



Council of the European Union
General Secretariat

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LIMITE

**AGRI
PESTICIDE
SEMENCES
AGRILEG**

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 - NL comments

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

Delegations are invited to send written comments on both reports (separately) until August the 21 2020 to 713@bmel.bund.de, 313@bmel.bund.de, life3@consilium.europa.eu
Please consider the following questions in your interventions:

Report Evaluation Regulation (EC) No 1107/2009 and (EC) No 396/2005

Do you have comments regarding the needs for improvement and the planned actions identified by the Commissions presentation regarding the 16 action fields especially regarding their completeness and their conclusiveness?

- What recommendations for action should be given priority?
- Are there additional measures that should be considered?

Report on Directive 2009/128/EC

Do you have general comments regarding the conclusions of the Commission especially regarding their completeness and their conclusiveness?

How can the implementation of the integrated pest management be improved?

Please find enclosed some comments of the Netherlands on the *Report on Directive 2009/128/EC* from the European Commission as contribution to Council Conclusions on this report.

- 1) The report of the European Commission on the implementation of Directive 2009/129/EC gives reason for concerns about that implementation. More guidances and exchange of practices concerning the application of the principles of IPM should be welcomed, such as a greater use of non-chemical ways to protect harvests from pests and diseases. Also the EU statistics on the use of plant protection products and harmonised indicators could be improved as also stated by the Court of Auditors.
- 2) However, The Netherlands wants to point out that the findings in the report of the European Commission does probably not give a complete overview of all measures and policies in Member States concerning the sustainable use of plant protection products, reducing risks and the application of the principles of IPM. In The Netherlands, substantial additional policies and measures have been adopted by the Government and which are strongly related to the Directive 2009/128/EC but are not actually part of the current National Action Plan and not reflected in the report of the Commission. This should be taken into account when questioning the possible need for further harmonized measures.