

UNITING BEET GROWERS

since **CIBE** 1927

# SUGAR BEET, A STRATEGIC ASSET FOR EUROPE

CIBE MANIFESTO FOR 2024







**A SECTOR WITH AN IMPORTANT  
ECONOMIC WEIGHT IN THE EU**



**WORLD'S 3RD LARGEST SUGAR PRODUCER  
(15 MILLION TONNES OF SUGAR)**



**1.5 MILLION HECTARES  
WORLD'S 1ST BEET SUGAR PRODUCER**



**WORLD'S 2ND LARGEST SUGAR IMPORTER  
(~3 MILLION TONNES, 75% FROM  
DEVELOPING AND EMERGING COUNTRIES)**



**WORLD'S 2ND LARGEST SUGAR CONSUMER**



**WORLD'S 4TH LARGEST ETHANOL  
PRODUCER**

# OUR CONTRIBUTION TO CLIMATE AND ENVIRONMENTAL CHALLENGES

The sugar beet sector contributes to the EU's food sovereignty, decarbonisation, preservation of the environment and availability of bio-based products.

The European sugar beet sector is **fully circular**, valorising all products and material side streams along the entire process. From common household white sugar to high-tech products, the sector is active in the **development of a wide range of products**, all derived from sugar beet, for food and/or non-food use. These include **food ingredients, animal feed, green chemistry products (replacing petroleum-based materials) and renewable energy such as ethanol and biogas**. Other products, such as sugar factory lime, soil and stones, serve as value-added inputs for the agriculture, construction, chemical and pharmaceutical sectors. Sugar beet is the renewable biomass and the sugar factory is the integrated biorefinery. This closed-loop system from field to factory and vice versa shows that our sector is a key player in the transition from a fossil-based economy to a renewable bio-based economy, putting into practice the principles of the circular economy in line with the Europe 2020 Strategy and the Circular Economy Action Plan adopted in March 2020 as part of the Green Deal. The production of primary raw materials in the most sustainable, efficient and productive way will remain a key objective for the future, as will the development of the non-food potential of sugar beet, especially bioenergy.

The sector is characterised by a strong collaboration between beet growers and sugar manufacturers, which has enabled improvements in sustainability (economic, social and environmental) over the last decades. The **EU Beet Sugar Sustainability Partnership** (EU BSSP) is the sector's commitment to continuously improve its sustainability through the valorisation of good practices in environmental (soil health, biodiversity...) and social responsibility in beet growing and sugar production. It regularly highlights the sector's sustainability credentials and requires continuous development of farming practices and investment in R&D, new techniques, machinery and more expensive inputs to achieve carbon neutrality by 2050.

# GREEN TRANSITION AND STRATEGIC AUTONOMY

The EU sugar beet sector has undergone deep restructuring and successive crises over the past 18 years. This has led to a significant reduction in the number of EU sugar beet growers and the area under sugar beet, resulting in factory closures across Europe (20 closures between 2017/18 and 2023/24).

A major challenge for the sector today is to **reconcile the EU's environmental and trade policies with its strategic autonomy**. Sugar imports into the EU have increased significantly over the past decade as a result of the WTO sugar panel, continued concessions in Free Trade Agreements (FTAs) and, more recently, trade liberalisation with Ukraine, as well as the lack of market safety nets and risk management tools for EU beet sugar production. The opening of the EU sugar market to duty-free sugar imports has linked the European sugar market to the world sugar markets (raw and white) and their volatility, which is strongly influenced by a very small number of producing countries (Brazil, India and Thailand). This opening has forced a downward adjustment in EU sugar production, turned the EU into a net sugar importer and is now undermining the sustainability and resilience of the EU beet/sugar sector.

