



Council of the European Union  
General Secretariat

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**WK 8636/2020 ADD 10**

**LIMITE**

**AGRI  
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**WORKING PAPER**

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**CONTRIBUTION**

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From:	General Secretariat of the Council
To:	Working Party on Agricultural Questions (Pesticides/Plant Protection Products)
N° prev. doc.:	ST 8238/20 + ADD 1
Subject:	Council Conclusions on the REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL On the experience gained by Member States on the implementation of national targets established in their National Action Plans and on progress in the implementation of Directive 2009/128/EC on the sustainable use of pesticides - Examination on the draft Council Conclusions - NL comments

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Delegations will find attached NL comments on the subject above.

*Delegations are invited to send written comments on both draft council conclusions (separately) until October the 9th 2020 to 713@bmel.bund.de, 313@bmel.bund.de, life.3@consilium.europa.eu*

The Netherlands (NL) wants to thank the German presidency for their work in drafting Council Conclusions and taken on board some of our comments sent on August 21.

Please find enclosed some further comments of NL on the draft council conclusion on the 2<sup>nd</sup> report of the European Commission on the implementation of the Sustainable Use Directive (EC) 2009/128. Partly these comments are text-suggestions (deletions marked by ~~xxxxxx~~, new text in **bold**) in line with comments made during the videoconference on the 18<sup>th</sup> of September.

Further comments could be submitted during the course of discussing draft Council Conclusions in coming council working parties and/or attaché meetings.

#### Comments on draft council conclusions (WK 8636/2020 INIT)

##### *Integrated Pest Management*

10. STRESSES that incorporating alternative methods and technologies on farm level also requires adaptation, adequate investment and demonstration that further changing practices **must be economic feasible** ~~does not lead to an increased economic burden~~ for farmers. In this context UNDERLINES that for an improved implementation of IPM it is necessary to put more effort in training of stakeholders and in advising farmers to consider alternatives for plant protection other than plant protection products.

##### **Harmonised risk indicators**

14. RECOGNISES that the Commission has established harmonised risk indicators which have achieved ~~broad~~ support from the MS **as starting point for indicators (alternative text: as initial indicators)**. However, POINTS OUT the difficulty to draw robust conclusions from them concerning how a MS is performing in relation to reducing reliance or dependence on chemical PPPs and reducing the risk associated with PPP use as required by the SUD and strongly RECOMMENDS ~~to consider~~ further work in this area.

##### **Approval of Active Substances**

16. SUPPORTS the Commission's conclusions regarding the need to accelerate the procedures for placing low-risk PPPs on the market. This should broaden the range of available low-risk substances as well as basic substances and thereby reduce farmers' dependency on the more hazardous active substances. However, EMPHASISES that the acceleration of approvals should not result in less **safety standards** ~~through risk assessments~~ with regard to possible effects of substances for health and environment.