COM proposals, improvements

- Substitution of most harmful pesticides
- Safeners, synergists and co-formulants regulated
- End of provisional authorisations
- Cumulative and synergistic effects mentioned
- National Action Plans obligatory
COM proposals, problems not solved

**COM-regulation:**
- Criteria for approval highly insufficient
- Proper use not defined (like IPM as a basis)
- Comitology (essential uses, relevancy of metabolites)
- Approval by one representative use
- “Unless” in Uniform Principles

**COM-Directive:**
- Targets and timetables missing
- Crop-specific IPM standards voluntary
- Pesticide taxes or levies missing
- No ban on aerial spraying
COM proposals, even steps back

- Zonal authorisation
  (and mutual recognition)

- Extra loopholes, like
  - minor uses and,
  - “danger to plant health (120 days)” provision
  - data gaps sometimes acceptable