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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 - PL comments

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



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The presidency of the Council of the European Union

-via e-mail only-

Having regard to *The report from the Commission to the European Parliament and the Council on the experience gained by Member States on the implementation of national targets established in their National Action Plans and on progress in the implementation of Directive 2009/128/EC on the sustainable use of pesticides* and discussion during the informal video conference on July, the 22nd Poland would like to rise some general comments.

In the opinion of Poland reports prepared by the Commission on progress in the implementation of Directive 2009/128/EC on the sustainable use of pesticides (SUD) should be discussed with Member States before publication. Some parts of the above mentioned Report presented by the Commission are not clear enough. For example the Commission established index to quantify the progress made in the implementation of each Article of the SUD by Member States, but Member States haven't been informed about the methodology of calculation of presented figures. As a consequence in the Annex to the Report there are presented graphs, which are difficult to be interpreted, especially by people not involved in SUD implementation.

The report repeats information about Member States "weakness in the application of the SUD", especially in the contexts of enforcement of IPM. It has been discussed many times, that implementation of IPM at farm level is difficult to be assessed. As I was agreed in *Council Conclusions on the ECA Report 5/2020 on the sustainable use of plant protection products: limited progress in measuring and reducing risk* translating IPM principles into controllable criteria is very difficult to be implemented and represents a challenge for which Member States need the support of the Commission. Taking it into account it is difficult to agree, that not satisfactory enforcement of IPM is just a weakness of Member States. It should be rather perceived as systemic problem.

Finally, it was agreed, that Harmonized Risk Indicators do not reflect properly risk level. A lot of risk reduction measures implemented by Member States are not taken into account by this indicators, which are based on sales volume. As a consequence such indicators are not a proper tool for setting goals in strategic documents as for example *Farm to Fork* strategy.

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