



Miroslav Toman
Minister of Agriculture of the Czech Republic

Prague, June 25, 2020
Ref. No 29146/2020-MZE-17111

Dear Madam Commissioner,

Thank you for your letter summing up the challenges ensuing from the Farm to Fork Strategy of the European Commission. I would like to assure you that quality and safe food are my priority as well. I fully support sustainable food chain and sustainable food production, protection of soil, water and air. Numerous actions have already been taken to this end by the Czech Republic.

Compared to the non-EU countries, the EU has done a lot, food production in the EU already now meets the most stringent requirements regarding food safety or environmental protection in the world and the European foodstuffs are mostly produced in a sustainable manner. The European Union has in recent years considerably cut down the portfolio of active substances allowed in plant protection, and now already the farmers in their farming activities face difficulties associated with inadequate possibilities of plant protection.

The systematic EU approach to sustainable farming is something I consider crucial. Nonetheless, I believe that the objectives set out by the Commission in the Farm to Fork Strategy are very ambitious and hardly achievable. These objectives will have an effect on the functioning of the European agriculture and food industry for a few decades to come. I am convinced that such requirements of major importance that will have to be met by individual Member States cannot be set out by the European Commission alone, with no thorough analysis of potential impacts on the whole agri-food sector of the EU. The Member States must be much more involved in the discussion on the objectives of the strategy, particularly at the level of the Council of the EU, and a broad consensus shall be achieved at the EU level before the ambitions of the European Commission are translated into practice. Any binding objectives should be defined by the Council of the EU and the European Parliament in the EU legislation. Also, when setting the objectives, the specifics of the individual Member States must be taken into account as well as the efforts exerted by them so far in order to protect the environment and to achieve sustainable use of natural resources. It is also necessary that the particular situation in the given Member State is considered to avoid any decrease in competitiveness of its agricultural sector. The fact that some of the Member States, and the Czech Republic ranks definitely among them, have already very stringent criteria of environmental protection in place has to be taken into consideration. As an example, let me refer to the use of pesticides. According to the data of the Statistical Office of the EU (Eurostat), the pesticides sales dropped in the Czech Republic by 27 percent between 2011 and 2018. On the contrary, they increased considerably in a number of countries, including the neighbouring countries of the Czech Republic.

In the Czech Republic, farmers do not apply pesticides without a reason, but to eliminate pests and diseases that could affect the volume as well as the quality and safety of agricultural production and subsequently also food. I am afraid that the set-out objectives may ultimately jeopardize the competitiveness of the European agriculture instead of ensuring a robust and resilient food system resistant to all unexpected situations.

Another area, in which a notable progress has been achieved in the Czech Republic, is the use of antimicrobials and reduction in antimicrobial resistance. It is my pleasure to note that in the period from 2008 to 2018 the consumption of antimicrobials in farm animals in the sector of agriculture of the Czech Republic was successfully reduced by 50%. This achievement was made by the Czech Republic only thanks to long-term cooperation of agriculture and healthcare sectors based on the "One Health" principle, efforts of numerous stakeholders and huge amounts of funds spent.

As for your major concerns regarding the enforcement of the use of pesticides and animal welfare regulations, I would very much like to discuss these issues with you. I can also assure you that the Czech Republic has always sought to proceed in line with the EU legislation and that the Czech Republic ranks among the countries with the lowest pesticide consumption and the highest standards of animal welfare. Sustainable use of pesticides as well as the above-standard level of animal welfare have been supported in the Czech Republic under the Rural Development Programme for many years already.

As for the implementation of the European legislation on integrated plant protection, the Directive of the EP and of the Council on the sustainable use of pesticides of 2009 has been implemented in the legislation of the Czech Republic through the Act on Phytosanitary Care and its implementing regulations, especially the Decree on general principles of integrated plant protection of 2012.

The optimization of the use of plant protection products has been consistently achieved in the Czech Republic, with minimum impacts on the scope of agricultural production, which was also confirmed by the Eurostat report referred to above. There was a year-on-year reduction by 9% in the use of pesticides, and by as much as 25% in the use of glyphosate, the most commonly used herbicide. Moreover, in some crops the application of glyphosate before the harvest is prohibited.

As for the animal welfare and requirements for no tail docking on suckling piglets, I can assure you that the Czech Republic has recently adopted a number of measures in order to promote the fulfilment of this requirement. Bearing in mind the Commission recommendations, the Czech Republic has drafted the Action Plan to prevent tail biting and to stop routine tail docking of piglets in the Czech Republic.

Let me also assure you that the Czech Republic has been intensively addressing the matters of animal transport. We are fully aware of issues associated with long-lasting transport into the third countries and we do adopt measures to address them.

In summer seasons of the last years when temperatures reached their peak, closer attention was paid to the compliance with the standards applicable to animal transport in accordance with Council Regulation No 1/2005 on the protection of animals during transport and related operations, the compliance with the maximum temperature limit during transport, in particular. In the period when it was obvious that the set-out temperature limits can hardly be maintained throughout the journey, the Ministry of Agriculture in collaboration with the State Veterinary Administration temporarily prohibited the transporters from transporting animals.

The Council Regulation on the protection of animals during transport aims to protect the animals against unnecessary suffering and distress by setting out specific conditions. This legislation and especially its tools (sending back and checking the documents) is applicable to the EU territory only, therefore it is unrealistic to demand that all requirements are met as

far as the place of destination in the third country. In order to ensure a harmonised application of animal transport rules it is necessary to address these matters at the EU level and especially when negotiating the conditions with the third countries with a limited scope of application of the EU regulations. In this context, let me remind you that it is the European Commission that negotiates the conditions with the third countries.

