



LUND
UNIVERSITY

Has the EU Been Subject to Capture by Corporate Interests?

Analysis of the Impact of Corporate Lobbying on the Scope and Implementation of
the Farm to Fork Strategy

Author: Leyal Atta

Supervisor: Jakob Gustavsson

Lund University

Department of Political Science

STVK02, Autumn Semester 2022

Abstract

The sphere of agricultural policy within the European Union forms the centre of an ongoing battle between industry lobbying, which pushes for delays and revisions to regulation, and those who want the EU to focus on creating regulations that safeguard a sustainable future for European agriculture. This thesis will examine the methods used by the agricultural lobby in their attempt to dominate the discussion of the Farm to Fork Strategy and its objectives, as well as the degree to which the European Union and its decision-making structures have been captured by these corporate interests. This case study has been conducted through a content analysis of 6 documents such as meeting notes and open letters, as well as official EU press releases, this thesis will construct an argument about the extent of state capture, where the EU Commission is under pressure from multiple avenues and is forced to make concessions despite seeking to reaffirm its commitment to the original Farm to Fork Strategy. The result of the study points towards the fact that the methods used by the agricultural lobby in Europe has captured and influenced EU decision-making structures, such as the EFSCM and the Council of the EU and its member states.

Keywords: European Union, Farm to Fork, State Capture, Lobbying, Environment and Agriculture, Pesticides

Contents

1. Introduction	4
1.2 Problem Formulation and Research Question	6
1.3 Earlier Research	7
2. Background	8
2.1 Pesticide regulation and politics	8
2.2 Influential Lobbying groups and their involvement	10
3. Theory	11
3.1 Lobbying Within the EU	11
3.2 Pluralism and Neo-Corporatism	12
3.3 State Capture	13
4. Method and Material	15
4.1 Material	17
5. Results and Analysis	18
5.1 Document 1: 9 March 2022 - European Commission	
5.2 Document 2: 23 March 2022 - European Commission	
5.3 Document 3: 28 April 2022 - COPA and COGECA joint Praesidia meeting (RB)	21
5.4 Document 4: 10 November 2022 - 29 NGOs	23
5.5 Document 5: 17 November 2022 - Joint open letter from agri-food organisations	24
5.6 Document 6: 19 December 2022 - The Council of the EU	24
6. Conclusion	26
Bibliography	28

1. Introduction

With a continually increasing population, there is more pressure on the food industry within the European Union to continue to increase the production of high quality foods. This production often involves the usage of different synthetic pesticides, as well as fertilisers. Pesticides are useful in agricultural production as a method of preventing, destroying, or controlling pests or diseases, which threaten both the production rate and the quality of agricultural food products (HFFA, 2013; ECPA, 2020). However, the widespread use of these pesticides by the EU agricultural industry poses a risk not only to human health but also to the health of our ecosystem; pesticides have directly caused harm to biodiversity and led to a decline in the overall health of the environment. Despite the negative consequences of large scale industrial pesticide use, the agricultural industry within Europe has a lot to lose in a potential legislation to limit pesticides and is willing to use its power to resist such measures from being taken. Even though the European Union has some measures in place to regulate and limit the use of pesticides and is continuing to work on developing new strategies, the dependency on pesticides is still very apparent and damaging (Hüsker & Lepenies, 2022).

In the spring of 2020 an ambitious new strategy, named Farm to Fork, was made public as part of the wider EU Green Deal. The main goals of the strategy, aside from food security and safety, are to;

1. ensure sufficient, affordable and nutritious food within planetary limits
2. halve the use of pesticides and fertilisers and sales of antimicrobials
3. increase the amount of land devoted to organic farming
4. promote more sustainable food consumption and healthy diets
5. reduce food loss and waste
6. combat food fraud in the supply chain
7. improve animal welfare

In summary the strategy calls for a substantial decrease in the use of both synthetic fertilisers and pesticides. The targets set out included a 50% reduction in the use of pesticides and a 20% reduction for fertilisers, all to be achieved by the year 2030. Farm to Fork was deemed to be a strategy that could have the prospects at changing how the agricultural sector is

shaped, resulting in improved public health, biodiversity and decreased greenhouse gas emissions. The Farm to Fork strategy was, unsurprisingly, met with resistance from the agricultural industry, which argued that the strategy would lead to lower yields, increased food prices and impossible salaries for farmers. The industry has resorted to lobbying both member states and the decision-making bodies of the EU in order to push its agenda to the forefront of the discussion. Since 2020 it is reported by EU Transparency Register that just the 4 largest pesticide corporations spent over €10,000,000 on lobbying, mainly in newspapers, conferences, private meetings and impact studies.

The Farm to Fork strategy was not the first such attempt at limiting the use of pesticides within the EU. Since 2009 the implementation of the Sustainable Use of Pesticides directive ([Directive 2009/128/EC](#)) has been ongoing, but has been regarded as a failure due to several institutions and EU member states not being able or willing to implement the policy. After pressure the European Commission has on 22 June 2022 adopted proposals that paved the way for new regulations as a revision of this failed strategy, of which the ‘Farm to Fork’ strategy is included (Pesticide Atlas, 2022).

Both prior to and after the announcement of the Farm to Fork strategy, agricultural corporations and their affiliated lobby groups have been trying to influence and change the proposals made within the strategy. The proposals within the deal must be approved by EU Member States, in the Council, as well as the European Parliament (Clift 2013, p. 104). The debate over the exact details and timeframes to be implemented are still being debated in these spaces, but it is expected that the agricultural industry will continue to put a lot of resources into watering down and delaying the original proposals made.

1.2 Problem Formulation and Research Question

The purpose of this study is to analyse the extent to which the agricultural lobby has captured the EU decision-making structure and member states, shaping and changing the implementation of legislation surrounding the EU Green Deal, specifically the Farm to Fork strategy. The study puts the main focus on actors within the pesticide industry, agricultural lobby groups and the European Union. Studying potential changes made to the timeframe and contents of the Farm to Fork strategy, by looking at documents and communications made by

any of these actors, will be imperative to understand the level of influence lobby groups have in the EU.

The methodology chosen for this study is a case study approach, specifically focusing on the Farm to Fork scheme. To be able to determine the extent of capture and answer the problem formulation presented in this study, a qualitative content analysis will therefore also be used as a part of the methodology. The question to be answered in this study is therefore:

“To what extent has the European Union been captured by corporate interests, and what role has corporate lobbying played in this?”