**Imported sugar enters the EU market without having to meet the EU's strict environmental and social sustainability standards.** This is unacceptable and unsustainable. EU sugar beet growers are struggling to maintain their productivity due to limited access to crop protection tools and innovation, as well as the adverse effects of climate change. Stricter EU standards implemented by sugar beet growers (in particular the shrinking toolbox to protect their crop) is making sugar beet farming more risky, more volatile, more costly and less competitive. The EU's sugar yield per hectare has fallen from a world-leading position to an average one. This loss of productivity has also led to a loss of EU influence at global level. Thus, **the EU's green transition for sugar beet and its sugar trade policy are currently not in line with the EU's strategic autonomy.** These policies should be urgently aligned. **Undermining the long-term sustainability of sugar beet and beet sugar production in Europe leads to increasing dependence on imports of less reliable, less sustainable and less traceable sugar from abroad.**



CIBE would like to remind the EU Institutions that the Strategic Dialogue on the Future of Agriculture in the EU should above all ensure that growers in the EU will be able to:

- continue to grow sugar beet and other crops efficiently and sustainably,
- further improve productivity and sustainability of their farms.

## 4

### KEY PRIORITIES

1. Maintain/improve the necessary means for agricultural production
2. Protect EU farmers from unfair competition and ensure a stable agricultural trade relation between Ukraine and the EU and long-term arrangements for a fruitful integration into the CAP
3. Ensure long-term market resilience (risk management tools)
4. Guarantee fair income for EU farmers



### IN THE LIGHT OF FARMER PROTEST MOVEMENTS ACROSS THE EU, CIBE STRONGLY RECOMMENDS:

- **A depolarisation of the debate.** EU institutions should listen to all farmers and consider their needs as a starting point for responses.
- Future policies should be designed in a coordinated way across EU Commission services, with **comprehensive impact assessments** and appropriate policy instruments to avoid administrative burdens.
- Future policies to be **science-driven**, based on evidence and robust cost-benefit analyses.
- Future policies should be **solution-based**. Restrictive regulatory frameworks that impose rules on farmers should be avoided. Policies should provide Member States and farmers with the flexibility to implement the most effective measures to achieve objectives, favouring incentives over penalties.
- An **appropriate and timely framework for innovation** to address climate and environmental concerns should be promoted.
- **more financial support for investment and establishment of young farmers.**

# I- MEANS FOR AGRICULTURAL PRODUCTION, COMPETITIVENESS & PRODUCTIVITY GAINS

To continue to meet the demand for food and improved environmental outcomes, productivity gains should remain a core focus, going hand in hand with the respect of ecosystems.

It is wrong to consider that we should move away from productivity gains, the resulting costs would be unsustainable. However, productivity gains in sugar beet in the EU have started, on average, to stagnate and even to decline, mainly due to the decrease in the means of production (notably effective crop protection tools). Although growers absolutely need a wide range of means of production, especially to help tackle the impacts of rapid climate change, the implementation of past regulations (e.g. Regulation (EC) 1107/2009) and the aims of recent proposals have pushed in the opposite direction.

A new “fourth agricultural revolution” (Agriculture 4.0) is developing, requiring huge investments in research, innovative and combined strategies, technical tools and approaches to tackle the challenges of climate change, sustainability (economic, social and environmental) and resilience.

The means of production required for Agriculture 4.0, such as new/better adapted crop varieties, new plant protection products (effective and affordable low-risk or bio-control solutions), precision farming tools, weeding robots, drones and digital monitoring tools are developing but, as far as sugar beet is concerned, at too slow a pace, with insufficient investments and too many restrictions compared to third countries. The main causes of this mismatch are inappropriate timing (tools are removed before effective alternatives are available) and the gap between farmers’ needs and EU policies. Another important issue is the level of flexibility the EU policy leaves for Member States and growers to work toward sustainability goals. EU legislation and/or its national implementation is often too strict, leaving growers empty handed to deal with local circumstances, changing weather conditions, different soil...





# 1. STOP DEPLETION OF THE CROP PROTECTION TOOLBOX

**NO BAN WITHOUT SOLUTIONS! NO REMOVAL UNTIL EFFECTIVE AND WORKABLE ALTERNATIVE TOOLS/SYSTEMS/PRACTICES ARE IN PLACE**

**SUGAR BEET GROWERS IN THE EU HAVE LOST MORE THAN 25 ACTIVE SUBSTANCES (AS) USED IN CROP PROTECTION PRODUCTS (PPPs) SINCE 2018.**

As this trend continues, further losses are expected in the coming years, with the expiry of authorisations for many AS contained in PPPs authorised for use in sugar beet cultivation. A strict and sometimes excessive interpretation of the precautionary principle, without consideration of timing, transition or effective alternatives, has driven growers into technical dead ends. In addition, the emergency authorisations (EAs) authorised by Regulation 1107/2009 and granted in the absence of effective replacement products or strategies are no longer possible for prohibited AS, such as for example the neonicotinoids (imidacloprid, clothianidin and thiamethoxam) used in seed treatments.

