



**EUROPEAN COMMISSION**  
**DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY**

Health and food audits and analysis  
Director

Grange,  
SANTE.F3 JVK/AOC/hmc

**Subject: Response to Open letter to SANTE - actions to ensure serious implementation of the SUD**

Dear Ms Christensen

Thank you for your letter of 21 March 2017, addressed to Mr Miko and myself, regarding the implementation of the Directive on Sustainable Use of Pesticides (SUD).

I confirm that the implementation of the Directive is an important dossier for DG SANTE, and is being given high priority.

In your letter you refer to the work plan for DG SANTE regarding implementation of this Directive, which I presented at the 5<sup>th</sup> IBMA Symposium in Brussels. As you know, we are currently carrying out six fact-finding missions on the ground and desk analysis of the questionnaire sent to all Member States. We have already carried out the planned fact-finding missions in Germany and the Netherlands, and the remaining four missions will be carried out by June. The reports of all of these individual fact-finding missions will be published in the usual way on the Health and Food Audits and Analysis webpage. The main findings and conclusions from both the mission series and the responses to the Questionnaire will be reflected in the first report of the Commission to the European Parliament and the Council on progress in the implementation of the Directive under Article 16 of the Directive. This report is expected to be submitted by November 2017.

In the meantime, two overview reports are expected to be published in May/June 2017 on the results of a series of audits on the Marketing and Use of pesticides (11 Member States audited) and the Authorisation of PPPs (7 Member States audited). Certain individual aspects of the SUD were covered in the audit series on the abovementioned Marketing and Use of pesticides (January 2015 - June 2016). This included the implementation of integrated pest management, operator training, disposal of empty pesticide containers and remnants and the prohibition of aerial spraying. The forthcoming overview report will provide information on our findings in these areas.

Article 4 of the Directive requires Member States to adopt National Action Plans to set up their quantitative objectives, targets, measures and timetables to reduce risks and impacts of pesticide use on human health and the environment and to encourage the development and introduction of integrated pest management and of alternative approaches or techniques in

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order to reduce dependency on the use of pesticides.

Member States must decide themselves how best to achieve these objectives and as you point out, two Member States (Denmark and France) have opted to set explicit targets for reduced use of pesticides. This does not necessarily mean that all other Member States are failing to implement SUD as there is no legal obligation to set targets for reduced use of pesticides as an explicit target in order to achieve the objectives of the SUD. The purpose of the ongoing fact-finding missions and questionnaire is to evaluate the level of implementation, to identify good practices and obstacles to proper implementation.

The report to be submitted to the European Parliament and to the Council will provide an assessment of the overall state of implementation and of the situation regarding the review of NAPs by the Member States. It will also map out areas for future improvement.

Based on the conclusions of this report, the Commission will consider how best to continue to work with Member States to achieve full implementation of the Directive throughout the EU, whether through a new audit series, exchange of good practices, removal of common obstacles or through other means. It is too early at this stage to select any one tool or combination of tools.

In parallel with the analysis described above, work is progressing on a new SUD webportal and this will facilitate exchange of information on key SUD topics. Progress is also being made on the Guidance Document on monitoring the impact of pesticide use referred to in Article 7(3) of the Directive. Both are expected to be completed during 2017.

I welcome the additional information on SUD implementation provided in your letter, and your ideas and suggestions. I am grateful for your offer to discuss your ideas in more detail.

You are very welcome to meet myself and my SUD team here in Grange. Alternatively, as I am regularly in Brussels, a meeting could be arranged there should you not be able to travel to Grange. In the meantime, you may wish to meet with some of my colleagues, including the Head of Unit with responsibility for SUD, Mr Andrew Owen-Griffiths, who will be in Brussels on 28 April and we have already initiated contact with your office to propose such a meeting.

Please inform me of any date for a subsequent meeting in Grange that would be suitable for you.

Yours sincerely

  
Paola Colombo  
Director

cc. L. Miko  
T. Bregeon  
A. Owen-Griffiths  
A. O'Connor  
J. von Kietzell  
T. Georgieva  
P. Kiss