The underlying hypothesis for this study is that organs within the European Union have been captured by corporate interests during the ongoing discussion about the Farm to Fork strategy. Demarcation of the study has been conducted with considerations to limited time, therefore this study only touches upon lobbying within the European Union. The timeline analysed is from 2020 to 2022, but most of the focus is directed on 2022. The study's only focus is on the Farm to Fork strategy and follows the course of legislation surrounding it.

1.3 Earlier Research

Earlier research done on agricultural corporations and their lobbying on the pesticide industry is limited, as the Farm to Fork strategy presents itself as an ambitious one and remains very distinctive. Corporate Europe Observatory (CEO), an independent transparency advocacy group established to build public awareness has released several research studies. CEO's study on the pesticide industry's toxic lobbying tactics against Farm to Fork has been documented in “A loud lobby for a silent spring” written by Nina Holland and Rachel Tansey released 2022. In the study, techniques that the lobbying industry is utilising are written about, documented and discussed. For example, there have been seven industry-funded impact studies, with lobby groups closely working with research institutions such as universities in order to support their own interests. Another tactic discussed is third country pressure. In this case the US has launched an international coalition to oppose the Farm to Fork strategy, in response to required commitments in areas such as animal welfare, pesticides and the fight against antimicrobial resistance. Another method is stated to be that voluntary commitments to the European Green Deal are being used as means of distraction, mainly to hinder binding rules. The study recounts several lobbying techniques recorded

since the start of the strategy, in which lobby groups push for false solutions. For example, those that involve increased usage technology and of Integrated Pest Management (IPM) approaches are noted as solutions that have been offered by the agricultural lobby but that do not actually address the issues that Farm To Fork aims to solve. The study concludes that despite these efforts, it is up to the European Commission to publish a proper proposal, with potential pitfalls appearing when it comes to the leadership of the European Parliament's Agricultural Committee. They deem that this Committee has been influenced by lobbying. The main takeaway being that it will be a test for the EU generally.

When it comes to influence and lobby groups, Naurin (2001) puts forward three different approaches within lobbying, one being that the governing body can *passively receive* the pressure from said organisations, then *counteract* their influence, or in certain cases *influence* them. In the possible choice of either, ideology takes place and starts mattering. To *passively receive* originates from the pluralistic view that everyone can participate and interest organisations are free to compete in an open market. The politicians only role was to receive said groups' interests and implement them (Naurin 2001, p.17). When pluralism came to form there was a large amount of critique in receiving interest groups demands to such an extended level. Critique was directed as interest groups were seen as egoistic channels that mainly advocate for their own self interest, wasting resources and public welfare according to the public choice theory (Naurin 2001, p. 18). *Influence* therefore focuses on the fact that the state should take on a bigger role when it comes to regulating these interest groups, touching on corporatism. This is specifically by balancing the possibility to influence and forming requirements and preferences for said interest organisations (Naurin 2001, p. 20-22).

2. Background

2.1 Pesticide regulation and politics

The discussion surrounding agrochemical regulation has been controversial, with several debates emerging over their use. Agriculture is considered the EU's largest policy area, in budgetary terms. The industrialization of agriculture is said to be destroying the ecosystem, with the use of chemicals as well as several crop rotations filled with mineral fertilisers causing damage to the soil microorganisms (Pesticide Atlas, 2022). In order to face this biodiversity crisis the Farm to Fork Strategy was proposed. The decline in biodiversity is said to be at a far more advanced level than the climate crisis is, which is mainly due to pesticides. In a recent study by Le basic, it was concluded that the general impact caused by the usage of pesticides in sectors such as public health, water quality, soil and food production are greater than the profits made by the pesticide corporations themselves (Bednarikova and Jilkova 2012, p. 24-28). The general conclusion reached by the study was that the businesses eventually benefit in a greater manner, in contrast to farmers who end up losing out with market prices being unstable. The creation of the strategy was mainly influenced by the initiative created by the European Citizens' Initiative (ECI), 'save bees and farmers', which was signed by over 1.2 million citizens within the EU. Conditions by the ECI were set out with higher demands presented, such as an 80% reduction in pesticide use by 2030 with eventual removal being marked for 2035. There would also be financial support for farmers to help with the non-toxic transition.

Farm to fork is deemed to be ambitious, with the European Commission aiming for greater reductions than previously recorded. In 2009, the Sustainable Use of Pesticides (SUD), (EC/2009/128) was set as law in the EU, setting out that synthetic pesticides were to be used as a last alternative only. The main takeaway was that the usage of Integrated Pest Management (IPM) would help against pests and mould, and working with it would mean replacing chemical pesticides and taking on preventative work instead, causing a more environmentally friendly alternative. SUD ended up not being carried out for several reasons, the main reason being that no reduction quantity was set with no mandatory targets to strive for. Instead, the EU member states were supposed to present their own targets, measures and numbers but failed as everything stood undefined with no end objective. It not being implemented properly prevented the usage of IPM which was set to be used by 2014,

meaning another decade of continued chemical pesticide use furthering damage to our health and biodiversity (Pesticide Atlas, 2022).

Another reason that contributed to the failure of the SUD is the fact that it wasn't included within the EU's Common Agricultural Policy (CAP), according to the European Court of Auditors report from 2020. It is reported that CAP contributed too little in terms of the general implementation of IPM, as both SUD and IPM were left out from the 2014 to 2020 rules. Many NGOs (Non-governmental organisations) share the opinion that an overhaul is necessary and that for the green deal and Farm to Fork Strategy to succeed, they need to be included within the CAP. Generally, CAP is critiqued for being more directed towards political purposes rather than its original focus of supporting farmers being attacked as something high cost providing low efficiency in need of a total reform (Bednarikova and Jilkova 2012, 26-29).

Member states have also resisted the Farm to Fork Strategy's pesticide reductions, recorded to be echoing industry arguments, and their own failures to implement appropriate pesticide control. Some member states are even opposed to higher tax or penalties when more hazardous pesticides end up being used (Bednarikova and Jilkova 2012, p. 25-28).

2.2 Influential Lobby groups and their main involvement

Desmog reports that **COPA-COGECA** combines two lobbying groups established in the late 1950s. The former, COPA, stands for the 'Committee of Professional Agricultural Organisations' and represents farmers. The latter, COGECA, stands for the 'General Confederation of Agricultural Cooperatives in the European Union', and focuses on European agri-cooperatives. Copa-Cogeca and another lobbying group, CropLife Europe, routinely collaborate for various lobbying purposes. For example, in one instance, they defended the use of genetically modified organisms and pesticides. Other efforts include joint letters within interest groups, private meetings, the commission of paid studies, and they are also reported to have special access within the EU. The latest report of the annual cost of lobbying is from 2019, with an estimate between €1,500,000 and €1,749,999 spent for each organisation, making a total of over €3,000,000.

