to achieve its target, *Bayer said* “it is not yet known”.

*Targets have been tried and failed* – *CropLife told* the Commission that reduction targets are not a “novel idea” and tried to warn the Commission off. “CropLife Europe encourages the EC to look into past experiences where Member States have tried this approach and learn from its shortcomings”, adding that European agriculture is complex, with diverse conditions and challenges. Grain traders lobby group *COCERAL echoed* these arguments. In a similar way, in an April 2021 meeting with EVP Timmermans’ cabinet, *Syngenta urged* the Commission not to set “proxy targets” for the reduction of pesticides, because “it is more logical to target soil carbon and biodiversity levels”, which can be improved using “a mix of measures and technologies”.

**Corporate lobbies** – from *CropLife Europe, CEFS, Copa-Cogeca, and European Livestock Voice*, as well as *joint-efforts* by AnimalHealthEurope, CEJA, Copa-Cogeca, Euroseeds, Fertilizers Europe, and others – repeatedly demanded the Commission take a “science-based” (or “fact-based”, or “evidence-based”) approach to the Farm to Fork targets. To the pesticide industry, this does not mean that targets should be decided on a scientific assessment of the harmful impacts of pesticide use, even though there is plenty of evidence of that. *An explanation given* by then director-general of CropLife Europe, Geraldine Kutas, at a Politico event they sponsored, suggested that “science-based targets” to them means to decide on them after doing a “cumulative impact assessment” of all targets combined, and to promote “innovative solutions”.

Look what has been done already – Sugar manufacturers’ lobby CEFS also *attempted to sweeten* its lobbying against an “unrealistic compulsory EU target” for organic farming in November 2020 by “calling on the Commission to consider what our sector has achieved over the years on [a] social, economic, and environmental level regarding conventional sugar”. *Copa-Cogeca used* its September 2020 Business Forum to showcase how its members are already “contributing to the green and circular transition and climate neutrality”. In a similar vein, at a December 2021 event sponsored by fertilizer giant Yara, the *European Landowners’ Organization launched* its own voluntary label called ‘AgriLife’ to “reward farmers at the center of biodiversity” and to promote “quality production through best practices”.

## 6 TACTIC D

### Opposing a push for organic



The EU Farm to Fork organic target goes hand in hand with the pesticide reduction target, since an increase in organic production will automatically lead to less pesticide use. This has been a great annoyance for the agribusiness lobbies, as the organic production model does not bring them a lot of profit. Grain traders’ lobby *COCERAL told DG Sante* that “we don’t deem the increase in organic as the solution but sustainable practices, whether organic or not”. Bayer wrote in sponsored Politico content that a more “diversified” approach embracing a wide range of practices – “organic, sustainable intensification, regenerative, agro-ecological, modern”<sup>8</sup> – is needed. *CropLife Europe told the Commission* that its focus should be on “farm performance and outcomes, rather than on any particular farming model used”, while *Copa-Cogeca questioned* the viability of the 25 per cent organic target saying “we can learn from organic farmers, but we should not oversupply the market”.

*CropLife only says* to support “increased organic agriculture” if “the resulting reduction in European agricultural productivity does not lead to unintended land use changes in other parts of the world, which could have detrimental effects on biodiversity and climate.” This is another scaremongering argument, in addition to claims of higher food prices, etc. If CropLife was seriously worried about deforestation in South America, it could be calling for less meat production in Europe, for instance, or for a more plant-based diet. Instead, they again choose to ignore the many hidden costs of industrial agriculture that goes with a high pesticide use, which would be avoided with a shift towards organic production.

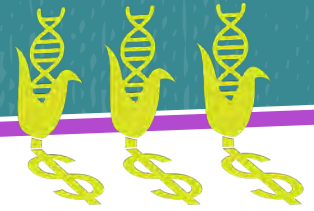
At the same time *CropLife argues* that biopesticides must not replace chemical ones but be a “complementary” tool – otherwise, it claims, farmers will “lose tools faster than new ones can be found” and yields will drop.

<sup>8</sup> POLITICO Pro Morning Agri and Food: Gas spike hits – F2F backlash – UN talks, 21 Sep 2021.



## 7 TACTIC E

### Techno-fixes and false solutions



With binding pesticide targets looming via the upcoming SUD, the pesticide industry is desperate to be seen as a “partner in providing solutions”, and to find ways to make up for any potential loss in profits from pesticides. Instead of pesticide reduction targets, the industry proposes ‘digital and precision farming’, and new GM techniques (see Box 7). As [described by the organisation GRAIN](#), Bayer, BASF, and Syngenta all have mobile apps available, now already used on millions of hectares of farms.

Bayer, for instance proposed to the Commission a new “joint vision” for agriculture “open to advancements in innovation and technology”, a vision in which Bayer “actively contributes to the debate”. Bayer said the challenges we face are too serious to continue “engaging in ideological debates”. Of course, this is deeply spurious considering Bayer’s *raison d’être* is to sell as many of its (largely chemical) products as possible. And despite the promises of “innovation”, Bayer [does not even refrain](#) from promoting its notorious GM herbicide-tolerant (HT) soybeans (which are literally designed to be applied with pesticides) as sustainable in EU Green Deal discussions. They have been making absurd claims that herbicide-tolerant soy is a “critical part of the solution to stop deforestation, not the root cause of deforestation”, because, Bayer claims, they would generate high yields therefore you need less land.