As a result, European beet growers are increasingly deprived of effective tools to protect sugar beet against harmful organisms (weeds, pests - such as aphids, moths, weevils and leafhoppers - and diseases - such as virus yellows, "low richness" syndrome (LRS), and rubbery taproot disease).

Managing resistance is also becoming difficult. The risk of crop failure (with yield reductions of up to 70%) is increasing. Such crop failure occurred in 2020 at national level in France, but also in Austria, following the 2018 ban on the use of neonicotinoids in coated beet seed.

Despite substantial investment by the industry and the untiring work of the sugar beet research institutes in Europe (tens of millions of euros), CIBE notes that so far, there are no effective alternatives, including combinations of agronomic levers/strategies, available to compensate for the disappearance of effective chemical PPPs .



## IN SUCH A CONTEXT, CIBE CALLS ON THE EU INSTITUTIONS:



to take an evidence-based approach to crop protection tools and seed innovations, rather than emotion/ideology-based reactions. Regulators need to speak up for science, data and oppose lies about conventional agriculture tools and lies that undermine public trust in EU farmers.



to avoid the strict ban of crop protection tools until alternative, affordable and effective tools are available. Farmers as well as developers/innovators of effective alternatives need regulatory stability to give them visibility. Otherwise, investment will dry up quickly.



to base IPM on feasible and realistic measures, particularly regarding the flexibility needed to implement IPM. CIBE points out that IPM is widely applied in beet growing in Europe and that growers have proven expertise in this area (see Commission report on Farmer's toolbox for IPM).



to further support funding for research and development of new methods and strategies to help farmers protect their crops effectively and sustainably and to support investment in new tools and equipment.



## 2. SUPPORT INVESTMENT IN DIGITALISATION AND PRECISION AGRICULTURE

Digitalisation, through incessantly adapted and improved monitoring tools and precision agriculture, is developing at a rapid pace to help growers adapt rapidly to climate change and to better respect the environment. However, this requires huge investments in new equipment (for example, a weeding robot costs over 80 000 €).

### CIBE CALLS :

- for growers to receive adequate financial support for investing in precision agriculture, for making the green transition and for adapting to climate change.
- for technical beet institutes to receive public financial support, including from EU Horizon Europe, for their research & development as well as for their advisory systems,
- for strong support in rural communities to make farming more resilient in the face of climate change (e.g., irrigation networks, flood mitigation measures...).





### 3. ADOPT A REGULATORY FRAMEWORK FOR NGTs

Adopt rapidly a favourable regulatory framework for the development of NGTs, favour research and innovation as well as science-based policies.

The development of improved beet varieties, tolerant to pests and/or diseases, while maintaining and even improving agronomic traits such as yield and quality, has always been a crucial factor for the survival of EU agriculture and for the improvement of productivity.



**CIBE SUPPORTS THE COMMISSION'S PROPOSAL ON NGTs AND CALLS ON THE EUROPEAN INSTITUTIONS TO AGREE ON THIS PROPOSAL SHORTLY AFTER THE EU GENERAL ELECTIONS.**

CIBE considers that the measures planned for NGT category 1 varieties (authorisation, marketing, labelling) should be identical to those for conventional varieties. This is essential to enable the development of NGTs crops without additional burdens and to avoid the EU falling further behind other regions. Such an enabling framework should avoid:

- any bias far removed from science-based considerations,
- any national opt-out by Member States, which would disrupt the EU Single Market.