Euroseeds is another trade association which represents around 67 companies that procreate, produce, inquire and market seeds. They also represent 30 national member associations from the EU including non-member states. They pride themselves on close relations with the EU ministers, commission, parliament and the council of ministers. Giants such as Bayer, Syngenta, UPL, Corteva and BASF all sit on the board. Euroseeds is an important actor in the battle against the Farm to Fork Strategy, and is said to have funded at least one impact assessment; the study conducted by HFFA Research, which concluded that the European Green Deal and Farm to Fork Strategy cannot be achieved without causing major food losses. In the EU transparency register from 2020, it is reported by Desmog that Euroseeds received EU grants estimated around €100,000 and in total they had spent around €1,500,000 in 2020.

The European Chemical Industry Council (Cefic) which is within Desmog's database known as a membership organisation which promotes the interests of the European agrochemical industry, with 670 members. With their connections in the chemical business sphere they are considered influential. According to foodwatch they are one of the largest lobbying groups, with a collective budget of €12 million. With a spending of around €9 million yearly, putting them in the top of trade associations is easy. When it comes to the EU Green Deal, Cefic has contributed to policies which push for a higher degree of sustainability and decarbonization.

3. Theory

3.1 Lobbying Within the EU

There has been continued debate around lobby groups and their ability to influence policy making. In the context of thinking that the influence of lobbying is overstated, Dür, Bernhagen & Marshall (2015, p. 975-977) make the argument that there are a lot of organisations involved, but also point out the importance of being able to understand that these lobbying groups are mainly seen as sources of information alongside several other organisations which are also let in and heard. However one of the main arguments against the widespread presence of lobbying organisations is the amount of resources they have at their disposal, which they can easily mobilise to gain political influence. This makes them able to hold political influence and power more easily than for example civil society groups.

Lobby groups are often contrasted with civil society groups, such as NGOs, due to civil society groups being seen as more focused on the interests of the population or minorities within the population that might require representation, rather than corporate interests. However, they have to face more restrictions and lack resources, especially on a transnational level. In contrast, when you speak about lobby groups they are often pushing for the status quo to be maintained, keeping the market at a similar level with the same restrictions (Dür, Bernhagen & Marshall, 2015, p. 951-953).

The European Union has a complex structure and is not easily understood. This has been a great benefit for corporate lobbying groups as they have both the resources and capacity to influence policy and decision-making. Even within the EU the role of separate member states is extensive but still not understood to its full degree. Member states are reported to make a comprehensive amount of decisions on several different matters within the EU, developing, negotiating, agreeing and coordinating everything that happens internally out of the public eye. A certain type of democratic deficit can be thoroughly noted regarding member states in the EU, due to the fact that citizens do not take part in general decision-making influencing the direction and shape of EU policy and strategy. Corporate interests overtaking public opinion can be noted as lobby groups hold constant contact and communication with member states, more so than any other civil society groups (Öberg 1997, p. 67-69).

Lobby groups have questions that they deem as important, but these issues are approached in different manners. Generally this is called political influence and the main directive is to impact decision making. To influence decision makers different methods are required, with political influence then split between formal and informal influence. Formal influence usually happens in a more neo-corporatist system, where parliamentary channels are utilised and general citizens are able to have influence through elections, or through a cooperative space where citizens form groups acknowledged by the state standing under their legal conditions. Informal influence is harder to attribute to one channel, since it usually happens in an informal manner. This leads into a division within informal influence, direct and indirect influence. Informal direct influence is defined as lobbying, where direct contact with politics is established, but when it comes to informal indirect influence we touch upon opinion formation (Öberg, 1997, p. 71-22, Molin, 2004, p. 2). The main avenue of communications in indirect lobbying is therefore done through a third party and can only be conducted to a certain degree. According to Wehrmann (2007, p. 45-47) the instruments used by lobby groups are vast and assembling information, investigations, conveyance of information, letters, petitions and keeping beneficial contacts in order to network, combined with possible interchange with decision makers, are necessary tools.

3.2 Pluralism and Neo-Corporatism

To understand lobbying the theory of pluralism needs to be defined. Early pluralists saw politics as an open environment, where the state's role was to receive their opinions and interests and turn it into applied politics. To be within pluralism means that said organisations act outside of the state and their politics, instead they are fully self-reliant but still want to influence the decision makers within the state. The politics develop through competition between different interest groups and the non mandatory participation in political spheres in a competitive setting is said to lead to enhanced fairness (Bache et al 2015, p. 312-315) .

In a more corporatist system the relation between state and interest organisations becomes more united, with the primary argument being that the state and interest organisations gain equal benefits in maintaining a relationship. The state needs an organ that can give an opinion in certain aspects of decision-making. The way interest groups influence public politics is apparent but also attributed as necessary, as it is often seen as a game where resources are at play and negotiating between those resources allows these interest groups to gain a limited voice in decision making. The neo-corporatist theory focuses on governance and impact,

giving the state an active role, and was created as a reaction to the pluralistic theory which is deemed to have a very positive outlook on interest organisations (Naurin 2001, p. 25). The state is not seen as a neutral actor but as a homogeneous institute which creates harder terms for said interest organisations to participate in decision making, especially with the limited amount of interest organisations allowed in the space. The theory surrounding the selection process of the said interest organisations is based on resources, as the state chooses to work with interest groups that dominate the territory within it, and these organisations are therefore the ones allowed the privileged access to decision making within the organ (Öberg 1994, p. 265) In conclusion, neo-corporatism, in contrast to pluralism, accepts governmental influence over associations and membership.

3.3 State Capture

In order to discuss how the agricultural lobby influences decision making in the EU to prevent the regulation of pesticides, it is useful to introduce the idea of state capture, or captured states.