In a similar vein, [CropLife told DG Sante](#) that policy-makers should “look to harness the potential of digital technologies” as an “alternative” to stricter pesticides regulation. They added that any consideration of reduction targets must go hand in hand with “an increase in the acceptance of innovation and new technologies and an enabling framework for doing so”, in order to “replenish the farmer’s toolbox” including with precision and digital tools.

This includes demands to allow aerial spraying of pesticides again (which is banned under the current rules, except under specific derogations) – but via drones. Both Bayer and CropLife Europe lobbied DG Sante in this respect. [CropLife told Sante](#) that drones are “a new technology with a huge potential and that SUD should not close the door”. The Commission’s replies remained sceptical, but this did not deter the two from insisting that the revised SUD law should be a vehicle for farmers for taking up “innovative tools such as precision and digital technologies”, therefore [they argued](#) that drones should not be seen as aerial application. They proposed the new SUD should clearly differentiate between drone and conventional aerial application, while “more data about the safety of drones” could be added once generated.

Essentially admitting there isn’t yet enough data to show drone application is safe, [CropLife also wanted to make sure](#) industry would be in control of any new studies. They proposed a multi-stakeholder platform – with “participants from industry, machinery producers and other experts” – that would provide member states with a “harmonized set of guidelines on the generation of data on the use, safety and benefits of drone application”. Nor did the lobbying stop there. Later on in April 2021, CropLife urged DG Sante to allow aerial spraying with controls rather than include drones under the general prohibition for aerial spraying. While derogations from such general prohibition are a possibility, they [added that](#) “derogations give a negative message for a new technology”. CropLife also referred to a US-based industry-sponsored task force doing research on drone pesticide application. The [leaked draft proposal](#) for the revised SUD indeed would allow the Commission to make an exception for “certain categories of aircraft used for aerial application without requiring an application for a derogation”, if they have evidence to show that such aircraft would help to reduce pesticide use compared to land-based vehicles.

**BOX 07**

## Deregulation of new GMO's 'needed' for Farm to Fork

For over a decade biotech multinationals have been pushing the EU to deregulate new GM techniques like CRISPR-Cas, also called genome editing or new genomic techniques. Following a meeting with Agriculture Commissioner Wojciechowski in January 2021, [CroppLife Europe](#) sent DG Agriculture its Farm to Fork position paper, which calls for an enabling regulatory environment for “plant breeding innovation” ie GMOs. By this they mean that the current GMO rules would not have to be followed for most applications of these techniques. And this means, no environment or health risk assessment, no monitoring and no consumer labelling.

In a similar way [sugar manufacturers lobby CEFS told](#) Commissioner Wojciechowski's cabinet that any reduction in pesticides be accompanied by “a clear framework that allows the development and use of new innovative techniques including biotechnology”. A fear-mongering [CEFS brochure warned](#) that quantitative pesticides targets could lead to “dead-end situations” for farmers unless the development and use of biotechnology and “new genomic techniques” was allowed.

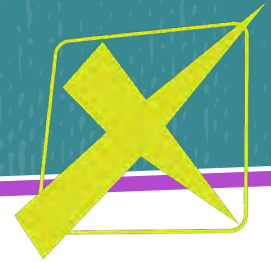
Several of the infamous ‘impact studies, such as the ones commissioned by Euroseeds and CropLife, argued that the Farm to Fork targets can “hardly be achieved” unless new technologies get subsidised and new GMOs get deregulated.

Indeed in April 2021 DG Sante published [a report](#) on new GMO techniques, in which they claim the current GMO rules are “not fit for purpose”, therefore opening the door for the deregulation of new GMOs.

## 8

## TACTIC F

## Co-opting IPM as a route for agri-industry false solutions?



Integrated Pest Management (IPM, a system of managing pests, diseases, and weeds<sup>9</sup>) is a **tool** promoted in the Sustainable Use Directive (SUD), and intended to give priority to non-chemical methods wherever possible.

According to the IPM-triangle, chemical pesticides should be **used only as a last resort** – if at all. Nevertheless, the pesticide lobby is describing it as a ‘cornerstone’ of the future SUD. It seems the industry spotted the fact that in the previous SUD, a complete lack of record-keeping and enforcement of this system by member states (see Annex 3) **was identified** as the key failure of the Directive, and a key rationale for its revision. Perhaps they are hoping for more of the same, hidden under the green credentials of being seen to promote IPM?

Indeed, **CropLife Europe has boasted** to the Commission of its voluntary commitments, which included “the training of 1 million farmers in IPM”. It seems that IPM is easy for industry to endorse because of the challenges of monitoring it, combined with industry’s attempts to portray IPM as a “toolbox” in which pesticides are simply one “tool” among many, rather than an absolute last resort.

