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WORKING PAPER

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CONTRIBUTION

From:	General Secretariat of the Council
To:	Working Party on Agricultural Questions (Pesticides/Plant Protection Products)
Subject:	Report on Directive 2009/128/EC - EL comments

Delegations will find in Annex comments from Greece on the Report on Directive 2009/128/EC.

General comments regarding the conclusions of the Commission of the report on Directive 2009/128/EC (GREECE)

Conclusions of the Commission of the report of Directive 2009/128/EC focuses on the failure, of behalf of most Member States, to complete the review of their NAP's within the five- year legal deadline. This statement does not acknowledge that the 2009/128 EC directive demands several official structures to be put in place (training and certification of PPPs users, testing system of application equipment e.t.c.) which in order to build takes time. To our perspective that delay doesn't reflect the wiliness of Member States to review NAP's but the sort time they had available not only to create these procedures but also to evaluate them and to see the result they had in production and in the proper use of PPP's by professionals.

Because of the need for these procedures to be established (some of them included deadlines) the enforcement of IPM left behind as there were no specific requirements in directive for enforcement of IPM.

Enforcing IPM principles isn't a measurable target and to make a conclusion that there is limited evidence that IPM principles aren't systematically applied to our point of view isn't justified. Also, must be taken into consideration that the majority of the farmers weren't familiar with IPM principles.

IPM is a way to take into account all alternatives given in order to reduce the use of pesticides while this is ecological and economical sustainable. The availability of alternative methods isn't the same for all crops, for all countries or even for the same crops inside a specific country. It will be a very challenging task to enforce IPM as a statistic number and we are very concern about applying strict guidelines surveillance and infringement actions.

We should concentrate more on the risk-based surveillance methods and actions which are proved to be efficient and result oriented.

To improve the implementation of the IPM we need to put more efforts in training of stakeholders and in advising farmers to consider alternatives for plant protection other than pesticides. We should give benefits to farmers that using or willing to convert to more biological and other non-chemical methods. We should invest in new technologies that will increase the efficiency in the use of PPP's and also on research and development of innovative alternative methods.

In conclusion, we have doubts that the sales' indicator (HIR 1) can give us safe conclusions that there has been reduction in the risk of human health and environment, as there are so many variables that are not taken into consideration in this harmonized indicator.