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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 - LU comments

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

Follow-up to the Council Working Party “Agricultural Questions (Pesticides)” on 22 July 2020 (ref. WK 8154/2020 INIT)

Comments from the delegation of Luxembourg

Date: 19.8.2020

Report on Directive 2009/128/EC

Comment 1 (HRI1):

Several stakeholders consider the HRI1 to be “manipulative”, claiming that

- the trend of decreasing risks as shown by the HRI1 is not due to changes in actual PPP use patterns, but to the non renewal of approval of active substances that meet the cut-off criteria;
- the target of 50% risk reduction by 2030 could therefore be met by simply further withdrawing or not renewing the approval of such active substances, without any change in PPP use patterns.

This criticism should be taken into account when deciding on the further use or development of the HRI1.

Comment 2 (IPM):

During the SUD and IPM working group meetings, discussions regarding the degree to which the implementation of IPM principles have to be assessed and enforced at PPP user level were held. Different points of views persist. The wording of the respective articles of the SUD should be amended in order to provide clarity on this issue.

Economic reasons often hamper the adoption of IPM methods by farmers. IPM methods are either more expensive and/or increase economic risks (e.g. crop failure or crop quality). In order to improve the implementation of IPM, ways of decreasing the costs or economic risks for farmers should be explored.

The introduction of an IPM baseline, to be respected equally in all the Member States, could help preventing unfair competition between PPP users in different Member States.