



AREFLH contribution to the European Commission's Call for Evidence on the Food and feed safety – simplification omnibus

The Assembly of European Horticultural Regions (AREFLH) main missions are:

- to represent its 16 member regions and 30 Associations of Producer organisations and Producers Organisations, from 14 European countries.
- to defend the economic and social interests of the fruit, vegetable and horticultural (F&V) sectors in Europe.
- to foster exchanges of best practices, partnerships, and joint projects between regions and professional organisations.
- to actively seek innovative solutions for the key issues affecting the future of the fruit and vegetables production in Europe.

Introduction

A coherent and efficient EU framework for plant protection is essential to safeguard the integrity of the **Single Market** and ensure that European farmers operate on a level playing field. Today, divergent national rules and procedures on plant protection products (PPPs), and maximum residue levels (MRLs), are creating **barriers to trade, administrative inefficiencies, and unequal access to innovation**. These discrepancies not only distort competition but also slow down the deployment of new and safer crop protection solutions across the Union. This situation is particularly critical for “minor crops,” where limited availability of authorised products exacerbates disparities between Member States and hinders effective crop protection.

EU producers need a strong and harmonised approach at EU level to ensure that authorisation, market access, and control procedures remain **proportionate and aligned** with the principles of the Common Agricultural Policy (CAP). Farmers must have access to a balanced toolbox of solutions—including both **chemical and biological products**—to manage pests effectively while maintaining high environmental and safety standards. Innovation, flexibility, and regulatory coherence should guide this evolution.

Harmonising the national Plant Protection Products frameworks

Farmers operating under similar agronomic conditions across Europe often face unequal access to crop protection tools, leading to competitive imbalances and inefficiencies. A more coherent and coordinated EU approach is therefore essential to **ensure a level playing field** and promote innovation in sustainable pest management.

The resources available for the authorisation of PPPs should be increased and used more efficiently. Currently, most of the resources invested by Member States and companies are devoted to renewing already authorised active substances under Regulation (EC) No 1107/2009. We propose to amend this Regulation so that only those active substances for which a specific problem has been identified, or for which new scientific evidence requires a review, would undergo renewal. Moreover, **only the relevant aspects** of such substances should be reassessed. This targeted approach would free up significant resources for both Member States and PPP holders, enabling faster authorisation and encouraging the development of new tools to address farmers' plant protection challenges.

Building on this, market access for PPPs can be further improved by simplifying and **accelerating mutual recognition procedures** across the EU. Amendments to Regulation (EC) No 1107/2009 and related European guidelines should guarantee that applications under mutual recognition are processed more swiftly and transparently. Moreover, mutual recognition between different geographical zones should be possible whenever agronomic and cultivation conditions are equivalent. To strengthen support for minor uses, it is also important to broaden the range of PPPs available for specific crops and specialised production systems, enabling farmers to sustain both competitiveness and environmental sustainability.

Finally, innovation in pest management technologies—particularly using **drones**—can play a key role in improving efficiency and environmental safety. Drones enable more precise and rational use of PPPs, especially in difficult terrains such as mountainous areas or in emergency situations like floods, where conventional machinery cannot operate. Under current EU law, drone application is classified as **aerial application** and regulated by Directive 2009/128/EC, requiring prior authorisation and strict control by competent authorities. However, studies show that drift levels from drone applications are comparable to ground spraying, indicating that the current framework is outdated. We therefore propose to **remove the specific authorisation requirement for aerial applications** using drones and to eliminate the need for additional strict controls, maintaining only the general verification procedures applied to PPP use. Products already authorised for terrestrial application should be permitted for drone use, or alternatively, rapid evaluation guidelines should be developed to enable their authorisation for drone application.

Updating the MRLs

When a new Maximum Residue Level (MRL) is established, or an existing one is reduced, it is essential to grant sufficient transitional periods for operators to adapt to the new limits. These periods must consider the seasonality of each fruit and vegetable crop, as well as the timing of phytosanitary treatments.