## II. PROTECT EU FARMERS FROM UNFAIR COMPETITION

**NEW GEOPOLITICAL ISSUES ARE IMPACTING MARKETS NEGATIVELY. UNDERMINING THE LONG-TERM SUSTAINABILITY OF EU BEET SUGAR PRODUCTION IS LEADING TO INCREASED RELIANCE ON LESS RELIABLE, LESS SUSTAINABLE AND LESS TRACEABLE SUGAR IMPORTS. EU TRADE POLICY MUST BE CONSISTENT WITH THE GREEN DEAL.**

The Commission's double standard has led and is continuing to lead rapidly to the disappearance in the EU of many AS used to protect sugar beet. At the same time, this double standard turns a blind eye to massive imports of sugar produced from crops on which AS no longer authorised in the EU can be used. While there are currently measures in place to protect the health of European consumers (Maximum Residue Levels in imported products), there are no measures to protect the health of people or the environment in sugar producing and exporting third countries. Yet the environment, and indeed human health, are clearly global issues. In line with the objectives of its Green Deal and the Sustainable Development Goals (SDGs), the EU must play a key role in setting global standards. In its communication of 20 May 2020 on 'A Farm to Fork Strategy for a fair, healthy and environmentally friendly food system' the EU Commission had announced that 'the EU will support the global transition to sustainable agri-food systems'. So far, concrete results are poor (see list of authorized AS for sugar cane protection in Brazil, Australia, India).

Given the commitment of all major countries at the UN COP15 in Montreal in December 2022 to reduce the overall risks from PPPs and highly hazardous chemicals, **European beet growers call on governments and Institutions to harmonize their respective regulatory frameworks urgently and effectively. Banning at least the most hazardous PPPs should be consensual, applicable and effective for the protection of all, human health, biodiversity and the environment everywhere.**



## **“MIRROR MEASURES” ARE FEASIBLE AND URGENT**

We believe that sustainability objectives, in particular those concerning the reduction of use of production resources, must be consistent with trade policy (see for example the EU framework for imported organic products).

It is important to move towards defining mirror measures in European law to ensure that imported products comply with production standards that meet European requirements.

CIBE notes that:

- since 2018, third countries exporting products of animal origin to the EU should meet EU antibiotics requirements.
- since 2018, third countries exporting biofuels to the EU shall comply with the sustainability criteria defined in the EU Renewable Energy Directive (RED) and complete the RED technical process by the EU to be certified and get an EU RED certificate.
- since 2018, sustainability certification of sugar cane and cane sugar is progressing globally (but remains below 5% of the global sugar cane area).
- in 2020, the European Parliament adopted an amendment as part of the CAP review to enshrine the general principle of mirror measures.
- in June 2022, the European Commission recognised the value and feasibility of mirror measures, but left them to be implemented on a case-by-case basis.
- in 2022, 570 companies across the globe and active in the EU agreed that their suppliers for chicken comply with all EU animal welfare laws and regulations, regardless of the country of production.
- in February 2023, imports of products containing traces of 2 neonicotinoids (out of 4) banned in Europe were to be banned by 2026, for the first time due to the need to protect the environment.
- In May 2023, a regulation against imported deforestation was adopted: it will enter into force on 30 December 2024.
- in February 2024, a motion for a European resolution was tabled in the French Parliament by 70 MEPs from 7 different political groups to ask the French government to speed up the effective implementation of mirror measures when the new European cycle opens.



