



# NATIONAL GRAIN PRODUCERS ASSOCIATION

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## Statement of Support

from the **National Grain Producers Association (NGPA)** of Bulgaria to the **Romanian Alliance for Agriculture and Cooperation (AAC)**

Regarding emergency derogations for neonicotinoid seed treatments under Article 53 of Regulation (EC) No 1107/2009

**Sofia, April 22, 2025**

The National Grain Producers Association (NGPA) of Bulgaria expresses its full support for the Romanian Alliance for Agriculture and Cooperation (AAC) and Romanian farmers in their efforts to defend the right to use emergency derogations for neonicotinoid seed treatments, in the context of legal actions initiated by environmental or apicultural organisations.

Bulgaria shares many of the agronomic and climatic conditions with Romania and has observed, in recent years, a marked increase in pest pressure, including the grey corn weevil (*Tanymecus dilaticollis*), wireworms (*Agriotes* spp.), cutworms (*Noctuidae*), cereal leaf beetle (*Zabrus tenebrioides*), and *Diabrotica* spp., among others.

### **Current regulatory limitations severely hinder effective pest control**

The currently authorised insecticides share similar modes of action, which limits their long-term effectiveness and leads to resistance development. As a result, pest control has become increasingly ineffective, or requires deviation from good agricultural practices — including more than 1–2 foliar treatments per season, shortened intervals between applications, or inappropriate tank mixes.

### **There is currently no viable alternative for controlling *Tanymecus dilaticollis***

In Bulgaria, we have observed a significant increase in *Tanymecus* populations over the past five years, with the pest spreading beyond traditional hotspots and causing consistent damage in newly affected areas. The lack of effective alternatives, combined with milder winters and prolonged autumns, has led to higher overwintering survival and accelerated population growth.

Due to its polyphagous feeding behaviour, *Tanymecus* attacks maize, sunflower, and numerous spontaneous plant species. Pest control becomes increasingly inefficient, costly, and environmentally burdensome without effective seed treatments.

### **Policy decisions must reflect regional realities**

We emphasise the need for flexibility in EU regulations, particularly for Member States like Romania and Bulgaria, where pedoclimatic conditions and endemic pest pressures differ substantially from those in Western Europe.



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We support AAC's position that emergency derogations must remain available under strict monitoring until effective alternatives exist and pest populations are demonstrably under control. Denying access to these tools puts at risk not only yields and farm incomes, but also the food security of the entire region.

The NGPA stands in solidarity with AAC and Romanian farmers in their legal and institutional efforts, and supports a pragmatic, science-based, regionally-adapted approach to plant protection policy.

Respectfully,

**Mr. Ilia Prodanov**

Chairman of the National Grain Producers Association (NGPA)  
Sofia, Bulgaria