For example:

- Both **CropLife Europe** and **Copa-Cogeca** insist that synthetic pesticides are an “essential element” of IPM, and that “all duly authorised products are part of the farmers toolbox when it comes to defining IPM strategies”. CropLife even tries to substitute the IPM-triangle **for an IPM-donut**, an image in which chemical pesticides are visualised as part of IPM on equal footing with all other methods to protect crops from pests.
- **CropLife argues** that IPM should be “the cornerstone of the SUD” as opposed to “restriction-based” options like bans, binding targets, taxation, or colour-coding systems
- Asked in a survey whether the general public or residents should be better informed when pesticides are used in their local area, **CropLife recommended** highlighting IPM initiatives and communicating the benefits of using (and risks of not using) pesticides – a “vital and necessary tool for farmers to ensure their competitiveness” – whilst “avoiding misinformation and fear-mongering campaigns”.
- In a lobby meeting of CropLife Europe (attended by BASF, Corteva, Bayer, and Syngenta) with the Commission, **the option was even raised** that EU member states would approve IPM crop-specific guidelines designed by industry. Clearly it would be a recipe-for-failure if vested pesticide interests were allowed to draft any IPM guidelines.
- CropLife Europe promoted the use of both digital tools and GMOs to be integrated in IPM systems, which would fit with their new business model.

<sup>9</sup> According to **PAN UK**, “IPM tackles pests and diseases through the use of a combination of different control methods, based on good crop husbandry, physical, plant breeding or biological control methods, underpinned by effective pest, weed and disease monitoring strategies. Properly implemented, IPM systems can effectively deal with harmful pests and diseases whilst maintaining crop yields and farmer income”



## 9 TACTIC G

### Undermine enforcement by lack of good data



Having the right data on pesticides use is key to measure the success of reduction targets. The EU's agricultural statistics rules introduced in 2009 contained major weaknesses. For instance, data on pesticide use must be submitted by EU countries only once every five years, and only for crops deemed relevant by each member state itself. The statistics published by Eurostat are, according to the European Court of Auditors, not detailed enough, not harmonised and not up to date. In sum we lack meaningful data on which pesticides are used where, when, and in what quantities in order to produce our food.

In January 2021 the European Commission adopted a proposal for a new Regulation on Statistics on Agricultural Inputs and Outputs (SAIO) to improve the situation. What is at stake is the ability to assess if promises on sustainable farming are being fulfilled. SAIO will be key to the effective implementation of the SUD and the pesticides targets in the Farm to Fork, providing it ensures regular publication of sale and use data at a granular level – in other words, per active substance, per product, per year, per local administrative unit, etc.

It is, therefore, no surprise that the SAIO review has been a topic of discussion in Commission lobby meetings with the pesticides industry: an ineffective SAIO would drastically undermine ambitious pesticide goals and would help maintain corporate profits from pesticides' sales. That said, it is clear that the pesticides lobby does not feel it can explicitly lobby against revamped rules – instead, it cautions against additional 'burdens', and for 'pragmatic' solutions. CropLife Europe wrote to the Commission at several occasions (here and here) cautioning that better data collection "should in no way lead to further administrative burden for European farmers" (a message echoed by both farm lobby Copa Cogeca and seed lobby Euroseeds). CropLife Europe also insisted the Commission must take a "feasible and practical approach" to pesticides statistics collection. Bayer and CropLife Europe also discussed the SAIO during lobby meetings with DG Sante.

The European Commission proposal would improve the current rules, requiring member states to submit statistics on pesticide use on an annual basis instead of every five years as is currently the case, and improve the way the data are being gathered at farm level. The European Parliament further improved the proposal, but a number of national governments in the Council then diluted it in far-reaching ways. As revealed by PAN Europe and GLOBAL2000, a group of ten member states coordinated among themselves to undermine the Commission proposal (Austria, Czech Republic, Denmark, Germany (former government), Hungary, Ireland, Netherlands, Poland, Slovenia, and Spain). For instance, when SAIO was discussed in November 2020 and April 2021, certain member states raised multiple objections to more detailed, more frequent, or more useful format reporting. The former German Government, supported by Poland, Austria, Finland, and France, complained that annual reporting of data is too "time consuming and costly". Ireland echoed the same objections, while the Netherlands argued that it was not feasible to collect sales data reflecting different uses like agriculture, forestry, or use in public green areas.

Final negotiations on the SAIO are currently ongoing between the three EU institutions.

**BOX 08**

## Pesticide use data for profit and control?

The pesticide industry from its side sees the SAIO also as an opportunity for profit and control. They lobbied for the use of the digital farming technologies that they sell – such as “smart sprayers” or drones – in SAIO data collection, to help “relieve burdens” on farmers. But this risks opening the door to dangerous limitations to public access to these important data, resulting from data ownership agreements and commercial confidentiality.