State capture can be defined as the existence of a “distinct network structure in which corrupt actors cluster around parts of the state allowing them to act collectively in pursuance of their private goals to the detriment of the public good.” (Fazekas and Toth, 2014, in Stoyanov & Gerganov, 2019). The main elements of state capture are the captor, which offers illegitimate payment in order to have their interests represented, the public officials which develop and adopt biased regulations, the privileges that the captor receives, and the disadvantages faced by all other social actors due to biased regulations (Stoyanov & Gerganov, 2019). Stoyanov & Gerganov argue that the “ultimate effect of a state capture [...] is the existence of laws and regulations that violate two basic principles: the neutral attitude of the administration towards individuals, groups and interests in society when implementing public authority, and that of equality of individuals and interests in society” (2019). This idea can be linked directly to the focus on the agricultural lobby in the EU, but first it is important to look at how the idea of captured states fits into the structure of the EU itself more widely. The Corporate Europe Observatory uses the idea of state capture when analysing the extent to which EU governments are a channel for corporate interests (2019). Their argument is that too many EU member states have become captured states, in which corporate interests are able “to malignly influence the decisions they take on EU matters” (Corporate Europe Observatory, 2019). Therefore, “instead of acting in the public interest of their citizens” these captured

states “often operate as channels of corporate influence” (Corporate Europe Observatory, 2019). As corporate lobbies target both the European Council and the member states themselves, this creates a “massive asymmetry of influence” over “member states’ EU decision-making as civil society groups cannot match the privileged access and far greater lobbying capacity and resources of the corporate sector” (Corporate Europe Observatory, 2019). This fits with the idea of state capture, as the EU decision-making structure has been subject to the influence of corrupt actors, which are directly able to impact regulations. For example, “member states have collectively absorbed some corporate agendas and adopted them as part of the EU-wide agenda” such as investors’ protection in trade treaties [which allows] corporations to sue states for billions in compensation when governments act to protect their people and the planet” (Corporate Europe Observatory, 2019). It is clear therefore that the idea of state capture, or captured states, can be a useful lens through which the influence of the agricultural lobby over decision making processes in the EU in order to prevent the regulation of pesticides can be understood. However, it is important to discuss exactly how we can measure the extent of this influence, particularly in reference to the specific institutions and decision making processes that are present in the EU. By reviewing empirical evidence, in the form of official documents, NGO reports, and leaked documents, an assessment of the degree of state capture can be built, measured against the criteria described above. Stoyanov and Gerganov argue that since the captor and the captured are not expected to provide evidence of the capture process and the extent of capture, investigative techniques must be employed; there would need to be access to “confidential, hidden or secret information” (2019). Therefore, the extent of state capture can be measured by analysing such documents, assessing the methods being used by the agricultural lobby in the EU, as well as the impact of these methods. The EU has multiple sites of rule-making and decision-making which could be subject to capture by the interests of the agricultural lobby. Corporate Europe Observatory lists these sites as The Council of the European Union, The European Council, and the EU’s committee structure. The Council of the European Union is where “member states’ ministers and officials input into EU law-making and policy-making, primarily via working groups and regular ministerial meetings” (Corporate Europe Observatory, 2019). Therefore, if these member states have been captured by the interests of the agricultural lobby, then this capture will most likely spread to the Council. We can evaluate this first by looking at member states themselves, as well as the ideas and interests that they push at the Council level. We can also look at the direct involvement of the lobby at Council level. The European Council is where the “heads of government of EU nations

gather regularly for summits and to make pronouncements on the EU's broad future direction of travel" for example in terms of economic coordination (Corporate Europe Observatory, 2019). This provides a site at which the agricultural lobby can either directly target or use member states as middle men, giving them access to shape discussion that other actors, such as NGOs, do not have access to (Corporate Europe Observatory, 2019).

4. Method and Material

The purpose of this study is to find out to what extent the European Union has been captured by corporate interests and what role corporate lobbying has played in this. This will be done by looking into the influence the pesticide industry has over decision/policy making in the EU, specifically in regards to the EU Green Deal and the Farm to Fork Strategy. To properly study and answer the research question a case study and content analysis approach will be applied.

A case study can be used for many different purposes but usually are used for a discovery-driven purpose. This study will follow the discovery-driven example, as the aim is to understand and examine how the conflict of interests affect the EU. In a case study the research question itself becomes important to reflect over and abbreviate. The question applied to this study originally is very broad, "To what extent has the European Union been captured by corporate interest" which makes it difficult to construct a suitable method (Teorell & Svensson 2007, p. 50). Only by limiting the scope in this study will this be attained, and that is why the focus is on the EU Green Deal, more specifically on the Farm to Fork Strategy. This allows the study to mainly focus on the pesticide industry and to see how a more recent directive/proposal has been affected by interest groups. Through this, the study will be able to form a conclusion regarding corporatism and state capture. It is also important to consider that the people involved in a case study can change their behaviour with the knowledge that they are being studied, leading to a more biased research outcome.

To answer the research question at hand, a qualitative content analysis will also be applied. This is mainly intended to gather a deeper understanding and to be able to analyse already created policy documents, corporate reports, lobbying reports, and minutes of meetings with EU officials, which helps with avoiding people's biases that might be more present in other sources (Teorell & Svensson 2007; p. 264-265). Using a qualitative analysis will allow for the extraction of more important points from the specific documents chosen to be analysed. This is ideal for the study, as lobbying affecting legislation is usually hidden in text and analysing documents such as drafts and finished directives will allow me to point out the change during the full timeline of a specific strategy (Esaiassons et al. 2012. p, 57-61). A qualitative content analysis focuses on seeing frequencies and categories in different sets of material (Esaiasson et al. 2012. p, 211-213). Using Content analysis would have been good in the case of finding the latent content and reading in-between the lines, and also for the inclusion of more hermeneutics. A qualitative content/text analysis therefore is one of the most appropriate

methods for research where a certain degree of social complexity is apparent. As an author there is an important role when it comes to deciphering and choosing the data which points to a point where the case could possibly become subjective (Denscombe 2010, p. 55). Although Simons (2009) sees it as something that is inevitable as qualitative research is often conducted by the researcher and their personal opinions are bound to get included one way or another. The main takeaway being that documenting potential subjective pitfalls becomes more important to be able to see how one's own opinions could have affected the general outcome of the study.

4.1 Material

The material aimed to be used in this study makes use of several types of documents. Reading through a vast amount of material such as official position papers, lobbying records, corporate reports, responses to EU consultations, minutes of meetings with EU officials, third-party civil groups, presentations and news reports. The usage of second hand sources will be central to the study, this to cover theoretical and empirical research on the research question. Six separate documents have been selected to analyse from a timeline within 2022. The first document to be analysed is from 9 March 2022 and details the minutes of meetings with EU officials, titled “*Meeting of the Expert Group on the European Food Security Crisis preparedness and Response Mechanism (EFSCM)*”. The second document also documents minutes with EU officials in a meeting of the EFSCm, which occurred later the same month (22 March). The third document, released 28 April, is obtained by DeSmog and records a private meeting between an influential lobbying group, COPA-COGECA, and the European Commission. The fourth document, from 10 November, is a joint letter from 32 different NGOs addressing European decision makers. The fifth document, from 17 November, is taken from influential lobby groups sending out an open letter calling for an impact assessment on the Farm to Fork Strategy. The sixth document is from 19 December and is a press release published by the Council of the EU following their decision to call for an impact assessment to be conducted. With the EU Green Deal being published in May 2020, and the proposal being released on 23 March 2022, the timeline focus for the study was mainly on the year 2022. This is because the most intensive lobbying efforts were conducted during this timeframe.

