



Brussels, 10 March 2014

Subject : Vote against the McIntyre report 2013/2100(INI) (A7-0048/2014) in Tuesday's plenary

Dear Member of the European Parliament,

Tomorrow, Tuesday 11 March 2014, you and your colleagues are going to vote on the McIntyre report on the future of Europe's horticulture sector – strategies for growth 2013/2100(INI) (A7-0048/2014).

The signatories of this letter, who represent farmers, food businesses, consumers, beekeepers and citizens promoting environmental protection, call on you to: **reject the McIntyre report in its entirety.**

This report creates an inaccurate picture of the challenges faced by our food and agricultural system. It simplistically advocates false solutions to producing more; instead of ways to produce better, safer and more sustainably. The main assumption underpinning the whole report is that Europe needs to further intensify and industrialise its agriculture system and specifically its horticulture sector. However, such a claim is not supported by any scientific nor economic facts. The report also contains statements which are aimed at undermining EU rules on health and the environment, and in particular EU laws on pesticides.

For voting on specific amendments, we recommend that you vote against (-) the following statements (see annex for more details) which will be used to attack recent EU laws and hinder the transition to sustainability:

Recital N: over-simplistic statement in favour of continued pesticide dependency.

§ 17: stops retailers from responding to consumer demands by setting their own food standards.

§ 20 and § 21: propose a watering-down of the recently approved EU Regulation 1107/2009 on the authorisation of pesticides, which is still in the implementation phase.

§ 22: calls for more research funding to be spent on minor uses of pesticides.

§ 24: challenges and weakens ongoing work on the definition of endocrine disrupting chemicals.

§ 25: challenges the ban on bee-killing neonicotinoid pesticides.

§ 27: misrepresents good agronomic practices as potentially damaging for the environment.

§ 32: promotes genetic engineering (GE) and calls for more EU research funding on GE crops.

§ 33: argues that cisgenesis (a GE technique) is a conventional plant breeding method.

The undersigned organisations argue that the way forward for European farming is to switch to sufficiency rather than overproduction and waste, to increase the delivery of ecosystem functions (instead of destroying the agricultural resource base), and to protect crops using agronomic prevention, non chemicals and using chemicals only as a last resort (in line with EU Directive 128/2009 on the sustainable use of pesticides). Real innovation means developing new non-chemical alternatives to pest management and using techniques that fully comply with health and environmental principles, and that are in line with what the public wants.

Since none of these essential issues are included in the McIntyre report we encourage you to vote against it in its entirety. Even if amended, such a report will remain heavily biased and misleading.

Yours sincerely,



François Veillerette
President of PAN Europe
On behalf of:

Francesco Panella, président of European Beekeeping Coordination (BeeLife)
Nina Holland, Corporate Europe Observatory (CEO)
Todor Ivanov, Secretary General of Eurocoop
Beate Koller, Arche Noah's Director
Joos Riss, Director Greenpeace EU Unit

Annex

Recital N states *'whereas the growing difficulties being experienced in connection with plant pest prevention, control and eradication and the limited availability of plant protection products for vegetable crops could have an adverse effect on agricultural diversity and vegetable quality in Europe'*

Voting recommendation : Vote against the entire paragraph

Why : The way forward for the European model of farming is to switch to increasing the delivery of ecosystem functions rather than destroying the agricultural resource base, and to protecting crops using prevention via agronomic and other non-chemical methods, where chemicals are only used as a last resort (in line with EU Directive 128/2009 on the sustainable use of pesticides).

§ 17 *'Takes the view that the private standards for pesticide residues that have been adopted by many large retail chains are anti-competitive and detrimental to the interests of F&V growers; calls on the Commission to put an end to such practices, given that the pesticide residue levels laid down in EU legislation provide adequate protection for the health of both consumers and producers;'*

Voting recommendation : Vote against the whole paragraph

Why : Those retailers, many of them consumer co-operatives, who have decided to establish specific standards going beyond the minimum legal standards have done so based on consumer demands for healthy and safe food that don't damage the environment. Competition doesn't have to be a race to the bottom. Retail chains should be free to respond to consumers' demands.

§ 20 *'Stresses that horticulture is reliant on a variety of plant protection products (PPPs), and urges the Commission to take a risk-based approach to the regulation of these products that is justified by peer-reviewed, independent, scientific evidence; emphasises that minor uses are particularly vulnerable owing to the scarcity of the relevant active substances; calls on the Commission to strengthen the co-ordination of data generation across the Member States, in particular residues data, ... ; calls on DG Agri, DG Sanco, DG Environment and DG Competition to work together strategically to take into account the impact of changes to PPP regulation from multiple perspectives;'*

Voting recommendation : vote against part in bold (split vote).

Why : this argument goes completely against the position that the European Parliament took while discussing and agreeing on the legal text of EU Regulation 1107/2009 on the authorisation of pesticides. This text also weakens the precautionary principle, and confirms pesticide dependency as an inevitability, which it is not.