CropLife Europe and other agribusiness lobby groups have already developed their own, non-binding Code of Conduct on agricultural data sharing which does not aim to improve transparency nor access of the data to the public, but rather to provide “safeguards” for data considered as personal, sensitive, or “confidential information from the point of view of many agro-businesses”. It focuses on data producers (ie farmers) being able to control who can access and use the data, and on guaranteeing both farmer and company the “right to protect” sensitive information, trade secrets and intellectual property.

Alice Bernard of environmental law organisation ClientEarth comments: “It is important to remember that the Aarhus Convention grants all citizens the right to know about emissions into the environment – such as pesticides. This [right] overrides protection of personal data and commercial confidentiality. Therefore any step toward enabling companies with a vested interest in pesticides to control or limit data on pesticide use must be resisted.”

Some amendments proposed in the European Parliament however echo the industry tactic and could pave the way to making SAIO data “private” or subject to “data ownership” rights. An amendment tabled by the right-wing EPP shadow rapporteurs Asim Ademov and Simone Schmiedtbauer led to the inclusion of “private rights” and “data ownership” in the Parliament’s final report on SAIO. Another amendment introduced a reference to “voluntary guidelines” such as the industry’s own Code of Conduct. The issue, Client Earth explains, is that references to this industry code in the revised SAIO regulation could create potential barriers to the publication of the data, which would hamper the effective implementation of a pesticide reduction target.

# 10 SUD REVISION

## Compromises from the outset?

To help decide the direction of the proposal for a revised SUD, the Commission (DG Sante) has commissioned various reports from consultants, and has organized various consultations and stakeholder events. However, NGOs and other organisations critical of the use of pesticides have complained that their voices have not been sufficiently taken into account in this process.

A 'targeted survey' orchestrated by the Ramboll Institute for a study (commissioned by DG Sante) evaluating the SUD and assessing the impacts of its possible revision, received 53 responses from member states, 32 from NGOs and consumer organisations, and 194 from the pesticide industry and professional users.

The [study acknowledged](#) that the environmental and health-related problems caused by pesticide use "have remained unchanged or even been aggravated, thus underlining the relevance of a strong legislation to regulate the use of pesticides". It added that "a stronger awareness among consumers and society at large acts as drivers for change, however the situation is uneven among Member States". The effectiveness of the SUD was difficult to measure, it said, but the "likely benefits clearly outweighed the costs". As for the impacts, Ramboll said it had reviewed the "state-of-the-art literature" on the environmental, social, and economic impacts of pesticide use, but also referred to "recent studies" including the Coceral and the USDA papers.

Ramboll tried to assess impacts for several policy options. However, the very highest ambition option was the 50 per cent pesticide reduction target by 2030 as already committed to by the European Commission in its Farm to Fork strategy. Pesticide Action Network's Henriette Christensen during one stakeholder event pointed out that the EU's failure to properly implement the current SUD means that the higher-ambition option should have been included. She also mentioned the 1.2 million people that had just supported a European Citizens Initiative demanding much more ambition: an 80 per cent reduction target by 2030, and a complete phase out of synthetic pesticides by 2035.

Henriette Christensen commented: "Ramboll's study was very biased towards economic stakeholders. At the last stakeholder meeting in autumn 2021, Ramboll's presentation focused a lot on precision farming and the use of drones, but did not mention crop rotation".

Noa Simon Delso of Beelife also told the Commission that their views had not been fairly taken into account. She opposed the emphasis in the Ramboll study of contributions made by new technologies like drones and new GMOs. Representatives of IBMA (International Biocontrol Manufacturers Association), and the organic sector organisation IFOAM Organics, also complained that their views had not been properly taken into account.

Another study commissioned by DG Sante and carried out by the RAND consultancy equally failed to include more ambitious scenarios. Henriette Christensen (PAN-Europe) comments: "All scenarios of the RAND study should have taken the Farm to Fork target of 50 per cent pesticide reduction as a base line. Instead, this target was turned into the most ambitious option! At least one of the options should have included the 80% reduction target, with the Save Bees and Farmers European Citizens Initiative going on. RAND's scenarios too, like the Ramboll study, focused largely on technological solutions like precision farming and drones. This was a big disappointment."

She confirms that many studies [recommended by her organisation](#) in the consultation were not considered by the consultants. "The result unfortunately is that both studies fall short in supporting many important elements in the Farm to Fork and Biodiversity strategies, that aim for an ecological transition of the food and farming system". She added, "However, the quality and design of these studies are in the end the responsibility of DG Sante."



## 10.1 A NEW LAW – STANDING UP TO THE CHALLENGE?

In early February 2022 [a European Commission document](#) was leaked setting out three options that are being considered to reform the SUD. The Commission's stated preferred option would come down to a 50 per cent binding target for the EU level while member states would set their own national reduction targets with annual reporting. All pesticides would be banned from use in urban areas. Importantly the new law would be a Regulation, not a Directive, giving EU member states less space for weaker interpretations.

But PAN-Europe [criticised the leaked draft options](#) for lack of ambition, giving member states “numerous possibilities to derail the objectives of the Green Deal” and lacking “the change in mindset that the EU needs to embrace the transition of agriculture towards sustainable practices”.