Under Article 50 of Regulation (EC) No 365/2009, the chapters concerning procedures for applications, MRLs applicable to products of plant and animal origin, and official controls, reports, and sanctions enter into force six months after the publication of the last of the related Regulations. However, for certain crops, this six-month delay is insufficient to adapt to the updated limits while maintaining the marketability of products already in stock. Therefore, this transitional period should be extended to **at least two years** to ensure a realistic and fair adaptation timeline for producers.

Clear and timely guidance must also be provided to prevent misunderstandings, which frequently occur—particularly in the **case of exports** of fruit and vegetables treated with plant protection products affected by new MRLs.

Furthermore, challenges arise from the coexistence of two separate and independent procedures: the authorisation of active substances and the setting of MRLs. This can create confusion, for instance, when an active substance is no longer authorised at EU level, but its corresponding MRL remains in place and continues to be reviewed. Maintaining MRLs on prohibited substances is a problem in the case of requests for emergency use when those limits are too low.

Supporting the introduction of Biopesticides

Biocontrol products are classified as **low-risk** and, due to their toxicological characteristics or mode of action, are often **exempt from Maximum Residue Level (MRL)** requirements. Many, such as pheromones, are not directly applied to crops and therefore pose minimal risk to human health or the environment. Moreover, these products are frequently designed to address **crop protection challenges specific to the Mediterranean region** or to **minor crops**. Because these markets are smaller and less profitable, lengthy, and costly registration processes discourage producers from investing in authorisation, limiting the availability of such products.

Access to innovative biocontrol solutions must be accelerated to provide farmers with sustainable and effective alternatives to conventional plant protection products (PPPs). The authorisation of biocontrol

products—typically pheromones or **products of biological origin**—should follow a **simplified, faster, and less costly procedure** than that applied to conventional chemical PPPs. This differentiation is justified by the specific nature and risk profile of these products.

Biocontrol techniques can complement traditional chemical PPPs, particularly within the framework of **integrated production**, which has been widely implemented in many European regions and should be further developed through labelling and promotion. This approach prioritises agronomic and biological methods, allowing chemical interventions only when strictly necessary. In this context, **biocidal products** can serve as an additional tool, especially for preventive purposes or in cases where rapid action is not immediately required. To enhance the resilience and sustainability of pest management strategies, it is essential to broaden the range of available tools by promoting biocontrol as a **supplement to chemical solutions**. This alternation of modes of action can help reduce the development of pesticide resistance and contribute to long-term crop protection effectiveness.

While biocontrol methods offer significant environmental benefits, they can sometimes be **less effective** than traditional chemical treatments. They may be more sensitive to external factors such as weather conditions, take longer to achieve satisfactory control levels, or be less resistant to washout. Conversely, **chemical PPPs remain more reliable for immediate and severe pest outbreaks**, allowing farmers to intervene swiftly and safely when needed. Given that agriculture is a **strategic but economically fragile sector**, farmers must be equipped with both chemical and biological tools to ensure productivity and food security while advancing toward sustainability goals.

Conclusions

Simplifying and harmonising regulatory processes—while ensuring robust safety standards—is the only way to guarantee fair access to effective tools across all Member States. A coherent framework should also ensure that authorised alternatives are genuinely effective and practical for farmers, maintaining both productivity and affordability.

In this context, **biocontrol products should be recognised as a valuable complement, not a replacement, to conventional plant protection products**. Their targeted and environmentally friendly nature can support integrated pest management, reduce resistance, and contribute to sustainability goals. However, they cannot yet fully match the reliability and immediacy of chemical solutions, which remain essential for managing severe or emergency pest outbreaks. Farmers therefore need access to both categories of tools to maintain productivity, food security, and competitiveness.

A balanced, innovation-friendly, and harmonised regulatory framework—supported by **efficient authorisation procedures**—will reinforce the EU's capacity to protect crops, consumers, and the environment, while preserving the **unity and fairness of the Single Market**.