5. Analysis and Results

In this section analysis of the documents will be conducted, with each document treated separately. Each document will be described with background provided, as well as a discussion of how the contents of these documents impact the wider argument when measuring the extent of corporate capture in the European Union, as well as the methods utilised to achieve this.

5.1 Document 1: 9 March 2022 - European Commission - Meeting of the Expert Group on the European Food Security Crisis preparedness and Response Mechanism (EFSCM)

This document provides the details of a meeting of the Expert Group on the European Food Security Crisis preparedness and Response Mechanism (EFSCM) on 9th March 2022. In the document, it is revealed that ‘some stakeholders called for a slower implementation of the European Green Deal / Farm-to-Fork (EGD/F2F) objectives in order to boost food production, whereas others called for maintaining or accelerating the implementation of these same objectives to strengthen the resilience of the EU food system to crises.’ We can infer from the context that these stakeholders which call for a slower implementation of Farm to Fork objectives are agricultural corporations and their lobby groups. However, as noted in the document, space was given to those who expressed the opposite opinion, that the Farm to Fork objectives need to be maintained or actually accelerated. Taking this at face value, it seems that this expert group provides space for multiple actors, which represent opposing interests. This suggests a more pluralistic nature to this body, rather than one which may have been captured by corporate interests. However, investigative journalist organisation DeSmog points out that ‘representatives from lobby groups and corporations make up 80 percent of the [EFSCM’s] members and observer participants’ (Carlile & Healy, 2022) which suggests that the overall power and influence wielded by the agricultural lobby and corporations outweighs that of opposing voices quite considerably. This allows them to put higher pressure on the European Commission to push their interests. It also suggests that the EFSCM itself is partially captured by corporate interests, as even though there may be opposing voices, they are outnumbered and cannot exert the same influence as the agricultural lobby.

The EFSCM itself was established to ‘improve cooperation between the public and private sectors and evaluate risks when crises arise’ (European Commission, n.d.) which includes EU member states, as well as organisations such as lobbying groups. The European Commission

first detailed the purpose of the EFSCM on 12 November 2021, when it stated that the purpose ‘will be bringing together the Commission, Member States, relevant non-EU countries and stakeholders’ organisations’ in order to improve communication and planning in times of major risk to EU food security.

One of the biggest threats to the EU’s food security at the time of writing remains the Ukraine - Russia conflict, along with the subsequent rise in energy and fuel prices. The document mentions the Ukraine conflict as the central reason for the meeting itself taking place. The stakeholders that called for a slowing of the implementation of the Farm to Fork objectives are using the context of the Ukraine conflict to make an argument centred on food security, taking advantage of the opportunity provided by the meeting of the EFSCM in order to push their interests into the discussion in order to shape the views of other Commission members.

However, in the closing statement, the Director General for Agriculture and Rural Development Wolfgang Bartscher states that ‘reducing the ambition of the new CAP as regards its contribution to the EGD and F2F would not improve food system resilience, and in particular of the significant present and coming challenges presented by climate change.’ The Agriculture and Rural Development department is a department of the European Commission, responsible for ‘EU policy on agriculture and rural development and deals with all aspects of the common agricultural policy (CAP)’ (European Commission, n.d.). Therefore, the fact that the Director General for AGRI is making such a statement suggests that, despite the majority presence of the agricultural lobby in the EFSCM and their use of the meeting focusing on the impact of the Ukraine conflict to push their interests, the European Commission has not been subjected to a capture by corporate interests.

5.2 Document 2: 23 March 2022 - European Commission - Meeting of the Expert Group on the European Food Security Crisis preparedness and Response Mechanism (EFSCM)

The second document that this study will look at provides details of a follow-up meeting to that which was discussed in the first document. On 23 March 2022, the EFSCM met again to follow up on discussions had in the first meeting and to track the development of events related to the Ukraine conflict. In this document, it is stated that during the meeting ‘members expressed different views on the balance between short term measures addressing pressing needs to increase production and the longer term respect of the commitments towards the Green Deal and the Farm to Fork Strategy’ where again we can assume that the present

agricultural lobby groups are the ones arguing for short term measures to increase production in contradiction to the longer term aims of the Farm to Fork Strategy. This again suggests that the presence of the agricultural lobby in these high level meetings allows them to attempt to shape discussion and influence the actions of others present, in order to support their own interests. However, the commitment to the Farm to Fork Strategy was reaffirmed in the conclusion, where it is stated that ‘the objectives of the European Green Deal and Farm to Fork are still high on the agenda given the strong interconnection between food security and resilient food systems.’

In reference to these first two documents, wider arguments can be brought in. Corporate Europe Observatory argue that several lobby groups are using the ‘horrifying Russian invasion in Ukraine’ as an ‘as an excuse to call for the EU Farm to Fork Strategy to be reconsidered’, citing documents from the FNSEA (National Federation of Agricultural Holders' Unions) in France, as well as Copa-Cogeca. In these documents the groups call for the Farm to Fork Strategy to be questioned. Therefore, it is clear that the lobbying revealed in these first two documents is part of a wider campaign, in which the lobbying is aimed at using the Ukraine conflict and ensuing crisis as an excuse to avoid the objectives set out by the Farm to Fork campaign. However, the amount of direct and quick success seen by the use of this tactic is seemingly low, as the Director General of AGRI in the European Commission still states at the end of the meeting that the objectives of the Farm to Fork strategy should be upheld. It does, however, continue to mount the pressure on the European Commission.

5.3 Document 3: 28 April 2022 - COPA and COGECA joint Praesidia meeting (RB)

The third document which can help to evaluate the extent to which the EU has been captured by corporate interests is taken from a private meeting between Copa-Cogeca, a trade body representing European farmers, and the European Commission. This information was obtained by DeSmog, an investigative journalist organisation focused on climate change. The document details the minutes of the meeting, where the Copa-Cogeca representatives are calling for a revision to the Farm to Fork Strategy in light of the Ukraine conflict, as well as the economic fallout from COVID-19.