Meanwhile, the European Citizens Initiative, calling for much more ambition, and which secured 1.2 million signatures is due to be the subject of a hearing in the European Parliament expected before the summer, to be attended by the Commission which will have to consider its demands. Therefore the Commission could be expected to have anticipated this by considering options that have the 50 per cent reduction as the minimum benchmark.

### BOX 09

## Member States push against pesticide reduction plans

Documents released under freedom of information law give an insight into the member states who've been resisting the Farm to Fork's pesticide reduction targets and the effective implementation of the Sustainable Use Directive (SUD) – often echoing industry's arguments, and reflecting their own poor performance on pesticides (see Annex 3). For example, Finland, Ireland, Greece, Croatia, and Slovenia all pushed against legally binding EU pesticides targets during meetings with the Commission. [Hungary](#) said the targets “can't be supported” at member state level, and [Lithuania argued](#) there was “no need for penalties” for not achieving them.<sup>10</sup>

The Czech Republic, Hungary, Poland, and Slovakia [warned DG Agri](#) against “overambitious reduction objectives” that could reduce EU agricultural production, calling for a “holistic and combined” impact assessment – a mirror of industry demands. [Greece](#) and the [Netherlands](#) echoed this call.

Ireland, Hungary, Cyprus, Greece, and Portugal also told the Commission they opposed higher taxation of more hazardous pesticides, for example saying that taxation should stay at national level, or that it would promote illegal use.<sup>11</sup> Similarly, several member states opposed a prescription system for pesticides as too high an administrative burden, including Finland, Ireland, Belgium, Estonia, Lithuania and Portugal.<sup>12</sup>

<sup>10</sup> DG Sante 2021/3581, Documents 22 (FI), 32 (IE), 20 (EL), 30 (HR), 52 (SI), 24 (HU), 36 (LT).

<sup>11</sup> DG Sante 2021/3581, Documents 32 (IE), 24 (HU), 14 (CY), 20 (EL), 46 (PT).

<sup>12</sup> DG Sante 2021/3581, Documents 22 (FI), 32 (IE), 8 (BE), 18 (EE), 36 (LT), 46 (PT).

# 11 CONCLUSION

## Compromises from the outset?

All eyes will now be on the European Commission when publishes its proposal for a revised Sustainable Use of Pesticides law on 23 March, that will include a pesticide reduction target. Will it have the political courage to go beyond a 50 per cent reduction of pesticides, to make the target enforceable, and to support farmers in this process? When the proposal is published, it will be discussed in the European Parliament. While the Parliament's Farm to Fork opinion supported a 50 per cent binding reduction target, the leadership of its agriculture committee has already joined the chorus of lobby groups using the war in Ukraine as an excuse to abandon the EU Farm to Fork goals. It will also be hotly debated by the EU national governments in the Council, largely outside of public scrutiny. It will be a test for all three EU institutions whether they are finally ready to address the biodiversity crisis and move towards a more sustainable food system, despite an immense and well-resourced lobby campaign by the pesticide industry.

# ANNEX 1

## A TIMELINE OF VESTED-INTEREST IMPACT ASSESSMENTS AIMING TO BURY FARM TO FORK (F2F)

WHEN?	WHO?	WHAT
NOV 2020	USDA	<p>The US Department of Agriculture (USDA) – which has documented close ties to the US agrichemical and GM industry (see Section 4) – published a remarkably inflammatory <a href="#">report in November 2020</a> claiming that the EU's F2F and Biodiversity strategies could <a href="#">cause global hunger</a>. Its <a href="#">projections included</a> that the total value of EU agricultural output would shrink by 12%, domestic prices would rise by 17%, and global commodity prices by 9%, EU exports would drop by 20% and the number of people suffering from food insecurity globally would rise by 22 million. Reduced trade, and trade restrictions on countries that don't adopt similar agricultural policies, were also of particular concern (see 2.2). However, <a href="#">USDA itself notes that</a> its analysis was limited to agricultural input reductions (ie the pesticides and fertilizers targets) and does not consider "increased land in organic production or reductions of food waste and greenhouse gas emissions" or any benefits to the environment and human health.</p> <p>Ignoring F2F's food waste reduction goals and its encouragement of more plant-based diets makes no sense in an analysis of the impact of reduced agricultural production on food security. As Helmholtz Centre for Environmental Research <a href="#">noted</a>, global food production exceeds dietary needs; the real challenge is food distribution and inequity in access. <a href="#">French agronomy institute Inrae</a> dismissed USDA's pessimistic findings as a result of a simplistic approach, which ignore changing farm practices and consumer trends, as well as "the environmental and health costs of current agricultural practices (eg nitrogen, pesticides)". An <a href="#">Inrae study</a> with French think tank IDDRI, meanwhile, found that an ambitious agroecological transition across Europe, combined with demand-side changes (ie less animal and ultra-processed food diets), would turn the EU from a net importer of calories (by 11%) and proteins to a net exporter of calories (by 12%), thereby contributing to global food security. And unlike USDA (and many of the industry-funded studies), which used a market-equilibrium model that cannot account for demand-side changes, the IDDRI study uses a biomass-equilibrium model, which considers physical limits and captures the system-level changes necessary to bring food systems back within planetary boundaries.</p>
MAY 2021	EUROSEEDS/ HFFA	<p>Seed sector lobby group EUROSEEDS – whose <a href="#">members include</a> GMO seed giants Bayer, Syngenta, and Corteva – hired consultancy HFFA Research to produce <a href="#">a study</a> on plant breeding's <a href="#">ability to</a> "compensate production losses potentially resulting from" the F2F and Biodiversity strategies: the "seed sector can help mitigate negative impacts provided that breeders are given access to the 'full toolbox' of latest technologies, such as novel genomic techniques". In other words, if Europe would just weaken its GMO rules. The study <a href="#">finds that</a> production and market supply losses due to the strategies could "potentially" be halved with "continually occurring genetic crop improvement" in the next decade, as could the "negative consequences" on global land use and related GHGs. However, the <a href="#">negative impacts HFFA predicts</a> are "much lower than the corresponding impact calculated in the much-criticized" USDA study, which "suffers from various questionable assumptions and methodological shortcomings". HFFA's projections of the "partial impacts" of the four main targets (again ignoring demand-side F2F actions re. food waste, changing diets, etc) are, it says, "highly" speculative and describe "only one of many possible future outcomes".</p>



