

**Joint contribution to the public consultation of the European Commission entitled “Plant protection products - records to be kept by professional users”**  
[Plant protection products - records to be kept by professional users \(europa.eu\)](https://european-citizens-initiative.europa.eu/)

3 November 2022

On behalf of 16 organisations across Europe including **environmental and health associations**, the organisers of the successful [European Citizens' Initiative “Save Bees and Farmers”](#), **trade unions representing agricultural workers, beekeeping associations**, the European umbrella organisation for **organic food and farming**, we welcome the draft Commission Implementing Regulation “as regards the content and format of the records of plant protection products kept by professional users pursuant to Regulation (EC) No 1107/2009” (Ares(2022)6918124) which aims to ensure the **digitalisation of pesticides use records** across the EU. We therefore call on the national governments to vote in favour of the draft Implementing Regulation as published for this public consultation.

Professional users of pesticides have had to record their use of pesticides for more than 10 years.<sup>1</sup> However, unless national laws provide otherwise, they can still keep these records in handwritten paper form. This makes their collection more difficult and therefore their usefulness more limited. Meanwhile, the agrochemical industry has been developing many IT tools enabling “digital farming”,<sup>2</sup> or more generally “precision farming”.<sup>3</sup> It is therefore about time that public authorities get data on pesticide use in electronic format.

These records are not only necessary for public authorities to carry out **controls**, (i.e. ensuring that the “plant protection product” are used in line with the applicable rules). They are also meant to enable the **efficient monitoring of pesticides in water**<sup>4</sup> and the minimisation of pesticide use in **protected sites** and other sensitive areas.<sup>5</sup>

Furthermore, the records contain precious data for the monitoring of the exposure of **agriculture workers**.<sup>6</sup> Public authorities in charge of protecting their health are, themselves, asking for this data.<sup>7</sup>

Finally, the digitalisation of the pesticides use records is a key piece of the puzzle **to enable long overdue meaningful pesticide use statistics across the EU**. Thanks to the reform of

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<sup>1</sup> In application of Article 67 of Regulation (EC) No 1107/2009.

<sup>2</sup> [Digital Farming | Bayer global](#).

<sup>3</sup> [Digital and precision agriculture - CropLife Europe](#).

<sup>4</sup> See Recital 44 of Regulation (EC) No 1107/2009; Under Directive 2000/60 Member States are required to “collect and maintain information on the type and magnitude of the significant anthropogenic pressures to which the surface water bodies in each river basin district are liable to be subject” (Annex II section 1.4 of Directive 2000/60). To that end, they need to collect data on the use of pesticides in the area connected to the river basin.

<sup>5</sup> In line with Article 12 of Directive 2009/128/EC and the Directive 92/43 and Directive 2009/147.

<sup>6</sup> « [Agriculteurs intoxiqués](#) » : [dans toute l'Europe, les malades des pesticides abandonnés à leur sort \(lemonde.fr\)](#).

<sup>7</sup> See Report from ANSES on the retrospective assessment of farm worker exposure: [Publication of the report on occupational exposure to pesticides: a need for better understanding and a reduction in exposure | Anses - Agence nationale de sécurité sanitaire de l'alimentation, de l'environnement et du travail](#) recommending notably “By improving the accessibility, pooling, exploitation and capitalisation of information relating to pesticides, especially that concerning the exposure of people working in agriculture.” and in particular the Annexe: [Annexe 5 - Rapport de l'Anses relatif à l'exposition des travailleurs agricoles aux pesticides](#) section 5.1 explaining the barriers they faced to access relevant data.

Statistics on Agriculture Input and Output (SAIO), which was [approved by the European Parliament on 4 October 2022](#), pesticide use data will not be collected any longer every five years and on different crops in different EU countries. Until 2028, the SAIO reform foresees that they will be collected every two years on a common selection of crops, and from 2028, **every year**. However, this annual collection will only happen if, meanwhile, the national governments approve this Implementing Regulation requiring professional users of plant protection products to keep records on the use of such products in electronic format ([Article 14\(2\) of SAIO](#)).

These are a few reasons why this Implementing Act, ensuring the EU-wide digitalisation of the records, is very welcome and long overdue.

**That is why we call on the national governments represented in the Standing Committee on Plants, Animals, Food and Feed ([PAFF committee](#)) to vote in favour of the adoption of this Implementing Regulation (version submitted to the public consultation) at the next meeting scheduled in December 2022.**

#### List of signatories

No	Name of organisation	Geographic focus	Logos
1.	ClientEarth	EU	
2.	PAN Europe	EU	
3.	Global 2000 – Friends of the Earth Austria	Austria	
4.	European Federation of Trade Unions in the Food, Agriculture, and Tourism sectors - EFFAT	EU	

5. European Environmental Bureau (EEB) EU



6. Corporate Europe Observatory EU



7. IFOAM organics Europe EU



8. European Beekeeping Coordination - Beelife EU



9. Health and Environment Alliance - HEAL EU



10. Hogar Sin Tóxicos Spain



11. FODESAM Spain



12. Pesticide Action Network Germany Germany



13. ECO HVAR Croatia



14. Ecologistas en Accion Spain



15. NABU Germany



16. SumOfUs EU