For example, the representatives stated that ‘the Commission has to show flexibility and adapt so that farmers can persevere; the F2F strategy should be adapted as it dates from before COVID and the war’ and that ‘F2F contained good approaches, but the situation changed. We have a drop in food production and increasing prices. The Commission must

reconsider its F2F and Biodiversity strategies.’ Here it is clear that the Copa-Cogeca representatives are trying to push for revisions to be made against the Farm to Fork strategy, using the current crises as a reason to prioritise ‘food security’ before other concerns. Building from the arguments made when looking at documents one and two, it is clear that the statements made during this meeting fit into the wider strategy of using the current geopolitical and economic situation to undermine the progression of the Farm to Fork Strategy altogether, or to limit its scope and the level of implementation. The fact that organisations such as Copa-Cogeca have the ability to hold private meetings with the European Commission also highlights the resources they have available. In documents one and two, the agricultural lobbying groups were pushing their interests in the context of a meeting that contained varying opinions and interests, despite their majority presence. However in this case, they are able to use a private meeting to push their interests without other interests and opinions being present. This means that the agricultural lobby is able to make use of multiple avenues of pressure on the European Commission. By capturing the EFSCM, they are able to mount pressure in the name of ensuring food security in times of crisis, as well as being able to continue to make the same arguments in private meetings.

The Commissioner responded to the statements made, saying that ‘we are taking a very close look at the F2F strategy and food security measures and we continuously monitor the impact of the strategies on food security and the agri-food sector’ for example that ‘the decision concerning fallow land is a result of our monitoring as excluding 40 m hectares would have an impact on food security. In the long-term it would be beneficial to sustainability, but in this exceptional context farmers have to have the possibility to use these areas.’ This is in reference to an exemption made by the European Commission to ‘allow the production of any crops for food and feed purposes on fallow land’ on 23 March 2022 (European Commission, 2022). This is an exemption from one of the Farm to Fork Strategy objectives, which was aimed at sustainability, but the European Commission classified this objective as having an impact on food security during the time of crisis. However, the Commissioner reaffirmed the other objectives of the Farm to Fork Strategy, stating that ‘other parts of the F2F strategy have no impact on food security [...] so they do not need to be addressed or changed.’ This suggests that despite the continued pressure from the agricultural lobby, the EU has only temporarily backtracked on objectives where food security is deemed to actually be at risk, rather than to the other objectives that the agricultural lobby also want to revise or change.

However, with maintained pressure on the European Commission from multiple avenues, the agricultural lobby might be able to achieve more.

5.4 Document 4: 10 November 2022 - 29 NGOs, the European organic movement, beekeepers and IBMA (biocontrolmanufacturers) call on the Parliament and the Council to support the Commission's proposal on the SUR despite attacks to weaken it and delay its adoption

The fourth document takes a different focus, instead looking at the opposition to the agricultural lobby and its interests. In this document, many NGOs state that they 'strongly condemn the attacks to weaken the ambition of the proposal for a Sustainable Use of Plant Protection Products Regulation (SUR) and to delay its adoption' as it is 'crucial to implement the Farm to Fork and Biodiversity Strategies.' They also add that the 'revision of the Directive on the Sustainable Use of Pesticides (SUD) must lead to an ambitious SUR reform' which would help to lead to 'a toxic free environment, protecting the environment and achieving resilient farming systems capable of securing food production and facing current and future crises.' However, they also state that 'during the AGRI-FISH Council meeting held on 26 September 2022, farm ministers from Austria, Bulgaria, Estonia, Hungary, Malta, Poland, Romania, Slovenia and Slovakia sent a request to the European Commission to carry out a second impact assessment on the SUR proposal' alongside members of the European People's Party, who called for the withdrawal of the proposal based on 'the possible impact of pesticide reduction on food security.' In counter to this, the NGOs call for 'Agriculture, Health and Environment Ministers and Members of the European Parliament not to call for further delays in the adoption of the SUR, and to work towards achieving an ambitious SUR.' Here we can see the inner workings of the battle over the Farm to Fork Strategy in the European Union. The NGOs and scientific bodies within the European Union are facing off against the power and interests of the agricultural lobby; as the document argues, 'as highlighted by civil society groups and scientists, postponing and diluting environmental action [...] would only move us further away from securing long term food production and becoming resilient to threats like climate change and the biodiversity crisis.' So, leading from this, we can assume that within the European Union there is a plurality of opinions towards the objectives outlined in the Farm to Fork strategy, with the agricultural lobby pushing for revisions and delays to the objectives and NGOs and scientists calling for the immediate implementation of these objectives. As we have seen with the previous documents, the

agricultural lobby has much greater resources, effectively able to capture the EFSCM through majority representation as well as holding private meetings with the European Commission in order to increase pressure in favour of their interests. In order to fully evaluate the extent to which the European Union has been captured by corporate interests, we must look at further documents in order to see how the battle over a further ‘impact assessment’ of the objectives laid out in the Farm to Fork Strategy was decided.

5.5 Document 5: 17 November 2022 - Joint open letter from agri-food chain organisations regarding the potential impact of the current proposal on Sustainable Use of Plant Protection Products Regulation (“SUR”) on the EU agricultural value chain, considering the current socio economic situation in Europe

The next document is a joint letter from several agri-food chain organisations, such as Copa-Cogeca and CropLife Europe, where the representatives of the agricultural lobby call for a new impact assessment on the objectives of the Farm to Fork Strategy. In the document, the agribusiness organisations state that ‘there is still a need to carry out a comprehensive assessment of the cumulative economic, social and environmental impacts of the various targets set in the SUR proposal’ and that ‘targets proposed should be science-based, practical, coherent with other policy areas, but also measurable and achievable, whilst safeguarding food and feed security in the EU.’ They also state in the document that ‘the policy framework needs to be amended to include the adoption of a horizontal EU Innovation framework.’

This letter forms part of the agricultural industry lobbyists strategy, alongside the capture of the EFSCM and the mounting pressure on the European Commission in private. The joint letter provides a public facing response, building off of the already mentioned member state pressure on the European Commission to carry out a new impact assessment and delay the discussion and implementation of the objectives of the Farm to Fork Strategy.

5.6 Document 6: 19 December 2022 - The Council of the EU - Council calls for a complementary impact assessment on the sustainable use of plant protection products proposal

The sixth document will examine one avenue that the agricultural lobby makes use of, which is the Council of the EU and EU member states. It will also allow for a more extensive assessment of the degree of state capture that is present in the EU decision-making structures.

On 19 December 2022, the Council of the EU issued a press release, titled ‘Council calls for a complementary impact assessment on the sustainable use of plant protection products proposal’ in which they detail that although member states agree with the principle behind the pesticide reduction targets outlined in the Farm to Fork Strategy, they are calling for a new impact assessment. It is argued that ‘since the impact assessment provided by the Commission is based on data collected and analysed before the outbreak of Russia’s war in Ukraine, member states are concerned that it does not take into account the long-term impact on food security and the competitiveness of the EU agricultural sector.’ It is also argued, in a progress report presented by the Czech Presidency, that ‘reduction targets at national level should be decided in a flexible manner, taking into account the specific conditions of each member state.’