Nonetheless, its methodology shows that its projected outcome is still too pessimistic: for example, the study interprets the 10% high-diversity landscape features target as a 10% reduction in “overall arable production”, however, we’re already at 4.7%, according to the JRC ([speaking at](#) the October 2021 *Euractiv*-CropLife event), so this reduction should be 5% not 10%.

The paper recommends “speeding up processes aiming at genetic crop improvements”, using “all available technologies” including new plant breeding technologies, more public R&D support and “public awareness raising”, and “proportionate” regulatory framework that encourages rather than “delaying or even hindering European plant breeders”. Essentially, it replicates the GM lobby’s regulatory wish-list.

JUNE 2021	COCERAL	<p>COCERAL, the European association of trade in cereals, oilseeds, pulses, olive oil, oils and fats, animal feed, and agro-supply, <a href="#">hosted a debate</a> in June 2021 to “share its impact assessment” evaluating F2F. Despite calling it an impact assessment, COCERAL’s <a href="#">press release</a> explains that it is “not academic in nature nor based on intricate modelling”, but merely the opinions of its members: “an empirical evaluation put together by analysts and business operators from a dozen companies and national associations, members of COCERAL, which looked at how the EU’s agri production would be transformed.” COCERAL’s findings – which still do not appear to be published on its website (as of 5 March 2022) – were presented by <i>Archer Daniels Midland (ADM), a US multinational food processing and commodities trading corporation, which warned that F2F targets could turn Europe from a big exporter to a big importer. Predicting sharp drops in wheat and rapeseed production, COCERAL said “the risks of destabilising agricultural markets and displacing environmental problems to other parts of the world showed the EU needed a detailed impact assessment of its green goals.”</i></p>
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A study by French National Centre for Scientific Research (CNRS), by contrast, found that Europe could feed its population – and still export cereals – in 2050, through agroecology (including crop rotation with nitrogen-fixing legumes, reducing the need for chemicals), evolving diets toward fewer animal products (eliminating feed imports), and bringing together crops and livestock (for optimal manure recycling).

JUNE 2021	GRAIN CLUB/ KIEL UNIVERSITY	<p>German agribusiness alliance <a href="#">The Grain Club</a> announced its “impact assessment study” of the Farm to Fork and Biodiversity strategies in September 2021, produced on its behalf by the Institute of Agricultural Economics at Kiel University. The <a href="#">Grain Club press release</a> proclaims that agricultural emissions reductions in the EU would be offset by increases elsewhere, and pits the biodiversity and climate goals against security of food supply, as if they were opposing objectives. This approach is both short-termist and incoherent, since protecting biodiversity and climate are pre-requisites to food security in the medium and long-term. The tone of the study’s executive summary – which exclaims that “The F2F Strategy is not effective against climate change!” (a quote latched on to by Copa-Cogeca) – is somewhat at odds with the findings it presents, which include that F2F measures will significantly increase the ecosystem services of all EU member states, and significantly reduce EU agricultural GHG emissions. The problem, the study says, is that by reducing yields in the EU, F2F would cause big increases in production (especially animal production) in non-EU countries. This ignores changing diets and reductions in food waste (though the study later recommends tackling food waste to reduce carbon leakage), not to mention that other countries are also obliged to reduce emissions, including from agriculture.<sup>13</sup></p>
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<sup>13</sup> The study also suggests that F2F would have negative impacts on Land-Use, Land-Use Change and Forestry (LULUCF) in the EU, due to the transformation of forest into agricultural land – but it actually finds that the pesticides reduction and increased organic farming targets would actually have a positive effect on LULUCF, and that only the extension of high diversity landscape features has a negative effect. It also notes that controlling LULUCF effects in the EU is relatively easy to achieve through regulatory measures. In addition, despite finding that the increased organic farming targets would actually have a positive effect on LULUCF, its recommendations do not seem to follow, saying that “restricting agricultural production to specific technologies without any evidence-based foundations that these technologies contribute effectively and efficiently to achieving the set goals of the Green Deal, appear rather ineffective. A good case in point is the extension of organic farming to 25%.”