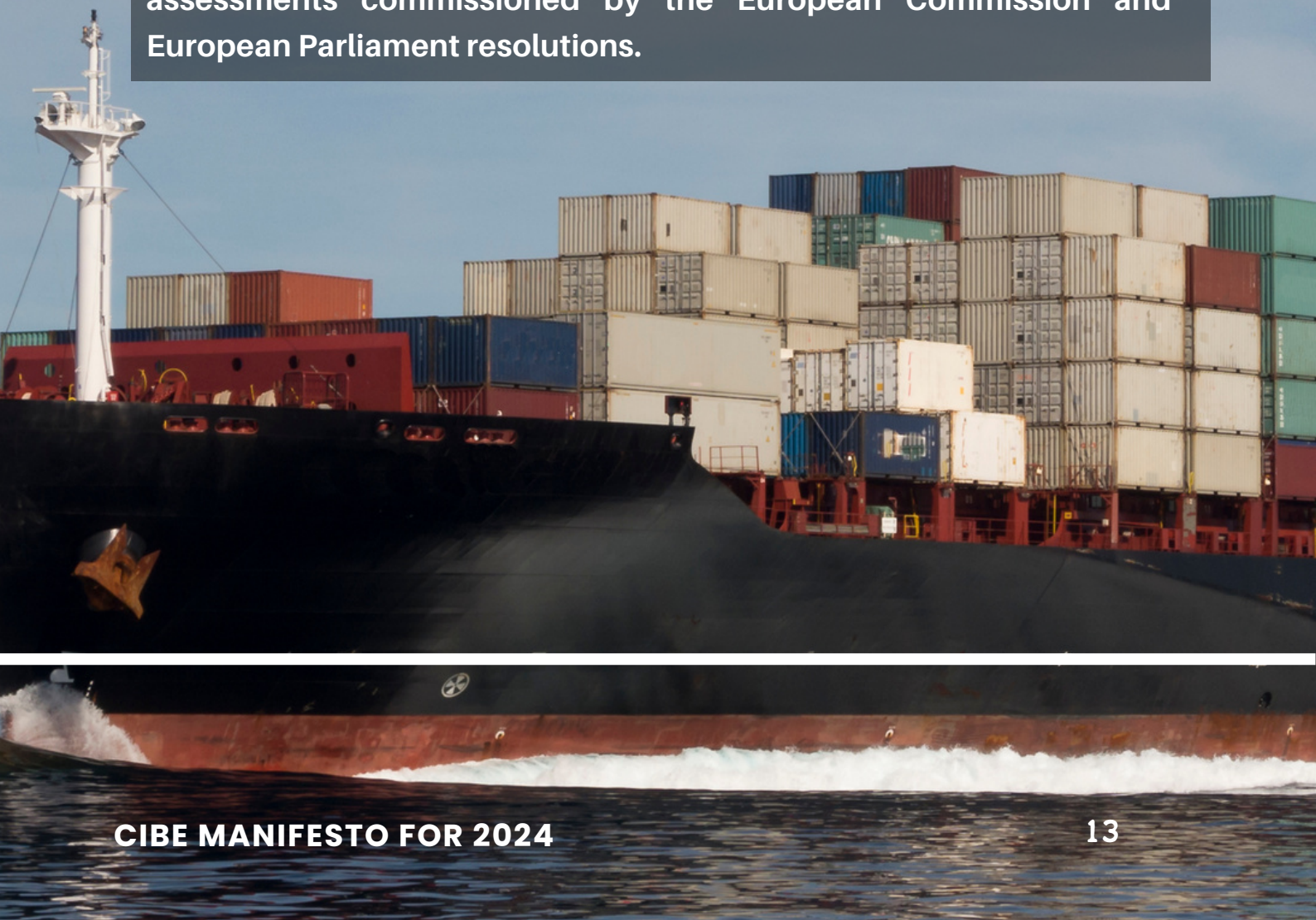
## CONSEQUENTLY, CIBE CALLS FOR FURTHER CONCRETE ACTIONS AND RESULTS:

- maintaining the EU's current import tariffs on sugar.
- an inventory of existing regulatory differences in production methods between the EU and its main trading partners (see CIBE analysis of ASs authorised in competing sugar-producing countries)
- addressing the risk of EU "production leakage" due to declining EU productivity. The gap between EU standards and those of competing sugar producing countries is becoming unsustainable for European growers and needs to be compensated.
- aligning the production standards of trade partners exporting sugar to the EU market by introducing "mirror clauses" to comply with European rules on the use of PPPs, particularly in the context of existing and future bilateral agreements.
- progress on the issue of possible control methods for mirror measures. The application of these standards would involve controls on agricultural production sites and agri-food chains in these countries, which do not have the same traceability tools (see for example the control methods applied to imported organic products).
- the inclusion of cane sugar in the list of relevant commodities concerned by the new EU Deforestation Regulation.
- applying the EU Regulation prohibiting in the EU market products made with forced labour as well as the Corporate Sustainability Due Diligence to trading partners and sugar exporters to the EU market.