The Council of the EU is where the ministers and officials of the EU member states come together to have their input on EU policy. Therefore, if the member states of the EU themselves have been captured by the corporate interests of the agricultural industry, then this capture would spread into the Council of the EU as ministers use their influence to push certain interests. Given the context of the previous two documents, where the NGOs argued against a new impact assessment and for the rapid implementation of the objectives set out in the Farm to Fork Strategy, and the agribusiness lobby pushed for a new impact assessment, we can see the extent of state capture of one site of EU decision-making. Despite many supporters, the NGOs arguing for avoiding another impact assessment have access to less resources than the agribusiness lobby that argues for the contrary. As a result of this, the agribusiness lobby has been able to influence member states and merge their interests, creating a level of state capture when regarding agricultural policy. This then extends to the Council of the EU, where the constituent member states decided to request an impact assessment from the EU Commission. Whilst the demands of the NGOs fell on deaf ears, the member states and the agribusiness lobby were able to pursue their interests and force the European Commission to submit to the reality of a new impact assessment, which will delay any discussion or implementation of the Farm to Fork Strategy until the results are delivered. These actors have been able to use the Ukraine conflict and the economic situation to push the narrative that the objectives set out in the Farm to Fork campaign are dangerous to food security, despite the fact that these objectives are designed to improve long term food security and sustainability. Overall this suggests that the Council of the EU has been subjected to corporate capture, as the interests of the agricultural lobby are being

overrepresented and pushed by the member states' representatives at the expense of the NGOs that argue for the opposite. The lobby is able to dominate the EFSCM, hold private meetings with the European Commission, and use the member states' representatives in the Council of the EU to put massive pressure on the Commission to delay and revise the targets set out in the Farm to Fork Strategy.

6. Conclusion

To conclude this research, firstly we must evaluate how the evidence gathered through the documents analysed and discussed measures against our discussion of theory. When discussing state capture, we set out a method of evaluating the extent of state capture, or capture of EU decision-making structures, by examining the methods that the agricultural lobby has at their disposal compared to other interest groups. The analysis of the structure of the EU itself outlined multiple avenues in which corporate interests could be asserted, as well as displaying multiple sites which could be subject to capture by those interests.

The evidence gathered through the analysis and discussion of the six documents shows that certain sections of the EU decision-making structure have been subject to capture by corporate interests. Firstly, the EFSCM, the expert group set up by the European Commission to monitor and act in the time of current crisis, has been captured by corporate interest. Although the presence of alternative views is noted, the group is still dominated by the agricultural industry and affiliated lobbying groups, which have used the group and the context of the crisis caused by the Ukraine conflict and economic downturn to achieve some small changes in the objectives set out in the Farm to Fork Strategy. Focusing on food security, the European Commission decided to temporarily postpone the long term sustainability objective of reserving certain land for biodiversity rather than farming. However, the European Commission had managed to resist the further pressure coming from the agricultural lobby, reaffirming the other objectives of the Farm to Fork Strategy that they deemed to not have an impact on food security. However it is still clear that without the pressure mounted from the agricultural lobby, this change would probably not have been implemented. It is arguable then, that from the evidence obtained from the analysis of documents one and two, that the EFSCM expert group has been captured by corporate interests, and has been used as an avenue of exerting pressure on the European Commission in order to delay and revise the Farm to Fork Strategy. It has not been completely successful though, as the Commission had resisted further changes.

The agricultural lobby was also able to use private meetings in order to attempt to influence the European Commission, as part of a wider strategy to pile pressure on the Commission, which also was documented as a common strategy by Corporate Europe Observatory's 'A loud lobby for a silent spring', (2022). Although the corporate interests have not yet captured the European Commission itself, they are using multiple routes to apply pressure on the Commission, including captured organisations, to try and make the Commission submit to

these corporate interests of the agricultural lobby. This evidence is taken from the third document, but the fourth, fifth and sixth documents highlight this further. In these documents, we see a story unfold in which two opposing groups of interests are battling to influence the European Commission. NGOs and scientists are calling for the objectives to be maintained and possibly even made more ambitious, whereas the agricultural lobby is calling for the objectives to be delayed and revised. Both sides made the use of an open letter, directed to the European Commission, calling for their respective interests to be upheld and implemented. However, the agricultural lobby had access to another avenue of pressure, along with their open letter. By lobbying the EU member states and the Council of the EU, the agricultural lobby was able to influence the Council of the EU into requesting that the European Commission conduct a new impact assessment regarding the objectives of the Farm to Fork Strategy. According to Naurin's (2001, p.17) research a heightened amount of passive receiving can therefore be noted, with a greater count of pluralism at hand.

So, overall, this research has highlighted the methods used by the agricultural lobby in Europe which have thoroughly been discussed and documented in Corporate Europe Observatory's 'A loud lobby for a silent spring' (2022) with the methods being seen in each document. Additionally arguing that some parts of the EU decision-making structure, such as the EFSCM and the Council of the EU and its member states, have been captured by corporate interests and are therefore able to apply significant pressure on the European Commission, so that their interests are overrepresented and pushed beyond anything the opposition can offer themselves.

Bibliography

- Bache, I. Bulmer, S, Parker, O, & Stephen, G. 2015. *Politics in the European Union*. Fourth edition. (Oxford: Oxford University Press, 2015)
- Clift, B, 2013. *Economic Patriotism, the Clash of Capitalisms, and State Aid in the European Union* in Journal Of Industry, Competition And Trade 13, no. 1.
- Denscombe, M. 2010. *The Good Research Guide: For Small-Scale Social Research*. Open University Press Projects, 4th ed.
- Dür, A. Bernhagen, P. & Marshall, D. 2015. *Interest Group Success in the European Union: When (and Why) Does Business Lose?* in Comparative Political Studies.
- Esaiasson, P. Giljam, M. Oscarsson, H. & Wängnerud, L, 2012. *Metodpraktikan: Konsten att studera samhälle, individ och marknad*. Stockholm: Norstedts juridik.
- Hüesker, F & Lepenies, R, 2022. *Why does pesticide pollution in water persist?* in Environmental Science & Policy
- Naurin, D. 2001 *Den demokratiska lobbyisten*, 1. uppl. Boréa, Umeå, 2001.
- Teorell, J. & Svensson, T. 2007. *Att fråga och att svara*.
- Wehrmann, I. 2007. *Lobbying in Deutschland. Understanding the Trends*. Lobbying. Structure, Actors, Strategies. Wiesbaden: VS Verlag.
- Öberg, P, 1997. *Medborgarnas inflytande och särintressenas makt. Korporatism och lobbying i statsförvaltningen. Rapport till förvaltningspolitiska kommissionen*. PISA-rapport 17, Statsvetenskapliga institutionen, Uppsala universitet