Interestingly, [the study also predicts](#) significant improvements in the income and welfare of farmers, especially livestock farmers, a finding which has been ignored by Copa-Cogeca in its press release using the study. Also contrary to the study's portrayal by agribusiness, the [study's author](#) said the Green Deal – of which F2F is central – offers a “win-win situation for total society as the benefits more than compensate for losses from reduced conventional farm production.”

OCT 2021	CROPLIFE ET AL / WAGENINGEN	<p>The week before MEPs voted on the F2F in October 2021, Wageningen Economic Research (WUR) <a href="#">published the findings of a study</a> commissioned by CropLife Europe, CropLife International and “several agri-food chain stakeholders”. Launched at a CropLife-sponsored <i>Euractiv</i> event, WUR's ‘impact assessment’ of the F2F targets on crop production was based on just 25 case studies, on only 10 crops in seven member states: its findings predict an average 10-20% reduction in production (in some cases close to 0 but others 30%). The study itself (which <a href="#">refers to the project being “supervised”</a> by CropLife Europe) was not published until <a href="#">January 2022</a> – when it got another round of coverage <a href="#">from its industry sponsors</a>. The main recommendation in the executive summary published in October 2021 was “removing legislative barriers to new breeding techniques” ie new GM technology like gene-editing.</p>
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Despite CropLife's obsession with the need for a ‘holistic’ IA on all the targets, none of the four scenarios in WUR's study attempt to cover all of the targets, at most combining the pesticides targets with those on fertilizers, nutrients, and high-diversity landscape features, but leaving out the organic target (which should itself reduce pesticide demand). The WUR researcher at CropLife's October 2021 *Euractiv* event admitted limitations to their approach, and noted that they had not looked at changes in the food chain at all (eg reduced waste, changing diets), nor focused on GHGs, biodiversity, or positive impacts of the targets. In addition to this, Wageningen University [Professor Jeroen Candel](#) has [critiqued](#) WUR and the other F2F studies for not looking at the consequences of no action being taken. The study's findings were nonetheless seized on by CropLife and other lobbies to push against any binding targets in F2F and for a ‘cumulative’ IA.

OCT 2021	COPACOGECA ET AL / WAGENINGEN	<p>Also in October 2021, the week before a key MEP vote on F2F, Wageningen Economic Research (WUR) published the findings of a second study, commissioned by Copa-Cogeca, farm animal breeders lobby EFFAB, Animal Health Europe, poultry lobby AVEC, feed manufacturers lobby FEFAC and dairy lobby EDA – all members of European Livestock Voice, <a href="#">who launched the findings at a lobby event</a>. Based on a “literature review and consultations with sector and theme experts”, it focused on the impact on livestock farmers' incomes (with “simulated impacts” for 13 farm cases), projecting some increases and some decreases in income, depending on the sector. The study itself was not published (and remains unpublished as of 25 January 2022), but the <a href="#">executive summary</a> concludes that achieving the Green Deal objectives may lead to a reduction of livestock production of 10-15%. Like the CropLife commissioned WUR study, <a href="#">it did not include</a> ecological advantages of F2F. <a href="#">Commenting on the finding</a> that the F2F “could benefit the financial position of half of the livestock farmers”, one WUR researcher noted the “results may be more positive than they [Copa-Cogeca] expected.”</p>
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# ANNEX 2

## THE COMMISSION'S JOINT RESEARCH CENTRE (JRC) TECHNICAL REPORT: FINDINGS AND LIMITATIONS OF THE STUDY

### ***JRC technical report: 'Modelling environmental and climate ambition in the agricultural sector with the CAPRI model', August 2021***

The JRC study models how ambitious implementation of the Common Agricultural Policy (CAP) reform proposals could affect four targets in the Farm to Fork and Biodiversity strategies (namely, 50% pesticides reduction, 20% fertilisers reduction, 25% organic agriculture, 10% high-diversity landscape features). It found that the targets achieve “significant environmental benefits” in terms of reductions in greenhouse gases, ammonia emissions and gross nutrient surplus, but predicted a “decline in EU production and variations in prices and income for selected agricultural products” – ***estimated at 5-15% across all sectors, with livestock hit the hardest***. It also suggested that a significant amount of emissions gains could be “leaked” to other world regions<sup>14</sup>, but added that this projection follows from the model’s assumption that the EU acts alone. In other words, the carbon leakage is an overestimate, as it doesn’t incorporate global climate commitments.

