

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**