Electronic Sources

- Carlile, C & Healy, H, 2022. *Flagship EU Green Farming Reforms in Peril as Lobbyists Exploit Ukraine War*. Desmog. Accessed 22/10-22 from:
<https://www.desmog.com/2022/12/09/eu-farming-reforms-pesticides-targets-in-peril-lobbyists-exploit-ukraine-war/>
- Corporate Europe Observatory, 2022. *A loud lobby for a silent spring: The pesticide industry's toxic lobbying tactics against Farm to Fork*. Accessed 4/9-22 from:
<https://corporateeurope.org/en/2022/03/loud-lobby-silent-spring>
- Council of the EU, 2022. *Council calls for a complementary impact assessment on the sustainable use of plant protection products proposal*. Accessed 22/12-22 from:
<https://www.consilium.europa.eu/en/press/press-releases/2022/12/19/council-calls-for-a-complementary-impact-assessment-on-the-sustainable-use-of-plant-protection-products-proposal/pdf>

Corporate Europe Observatory, 2019. *Captured states: when EU governments are a channel for corporate interests*. Accessed 21/10-22 from:

<https://corporateeurope.org/en/2019/02/captured-states>

DeSmog, n.d. *Euroseeds Profile*. Accessed 3/10-22 from:

<https://www.desmog.com/agribusiness-database-euroseeds/>

DeSmog, n.d. *Cefic Profile*. Accessed 3/10-22 from:

<https://www.desmog.com/agribusiness-database-european-chemical-industry-council-cefic/>

DeSmog, n.d. *COPA-COGECA Profile*. Accessed 3/10-22 from:

<https://www.desmog.com/agribusiness-database-copa-cogeca/>

ECPA, 2020. *Low Yield II Cumulative impact of hazard-based legislation on crop protection products in Europe*. Accessed 10/10-22 from:

https://corporateeurope.org/sites/default/files/2020-09/10_CAB-3038452_200519_Low%20Yield%202%20Final%20March%202020_pdf.pdf

European Commission, n.d. *Agriculture and Rural Development*. Accessed 2/9-22 from:

https://commission.europa.eu/about-european-commission/departments-and-executive-agencies/agriculture-and-rural-development_en

European Commission, 2022. *Commission acts for global food security and for supporting EU farmers and consumers*. Accessed 29/10-22 from:

https://ec.europa.eu/commission/presscorner/detail/en/ip_22_1963

European Commission, 2021. *Contingency plan for ensuring food supply and food security in times of crisis*. Accessed 29/10-22 from:

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM:2021:689:FIN>

European Union, 2021. *Possible Future SUD Policy Options for Further Discussion with SUD WG Members*. Accessed 10/10-22 from:

https://corporateeurope.org/sites/default/files/2022-03/28_HU%20%282%29%20Attachment%202_SUD%20Policy%20Options_Final_2021-06-30_Ares%282021%294254433.pdf

European Court of Auditors, 2020. *Special Report 13/2020: Biodiversity on farmland: CAP contribution has not halted the decline* Accessed 22/9-22 from:

<https://www.eca.europa.eu/en/Pages/DocItem.aspx?did=53892>

European Commission, 2022. *Meeting of the Expert Group on the European Food Security Crisis preparedness and Response Mechanism (EFSCM) - 9 March 2022*. 22/9-22

<https://ec.europa.eu/transparency/expert-groups-register/core/api/front/document/76477/download>

European Commission, 2022. *Meeting of the Expert Group on the European Food Security Crisis preparedness and Response Mechanism (EFSCM) - 22 March 2022*

<https://ec.europa.eu/transparency/expert-groups-register/core/api/front/document/79757/download>

European Commission, 2022. *MINUTES - 28 April- Copa and Cogeca joint Praesidia meeting (RB)*. Accessed 22/9-22 from:
https://www.asktheeu.org/en/request/11636/response/39215/attach/7/012%20CABJW%20Ar es%202022%203363677%20COPA%20COGECA%2028%2004%202022%20marked%20Redacted.pdf?cookie_passthrough=1

HFFA, 2013. *The value of Neonicotinoid seed treatment in the European Union: A socioeconomic, technological and environmental review* Accessed 22/10-22 from:
<https://www.boerenlandvogels.nl/sites/default/files/HFFA%20Report.pdf>

Holland, N & Tansey, R. 2022. *A loud lobby for a silent spring*. Accessed from:
https://corporateeurope.org/sites/default/files/2022-03/Loud%20Lobby%20Silent%20Spring%20Report_0.pdf

2022. Joint open letter from agri-food chain organisations regarding the potential impact of the current proposal on Sustainable Use of Plant Protection Products Regulation (“SUR”) on the EU agricultural value chain, considering the current socioeconomic situation in Europe. Accessed 26/10-22 from:
<https://europatat.eu/wp-content/uploads/2022/11/Letter-Director-General-AGRI.pdf>

Le Basic, 2021. *Pesticides: a model that’s costing us dearly*. Accessed 22/11-22 from:
<https://lebasic.com/en/pesticides-a-model-thats-costing-us-dearly/>

2022. 29 NGOs, the European organic movement, beekeepers and IBMA (biocontrol manufacturers) call on the Parliament and the Council to support the Commission’s proposal on the SUR despite attacks to weaken it and delay its adoption. Accessed 13/10-22 from:
https://www.organicseurope.bio/content/uploads/2022/11/SUR_Joint_Letter_20221110_final-1.pdf?dd

Pesticide Atlas, 2022, *Facts and figures about toxic chemicals in agriculture*. Accessed 30/11-22 from:
https://eu.boell.org/sites/default/files/2022-10/pesticideatlas2022_web_20221010.pdf

Stoyanov, A & Gerganov, A, 2019. *State Capture: From Theory to Piloting a Measurement Methodology*. Accessed 8/11-22 from:
https://www.researchgate.net/publication/339214033_STATE_CAPTURE_FROM_THEORY_TO_PILOTING_A_MEASUREMENT_METHODOLOGY

Transparency Register, n.d. Profile for CropLife Europe. Accessed 6/11-22 from:
<https://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=0711626572-26>

Transparency Register, 2021, *Statistics*. Accessed 6/11-22 from:
<https://ec.europa.eu/transparencyregister/public/homePage.do?redir=false&locale=en>