The ***JRC has emphasised the many limitations of its study***, which, for example, assumes the yield gap between organic and conventional farming remains the same, even though promoting organic farming is likely to increase its yield and reduce this gap. For example, the yield gap is substantially reduced and in some cases disappears when you look at the 25% best performing organic farms in Europe.

The JRC’s model also does not account for reducing demand via actions on food waste and shifting to more plant based diets (which would counterbalance the projected decrease in yields: as ***WWF notes***, one-fifth of EU food goes to waste and two-thirds of EU cereal production is used for animal feed, so this trade-off could be easily absorbed).

Nor does the JRC model capture all the benefits from the targets (eg positive synergies for agriculture from a better environment, health benefits from reduced agricultural emissions, which could save 16,000 premature deaths/year in Europe, etc). For all these reasons, the ***JRC explained*** that it is working to improve the knowledge of the co-benefits and to develop better models, whilst pointing out that upcoming proposals for legislative frameworks will be subject to a “comprehensive impact assessment”.

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<sup>14</sup> This means that the EU’s green policies would cause a part of production shift to parts of the world that do not demand the same standards, therefore increasing emissions there.



# ANNEX 3

## A SNAPSHOT OF SOME OF THE MEMBER STATES RESISTING A BETTER SUSTAINABLE USE DIRECTIVE (SUD)

### MEMBER STATE

### HOW DID THEY PUSH AGAINST AN EFFECTIVE/AMBITIOUS SUD ACCORDING TO DOCUMENTS RELEASED BY THE COMMISSION?

### HOW'S THEIR PROGRESS ON PESTICIDE REDUCTION/ INTEGRATED PEST MANAGEMENT (IPM), ACCORDING TO THE COMMISSION<sup>15</sup>

#### FINLAND

Against legally binding targets, and questioned the scientific evidence for targets and claiming climate change will increase the need for plant protection products (PPPs) – ie pesticides – even though PPP-heavy industrial monoculture cropping is actually most vulnerable to plant diseases. Against more IPM-record keeping (arguing for more training rather than more administrative burden), against higher taxes or prescriptions for pesticides (claiming the risk of illegal use will grow if legal use is made too difficult), but argued for “genetic tools as alternatives”, and for less stringent testing for some pesticide application equipment (PAE). Argued that despite “political pressure on decreasing the use of PPPs, the efficiency of different measures should be verifiable and verified before taken on board.” Doesn't want PPPs used in forestry to be included in Harmonised Risk Indicator 1.

Finland failed to transpose the SUD's Harmonised Risk Indicators (HRIs) – which measure pesticide risk and use (HRI1) and use of most hazardous pesticides ie candidates for substitution (HRI2) – into national law as the SUD requires. Finland has seen a significant increase in the overall use of pesticides, due to the use of urea in forests (HRI1 increased by 44%).

#### NETHERLANDS

Questioned the need for more stringent EU harmonized regulations, claiming that “the current SUD provides sufficient tools for the sustainable use of pesticides”. Complained that the F2F targets “give a negative perception of pesticides” by focusing on reduction of use and risk, and should instead be positive by focusing on an increased use of low-risk substances. Raised numerous issues in discussions on how the F2F targets fit into Member States' CAP strategic plans, complaining that candidates for substitution in HRI2 are a “changing target” given “future developments” in their approval. Asked “what would happen if a Member State refused to put a national target in their CAP strategic plan”.

The Netherlands has one of the highest sales of PPPs per hectare in the EU. Its SUD National Action Plan (NAP) was not ‘substantially’ revised (in accordance with SUD rules), IPM not sufficiently enforced, and growers continue to rely on chemical pest control methods. The “intensification of agricultural production” identified as the “main threat” to biodiversity in the Netherlands.

<sup>15</sup> Based on DG Agri's draft recommendations for MS CAP Strategic Plans, which were also released under FOI law.

## IRELAND

Ireland has “always taken a position against quantitative use reduction targets” which are “a blunt tool”; also against higher taxes, prescriptions, and better IPM record-keeping. Disagreed with DG Sante that a majority of member states support extended IPM record-keeping. Argued that meeting the F2F and Biodiversity strategy targets isn’t possible without food production shortages. Expressed concerns over impacts that measures to achieve the pesticide reduction targets might have on livestock farming.

Ireland’s SUD NAP has serious weaknesses in its control system for IPM implementation and inspection of pesticide application equipment.

## GERMANY

Prior to the change in government, Germany argued that member states are making progress on IPM and sees no “need to change SUD in this area”. Disagreed with DG Sante that a majority of member states support extended IPM record-keeping, and argued against Advisory Services becoming an obligation for growers, saying they should be “available, but not obligatory.” Regarding links between the CAP and F2F, Germany suggested the “favourable opinion of stakeholders” as a criteria to use to prioritise needs relating to the efficient management of natural resources (water, air, soil).

Germany’s agricultural production pattern is very dependent on pesticides, emergency approvals (HRI2) are not decreasing and are dominated by the most toxic candidates for substitution. Effective controls on IPM implementation still lacking.