



**Pesticide  
Action  
Network**  
Europe

24 September 2025

**Subject: Electronic registration of pesticides data should be implemented without delay**

Dear Minister,

We are writing to you to express our high concerns regarding the European Commission proposal to amend [Implementing Regulation \(EU\) 2023/564](#), delaying the electronic registration of pesticide use data by one year. The proposal is up for vote at the Scopaff meeting of 1-3 October 2025. This proposal follows calls of some Member States to postpone digital record-keeping of pesticide use data. **We ask you to vote against delaying electronic registration by one year. It is essential that electronic registration of pesticide use data is implemented without delay, from 1 January 2026, for the following reasons:**

- **Since 2009, Regulation (EC) 1107/2009<sup>1</sup> obliges professional users to keep records of pesticides used** (name, time, dose of application, area and crop) for at least 3 years, and to provide this information to competent authorities (on request of the competent authorities). Data is thus available but the lack of systematic electronic data registration on pesticide use is highly inefficient, and forms a major barrier.
- **The Council expressed to the Commission the need for electronic record keeping to facilitate the annual collection of data on the use of pesticides.** This demand was formulated in the framework of the negotiations on Regulation 2022/2379 on statistics on agricultural input and output (SAIO) in June 2022<sup>2</sup>.
- **Following the expressed needs, the Commission proposed Implementing Regulation (EU) 2023/564<sup>3</sup>.** The Implementing Regulation was adopted after elaborate consultation with member states. The obligation to keep data electronically was made mandatory only from 2026, to provide enough time for the practical implementation.
- **Regulation (EU) 2023/564 facilitates the fulfillment of existing obligations of data keeping laid down by Regulation (EC) 1107/2009, as well as of the obligations of**

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<sup>1</sup> [Regulation \(EC\) No 1107/2009](#)

<sup>2</sup> [Regulation \(EU\) 2022/2379 - Provisional Agenda - Special Committee on Agriculture - June 2022](#)

<sup>3</sup> [Implementing Regulation \(EU\) 2023/564](#)

**the SAIO regulation.** Digital record keeping of pesticide data will greatly decrease the administrative burden, while providing more accurate information.

- **The SAIO Regulation and the Implementing Regulation (EU) 2023/564 (related to 1107/2009) are crucial for Member States, EU citizens including farmers, and EUROSTAT, as it establishes a standardised framework for the collection, reporting, and analysis of data on agricultural inputs and outputs across the EU.** Together, these regulations support evidence-based policymaking by ensuring the availability of reliable, comparable, and up-to-date statistical data. These data are a prerequisite to identify pesticide-intensive crops and give special attention to those in priority, in order to support a transition to more sustainable practices and protect people's health and the environment.
- **Digital data on pesticide use are essential and long overdue.** Pesticides are a major cause of the collapse of biodiversity, pollute our soils and water bodies, degrade ecosystem functions, and undermine health of farmers, their families and communities, and other citizens. **The lack of pesticide use data is a major barrier to robustly assess trends in pesticide use and risk.**
- Through European citizens' initiatives, consultations, an IPSOS opinion poll, the Conference for the Future of Europe and EU Barometers and petitions<sup>4</sup>, citizens **have expressed repeatedly that pesticides pose a major societal concern. Scientists repeatedly warn about the far-reaching impacts of pesticide use on our environment, biodiversity and human health.** <sup>5</sup> **There is a very widely-carried demand for ambitious reduction in pesticide use and risk. Ensuring availability of digital pesticide data is an essential duty of the Commission and Member States.**

Given the above, any delay in digital record-keeping of pesticides should be avoided.

Thank you very much for your time and consideration.

Sincerely,

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<sup>4</sup> [Citizens' Demands for Pesticide Reduction in Europe](#)

<sup>5</sup> [How pesticides impact human health and ecosystems in Europe](#), [The impact of pesticides on people's Health](#), [The impact of pesticides on biodiversity](#)

[Scientists support the EU's Green Deal and reject the unjustified argumentation against the Sustainable Use Regulation and the Nature Restoration Law](#)