§ 21 *'Urges the Commission to review the operation of the arrangements for mutual recognition of PPP authorisations laid down in Article 40 of Regulation (EC) No 1107/2009, with a view to streamlining their implementation and removing any unnecessary red tape, and consider the long-term goal of global harmonisation for regulating PPPs and reducing non-tariff trade barriers to export trade;'*

Voting recommendation : vote against the whole paragraph

Why : this argument goes completely against the position that the European Parliament took while discussing and agreeing on the legal text of EU Regulation 1107/2009 on the authorisation of pesticides. The text also weakens environmental protection.

§ 22 *‘Urges the Commission to submit, in accordance with Article 51(9) of Reg. 1107/2009 and without further delay, a report to Parliament and the Council on the establishment of a European fund for minor uses and specialty crops; stresses that such a fund should be used to finance an ongoing European work programme for coordination and cooperation between agri-food operators, competent authorities and stakeholders, including research bodies, on carrying out and, where appropriate, funding research and innovation work geared to protecting specialty crops and minor uses;’*

Voting recommendation : deletion of text in bold (split vote)

Why: The text calls for even more EU research money being siphoned off to increase chemical dependency rather than looking for truly sustainable alternatives, with the overall aim of reinstating otherwise prohibited active substances.

§ 24 *‘Recalls that both the Plant Protection Products Regulation (Reg. 1107/2009 of 21 October 2009⁽¹⁾) and the new Biocides Regulation (Reg. 528/2012 of 22 May 2012⁽¹²⁾) require the Commission to specify scientific criteria for the determination of endocrine-disrupting properties by December 2013; is concerned that these criteria will remove significant substances which could still be used with acceptable risk; emphasises how important it is that the procedure should be transparent, so that the market actors concerned understand the scientific basis for the decisions and are aware of the actors who were involved in developing new criteria; urges the Commission to fully consider the impact of different approaches when presenting proposals for endocrine disruptors;’*

Voting recommendation : deletion of text in bold (split vote)

Why: This argument not only questions the work that the European Parliament has done so far on Reg. 1107/2009 on the authorisation of pesticides, including the Report of the Protection of public health from endocrine disruptors¹ but calls for watering down the pesticide approvals’ mechanism that we have in the EU: "acceptable risk" is subjective and undermines the precautionary principle which is also being attacked in the context of the EU-US trade negotiations, in order to ease pesticide safety rules. Further delaying the definition of Endocrine Disrupting Chemicals will hold back innovation on new non-chemical alternatives and use of alternative techniques.

§ 25 *‘Calls on the Commission to reassess the current restrictions on the use of some neonicotinoids and consistently examine any new scientific evidence in this field; urges also the Commission to assess properly the environmental impact of any restrictions pertaining to location, type and time of use before bringing them into force, and give due consideration to any economic impact;’*

Voting recommendation : Vote against the whole paragraph

Why: This text goes against the European Parliament resolutions on bee health². It also implies that the evidence gathered by European Food Safety Authority to justify a ban was not independent, peer-reviewed science, which is wrong. The costs of lost pollination far outweigh the immediate economic costs of withdrawing these highly toxic bee-killing compounds.

§ 27 *‘Highlights ... ; stresses that plant cultivation methods, such as crop rotation and the*

¹ <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+REPORT+A7-20130027+0+DOC+XML+V0//EN&language=en>; ref: [2012/2066\(INI\)](#)

² 2011 : [http://www.europarl.europa.eu/oeil/popups/ficheprocedure.do?lang=en&reference=2011/2108\(INI\)](http://www.europarl.europa.eu/oeil/popups/ficheprocedure.do?lang=en&reference=2011/2108(INI))
ref: 2011/2108(INI)

2010 : <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P7-TA-2010-0440+0+DOC+XML+V0//EN&language=EN> ; ref: P7_TA(2010)0440

planting of catch crops and the use of traditional and new varieties of crops, as well as research and development, should be geared to minimising environmental damage;'

Voting recommendation : vote against the part in bold (split vote)

Why: The text does not make sense and misrepresents good agronomic practices, which in reality are crucial to reducing chemical dependency.

§ 32 *'Urges the Commission to prioritise horticultural crops for funding and research using new and innovative plant breeding techniques (NBTs), provide clarity about the regulatory status of plants produced using these techniques and ensure that any NBTs that are found not to lead to GMOs will be treated like conventional breeding techniques, and will therefore not be subject to any process-based pre-market authorisation procedures;'*

Voting recommendation : vote against the whole paragraph

Why: No more research funds should be siphoned off to genetic engineering (GE), including "NBTs", at the expense of research into sustainable cropping systems and varieties.

§ 33 *'Calls on the Commission to differentiate between cisgenic and transgenic plants and to create a different approvals process for cisgenic plants so as to recognise that cisgenesis is an accelerated form of conventional plant breeding; awaits the EFSA opinion demanded by DG Sanco evaluating the findings of the working group of new biotech breeding techniques'*

Voting recommendation : vote against the whole paragraph

Why: GMOs raise concerns regarding food and environmental safety because the process of introduction of heritable genetic material into a plant's genome can give rise to unexpected and unintended effects. Any technique which, like Cisgenesis, introduces such material should be classified and assessed as genetically modified regardless of where the gene originates from. Cisgenesis uses the same genetic engineering method used in current commercial GM crops, and therefore the same concerns apply.