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LIMITE

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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 - SI comments

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

DE Presidency
11. 8. 2020

Slovenian comments to the EC Report on Directive 2009/128/EC:

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

In order to achieve the objectives of the Sustainable Use of Pesticides Directive, it is essential that agricultural producers have at their disposal effective and economically viable alternative non-chemical methods of pest control that can replace chemical PPPs without the risk of crop failure or crop loss. The farmers economically dependent on yield cannot risk the losing of crops if there are no efficient alternatives to be used.

Further investment in research and development in the field of integrated plant protection is therefore needed to further promote the principles of integrated pest management. It is necessary to invest in the development of new methods, equipment and information systems for the transfer of knowledge and experience into practice.

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

Chemical plant protection products on the market are considered to be safe for use under Regulation EC 1107/2009, they are also allowed to be used in Integrated pest management under Directive 2009/128/EC if no alternatives exist.

After the sufficient efficient and cost effective alternatives are available, the implementation of the integrated pest management could be improved by legal requirements for the PPP user to carry out the obligations in the context of integrated plant management. The legislation has to include mandatory compliance with guidelines for each field of crop production and restriction of use of PPPs.