In conclusion, let me assure you once again that the Czech Republic takes the environmental protection and animal welfare very seriously. As I mentioned above, steps have been consistently taken by us to improve the situation. Thus, I am fully available for discussions on the accomplishment of objectives of the Farm to Fork Strategy and I would very much like to meet you during one of my autumn business trips to Brussels so that I could introduce you to the situation in the Czech Republic in more detail and we could discuss appropriate solutions to the current challenges. I would appreciate if our teams stay in a close touch and cooperate in creating the best possible conditions for European food consumers and producers.

Yours sincerely,

Mrs.
Stella Kyriakides
Commission for Health and Food Safety
European Commission
Rue de la Loi, 200

A) Plant Protection Products:

Supervision over the compliance with the integrated plant protection provisions is based on the Act on Phytosanitary Care. Integrated plant protection elements related to proper application of plant protection products, including keeping the records of the data on the use, evaluation of the success rate of implemented plant protection measures and information on the occurrence of harmful organisms in relation to the identification of the target harmful organism are supervised through official controls. Supervision over the compliance with the general principles of the integrated plant protection is also done, just as in many other Member States, through a survey on a selected sample of farmers. Every year, the results of the survey are subsequently included in the annual report which evaluates the compliance with the integrated plant protection principles in the Czech Republic. Currently, the form used for this survey is being amended. The purpose of this amendment is to obtain more comprehensive information on the current situation in agricultural primary production and to set the extent to which the integrated plant protection principles are applied. The official controls of professional users focus on the use of authorised plant protection products, their application in line with the label and to allowed crops. Controls of record keeping of used substances as well as random controls during the application to stands, especially in bloom, such as rapeseed. In accordance with the Act on Phytosanitary Care, official controls of professional users include also the obligation to evaluate the success rate of implemented plant protection measures, to keep the records of the used products, including the identification of the target harmful organism.

B) Animal Welfare:

As far as animal welfare and the requirements for no tail docking of suckling piglets, I can assure you that the Czech Republic has recently adopted a number of measures to increase the fulfilment of this requirement. Bearing in mind the Commission recommendations, the Czech Republic has drafted the Action Plan to prevent tail biting and to stop routine tail-docking of piglets in the Czech Republic. In addition, the Czech Republic has elaborated methodology for the assessment of compliance criteria in line with the Commission recommendations. The methodology contains requirements for assessing the risk factors in tail biting and gives some welfare indicators oriented both at animals and resources. The methodology has been circulated among pig farmers. Currently, detailed methodological procedures are being elaborated that will be used by the inspection body for uniform assessment of the fulfilment of this statutory requirement and subsequent imposition of an enforcement action in pig farms in order to prevent routine tail docking. In 2019, the requirement to monitor the pigs with docked tails and tail injuries at slaughterhouses was newly introduced with the aim to use the data for further steps, e.g. selection of farms at a higher risk for controls. The Directive sets out the requirement for the process of continuous improvement to eliminate or reduce the risk of tail biting so that pigs with intact tails can be raised. It shall be highlighted, however, that this is closely linked to the used technology and active involvement of breeders, which shall be taken into consideration in the context of ensuring sustainability or competitiveness of the farm. It will be appropriate to assess the impacts of not docking the tails using the selected measurable criteria such as health status of pigs in pig farms, necessity of increased administration of antibiotics, number of deaths, pathological and anatomical findings, including injuries identified at slaughterhouses, etc.

Animal welfare during transport: The Czech Republic has also introduced a system of retrospective controls, under which transporters must send a copy of the journey log and temperature records to the competent Regional Veterinary Administration no later than 30 days after the end of the journey. When it is found out that the temperature limits had been exceeded, or if the transporter fails to submit the required documents, a fine is imposed on

the transporter. In case of a transporter, in whom a similar transgression is identified repeatedly, the procedure on suspension of activities is commenced, or, if such a transporter is a foreign entity, the procedure on temporary prohibition of animal transport in the territory of the Czech Republic. The situation in transport of animals to Turkey is complicated both due to the involvement of many entities in various Member States and measures related to the disease status, logistics and facilities at the border crossing and behind it. The decision of the European Court of Justice of 2015 on protection of animal during transport clearly indicates that the responsibility for meeting the set-out conditions throughout the journey is fully borne by the transporter.

C) Antimicrobials and antimicrobial resistance

At present, already the second National Action Plan to reduce antimicrobial resistance is implemented in the Czech Republic, designed based on the “One Health” principles. From the perspective of the Czech Republic – and one can assume that also from the perspective of other Member States in which the consumption of antimicrobials was dramatically reduced in the last decade – further reduction of the use of antimicrobials by additional 50% in agriculture by 2030 can hardly be achieved. This parameter will have to be substantially revised, especially since in the Member States such as the Czech Republic additional dramatical decrease might jeopardize the animal health and welfare. When considering the use of antimicrobials, also the availability of veterinary medicinal products shall be taken into account. The Member States must be provided with adequate space and powers to be able to address the availability of medicinal products with respect to their specific conditions. The EU should also adopt necessary measures to reduce the dependency in the development and production of veterinary medicinal products on regions outside Europe. Finally, the ambitious goals regarding the reduced use of antimicrobials in veterinary medicine and reduction of antimicrobial resistance in the EU can be achieved only provided the EU standards are strictly adhered to under all the existing as well as future business agreements with the third countries so as to ensure equal conditions for producers in the EU and in the third countries in all aspects. The EU shall also consistently promote the standards at international forums such as Codex Alimentarius (e.g. in the area of non-medically important antimicrobials and their use in animal husbandries intended for food production), the World Organisation for Animal Health or the World Trade Organisation.