

Dear Sir/Madam,

European farmers and agri-cooperatives strongly oppose the unilateral French ban on plant protection products containing one or more neonicotinoid active substances and the use of seeds treated with these products.

From a regulatory point of view, the current notification 2017/0039/F clearly contradicts the purpose of the Regulation 1107/2009 and the provisions for the review of approval of active substances (articles 1.3 and 21). Moreover, provisions allowing Member States to withdraw an authorisation or taking emergency measures (articles 44 and 69) are not met.

Moreover, the explanatory statements contain very vague references to harmful effects and do not distinguish among the different profiles and uses of the active substances and the risk mitigation measures already in place. References to possible alternatives are not substantiated and do not seem correct, in light of the current difficulties to treat oilseed rape in several Member States.

Indeed, a large part of food production relies on pollination in order to preserve crop productivity, crop diversity and ensure quality of production. In addition, bees and pollinators play also an important role in biodiversity. For these reasons, European farmers recognise the importance of maintaining and creating suitable conditions in Europe to protect bees and pollinators for the benefit of European agriculture.

Therefore, there is a recent interest to understand bee mortality, which in fact, is a multifactorial issue. Parasites, viruses, diseases, variable weather conditions or climate change are some of the causes behind.

The vast majority of pests and diseases are controlled with agricultural practices such as crop rotation, seed and variety selection, cultivation practices, sowing dates and densities, irrigation, etc. However, plant protection products (including neonicotinoids) are still an important tool in farmers' toolboxes to control pests and diseases.

We strongly believe that without proper tools on the market (mechanical, chemical or biological) which complement existing Integrated Pest Management, European farmers cannot deliver on their commitments, seriously endangering the capacity of EU agriculture to respond to the EU's priorities such as jobs and growth and to ensure safety standards and meet global challenges.

In addition, we would like to highlight that despite the risk posed to bees, the number of beehives in Europe has constantly increased since 2004. This figure shows a clear inconsistency with the measures taken against these active substances.

Furthermore, the current EU ban on three neonicotinoids does have negative impact for EU farmers and agri-cooperatives. According to our estimations for oilseed rape and corn, the ban has produced a significant productivity gap between the winter and the spring crops and increased the production costs tremendously. Therefore, in some Member States, the cultivated area of these crops has decreased sharply.

In conclusion, we consider that this unilateral ban may create several disruptions in the Single Market, putting French farmers in a competitive disadvantage and creating a dangerous precedent for other Member States and active substances.

Therefore, Copa and Cogeca ask the European Commission to withdraw this draft decree.