- reversing the burden of proof for checking compliance with mirror measures when products enter the EU, based on the due diligence obligation. Where a mirror measure is provided for in European law, it should be up to the exporter to provide proof, by means of a certificate issued by a third-party body approved by the EU, that its products have been produced (or obtained from crops grown) under conditions that comply with European standards. This provision would lighten the burden on European and national control services, which would need to be considerably strengthened. European companies and their value chains (suppliers and subcontractors) should also be held accountable (e.g. due diligence approach adopted in the regulation on imported deforestation).

CIBE is opposed to further EU sugar market access concessions, in particular to Mercosur, Australia and India. This position is based on the fact that fair conditions of competition have not been established with these countries, as shown in various reports, sustainable impact assessments commissioned by the European Commission and European Parliament resolutions.



### **III- ENSURE STABLE AGRICULTURAL TRADE RELATIONS BETWEEN UKRAINE AND THE EU AND LONG-TERM ARRANGEMENTS FOR A GOOD INTEGRATION INTO THE EU CAP**

The amount of sugar imported by the EU from Ukraine rose from 20 070 t in 2021 (TRQ under the 2014 Association agreement) to 406 777 t (20 times the previous TRQ) in 2022/23 under the EU Ukraine ATMs Regulation (Regulation (EU) 2023/1077 of the European Parliament and of the Council of 31 May 2023 on temporary trade-liberalisation measures supplementing trade concessions originally applicable to Ukrainian agricultural products under the Association Agreement). This drastically increased EU import volume from Ukraine is expected to increase again significantly in 2023/24. Furthermore, “unstructured” and fraudulent sugar trade is also taking place, looking for quick and opportunistic profits and not respecting laws and taxation rules. This is damaging trade relations and requires urgent correction.

CIBE, together with Copa-Cogeca and 4 sectoral associations, representing sensitive products, including sugar, reaffirmed their solidarity vis-à-vis Ukraine and have called for constructive measures in the interest of both Ukraine and the EU. These measures include the introduction of import thresholds for sensitive products, such as sugar, and a system ensuring Ukrainian products reach a predetermined destination. CIBE welcomes the introduction of an automatic safeguard measure for sugar imports in the 2024 Ukraine ATMs Regulation on temporary trade-liberalisation measures supplementing trade concessions applicable to Ukrainian products as from 6 June 2024 and up to 5 June 2025. This regulation is understood to serve as a blueprint for the framework to be adopted after 5 June 2025.





It is also crucial that ahead of joining the EU, Ukraine's sugar beet production, and indeed its agriculture in general, adopts rapidly the EU phytosanitary standards, notably as regards crop protection and align on the EU acquis on that matter. Article 59 1 a, b and g on Objective of the 2014 Association agreement state that Ukraine should ensure full transparency as regards sanitary and phytosanitary measures applicable to trade; approximate its laws to those of the EU and improve communication and cooperation between the Parties on sanitary and phytosanitary measures. However, no time frame has been agreed on this matter.

## **IN THIS REGARD, CIBE CALLS FOR:**

- maintaining, as from June 2025 and during the pre-accession period, sugar as a sensitive product requiring an import threshold (quota/automatic safeguard clause) per marketing year at the level of average Ukrainian exports in 2021-2022-2023. This volume is around 10 times the previous TRQ included in the 2014 Association Agreement.
- aligning Ukraine with the EU acquis in the areas of food safety, plant health, integrated crop management and GMOs (NGTs as soon as the framework is adopted). The law on plant protection products in Ukraine must be brought into line with that of the EU as quickly as possible.
- introducing a licensing system as well as a system of predetermined destinations and for Ukraine to be integrated into the EU trade control and expert system (TRACES).



## IV- ENSURE LONG-TERM RESILIENCE AGAINST MARKET DISTURBANCES

The successive reforms and the 2017-2021 crisis in the EU sugar beet sector have clearly shown the need for better risk management measures. In 2019, the Report of the High-Level Group (HLG) on Sugar recommended that *"In the context of EU farmers being confronted in the future with a greater exposure to global markets and emerging new risks, the HLG urges all actors to strengthen the risk management tools in regions with insufficient risk management systems in place. It recommends to the European Commission to initiate a comprehensive review on possible strategies for improving the long-term market resilience of the EU sugar sector, including the use and effectiveness of risk management tools."* Another price shock like the one experienced between 2017/18 and 2020/21 would be unsustainable today.

Global sugar consumption continues to rise, and Brazil is reinforcing its absolute leadership as global supplier, followed by India and Thailand, making markets extremely dependent on their production. It should be noted that these countries have also unlocked the development of sugar cane for non-food outlets, such as biofuels and biobased products, making sugar cane a crucial crop in their agri-food strategy and strengthening their own resilience as sugar suppliers.

New geopolitical issues are also negatively influencing markets. In that regard, the CAP and an appropriate CAP budget (in line with EU policies and inflation) should ensure a good functioning of EU markets and a fair sharing of the value along the food chain.





## THEREFORE, CIBE CALLS FOR:



an efficient safety net (e.g. public intervention) and the review of the current sugar reference threshold, which remains unchanged since 2006 and no longer corresponds to the evolution of the production costs of EU sugar.



a comprehensive review on tools for improving resilience vis-à-vis sugar global markets, volatility and price collapse.



accessible risk management tools: recognizing the risk inherent to markets and giving farmers the security they need.



mitigating the risks related to climate change but also to low-carbon agriculture and environmentally friendly practices,



unlocking the potential of sugar beet for non-food outlets (biofuels, biogas, bioproducts) in the EU and correct the EU's inadequate and erratic policies (e.g. RED, ETD) which repeatedly prevent and limit such developments.



# V- GUARANTEE FAIR INCOME FOR FARMERS

## 1. Contractual framework

A properly functioning supply chain is indispensable for EU beet growers. Roughly half of the beet is grown and sold within cooperatives, the other half through private contract basis. The contract model in the EU beet sector is of key importance. The maintenance as from 1st October 2017 of compulsory interprofessional agreements and pre-sowing contracts negotiated on a regular basis between growers' associations and processors remains necessary, but is not sufficient. CIBE recalls that, to respond to market signals and adjusting their sown acreage accordingly, farmers require:

- balanced power in the negotiations of the terms of beet purchase and delivery conditions;
- removal of rigidity in beet delivery contracts between growers and sugar manufacturers and in sugar contracts between sugar manufacturers and sugar users;
- sufficient and appropriate market information and transparency (improvement in the reporting of prices, information regarding consumption dynamics in the EU);
- fairness in the valorisation of all their products: negotiated rewards in relation to the valorisation of beet pulp into bioenergy as well as in relation to the introduction of farming practices that allow the reduction of GHG emissions and the improvement of biodiversity.

CIBE considers that sugar beet contracts need to evolve further to better adapt to market developments and an increasingly challenging context.





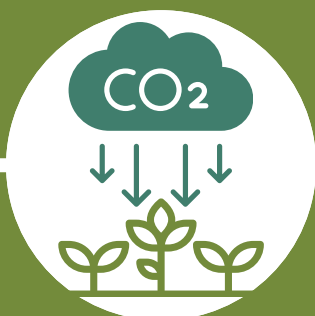
## 2. Development of low carbon agriculture, towards Net Zero by 2050

The improvement of environmental sustainability by farmers through low-carbon, environment- and biodiversity-friendly practices, is creating value that should not be dissipated downstream. It is crucial that farmers are rewarded for their efforts.

CIBE supports the development of low-carbon agriculture and the remuneration of farmers who apply it, notably through voluntary carbon markets. CIBE welcomes the agreement between the European Parliament and the Council on the first EU-wide voluntary framework for carbon removals, which will encourage the development of carbon removal technologies and sustainable carbon farming solutions. It also aims to create new income opportunities for farmers deploying innovative carbon farming practices.

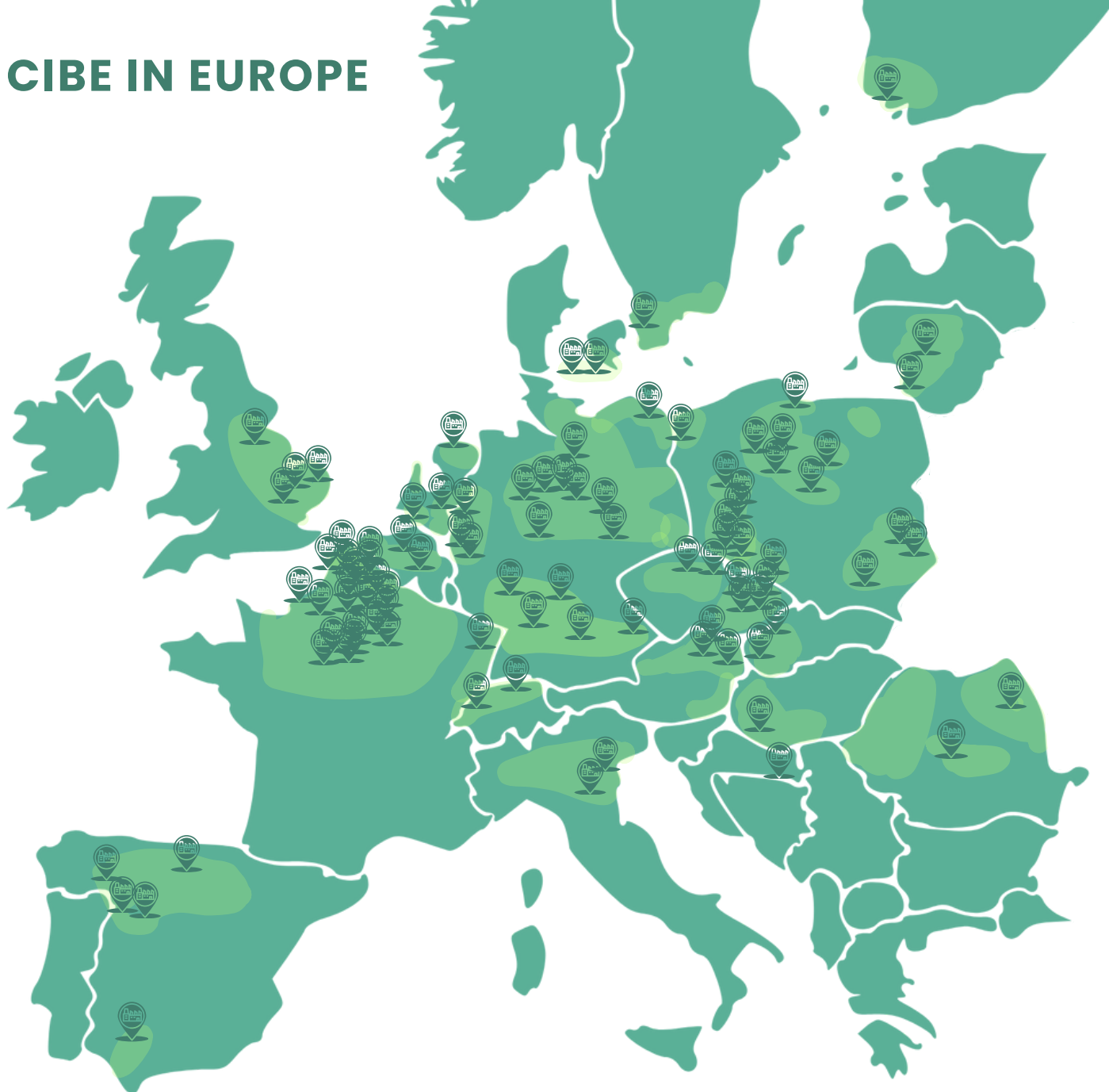
Downstream operators now require farmers to commit to carbon farming practices in exchange for some contractual compensation. CIBE stresses that in order to valorise their innovative practices, growers need to be actively involved in the management / coordination of this valorisation, including in the collective management of their data in order to be able to add value to their innovative practices and processes. If not, there is a risk that these innovative practices will become the new “standard” without any reward for growers. Carbon farming should not become a new mandatory baseline, but an environmental service remunerated in a market that complements farmers’ income.

The promotion of low-carbon sugar, by maximizing the synergies between the upstream and downstream parts of the sector, remains of key importance for our sector: it should achieve the “net zero by 2050”, notably through the development of biogas made from sugar beet residues, be it on-farm or on the beet sugar factory site. Such development should be promoted and supported by the EU institutions.





# CIBE IN EUROPE



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Sugar  
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Sugar Beet  
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