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LIMITE

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WORKING PAPER

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CONTRIBUTION

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 - SE comments

Delegations will find attached SE comments on the subject above.

First Draft for 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.

THE COUNCIL OF THE EUROPEAN UNION,

RECALLING:

- The communication from the Commission of 11 December 2019 „The European Green Deal“¹;
- The communication from the Commission of 20 May 2020 to the European parliament, the Council, the European Economic and Social Committee and the Committee of the Regions “A Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system“²;
- The communication from the Commission of 20 May 2020 to the European parliament, the Council, the European Economic and Social Committee and the Committee of the Regions “EU Biodiversity Strategy for 2030, Bringing nature back to our lives“³;
- Directive 2009/128/EC of the European Parliament and of the Council of 21 October 2009 establishing a framework for Community action to achieve the sustainable use of pesticides;⁴

1. WELCOMES 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 (SUD).

2. AGREES with the Commission, that the EU pesticide legislation provides for one of the most stringent system in the world for authorising and controlling the use of pesticides, and RECOGNISING that pesticides may involve risks and hazards for humans, animals and the environment. | 2 bis. AGREES with the Commission that the implementation of the SUD must be strengthened, especially regarding the National Action Plans and the use of Integrated Pest Management.

Commented [ER1]: Sweden welcomes the draft Council conclusions. Sweden is positive to the intention of the Commission to revise the directive in order to strengthen its implementation, especially with regard to integrated pest management.

Commented [ER2]: Add reference to council conclusions on chemicals from June 2019 “Towards a Sustainable Chemicals Policy Strategy of the Union” and council conclusions on the ECA special report on sustainable use of plant protection products

Commented [ER3]: Suggest adding in order to also reflect the risks pesticides may involve. The reason we have one of the most stringent systems is that pesticides involves risks on human, animals and environment.

Commented [ER4]: Suggest adding in order to clarify that we agree with the report.

¹ [COM\(2019\) 640 final](#)

² [COM\(2020\) 381 final](#)

³ [COM\(2020\) 380 final](#)

⁴ ABI. L. 309, 24.11.2009 p.71

Field Code Changed

Field Code Changed

Field Code Changed

Implementation of the Directive and National Action Plans

~~2.3.~~ SUPPORTS the concept of National Action Plans, which contributes to the implementation of the SUD, but STRESSES that it should be taken into account that Member States (MS) were not starting from the same position with regard to the structures in place and existing requirements, ~~proving it to be difficult for some MS to achieve all objectives in the initial plan period.~~

~~3.~~ REAFFIRMS that it is very important to take the variation in agriculture and farm structure across the EU better into account and recognise the challenges the Member States are facing based on their particular circumstances when considering the development of National Action Plans~~implementation of the SUD.~~

5. REMINDS that the findings of the Commission on the National Action Plans do not give a complete overview of all measures and policies in MS concerning the sustainable use of plant protection products (PPPs), reducing risks and the application of the principles of IPM but STRESSES that often additional policies and measures, strongly related to the SUD, should also be taken into account.

6. ENCOURAGES the Commission to work in good cooperation with the MS regarding the implementation of the SUD.

UNDERLINES the necessity of an impact assessment, before revising the SUD against the background of the Green deal farm to fork strategy and the future common agricultural policy

Integrated Pest Management

7. WELCOMES the Commission's consideration of Integrated Pest Management (IPM) as one of the cornerstones of the SUD, AGREES that IPM ~~in general poses~~ one of the biggest challenges of the implementation of the SUD and that it needs more attention by the MS.

8. However, STRESSES that the variation in climate, agriculture and farm structure experienced in the MS, is considerable. Therefore, POINTS OUT that it may be challenging to harmonise IPM across all crops and all MS hence SUGGESTS to establish crop specific guidelines in each MS.

9. ACKNOWLEDGES the Commission's identification of low-risk PPPs, pest monitoring systems, financial supports, and non-chemical control methods as important areas in terms of improving implementation of the IPM principles and UNDERLINES that in practice some farmers already reduce the risk from plant protection products through preventive,

Commented [ER5]: Suggest deleting, we think it is enough stressing that we are not starting from same position.

Commented [ER6]: Such considerations can be made in the development of NAP.

Commented [ER7]: By referencing the Green deal, all relevant strategies are included.

Commented [ER8]: Superfluous as this is part of Green deal.

non-chemical, measures - in crop rotation, through choice of plot, tillage techniques, choice of plant variety etc. as part of normal farming practices.

10. STRESSES that incorporating alternative methods and technologies on farm level also requires adaptation; and adequate investment and demonstration that further changing practices does should not lead to an disproportionate 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.
11. In addition, REAFFIRMS that the farmer's economic interests and the security of food production should be adequately taken into account in general.
12. POINTS OUT that translating IPM principles into controllable criteria represents a challenge for which Member States need the support of the Commission and HIGHLIGHTS that IPM is to a certain extent already part of today's farming and as such difficult to measure separately.

Commented [ER9]: Suggest revising, we are also open to changes in similar direction.

Commented [ER10]: Suggest deleting, unclear what is intended.

Research and Innovation

13. RECOMMENDS targeted research and development being fostered by MS and the Commission especially in the area of IPM and UNDERLINES the importance of primary research in the area of agronomic practices (non-chemical), new methods, equipment and information systems for the transfer of knowledge and experience into practice, on measuring impacts of various cropping practices on subsequent crops and on the potential of developments in plant breeding.

Harmonised risk indicators

14. RECOGNISES that the Commission has established harmonised risk indicators which have achieved broad support from the MS. 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.
15. REAFFIRMS that the indicators must accurately reflect the risks arising from the use of PPPs by taking into account the inherent properties when calculating the harmonised risk indicators. by carrying greater weight of PPPs in the calculation that might have a considerable impact to health and the environment and STRESSES the relevance of a larger impact on the scores by the use of the lowest risk substances.

Commented [ER11]: We suggest other wording to facilitate understanding.

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 thorough risk assessments with regard to possible effects of substances for health and environment.

Better Training for Safer Food

17. HIGHLIGHTS the Better Training for Safer Food (BTSF) training courses in general as useful tools for the sharing of ideas and evaluation of attitudes across the MS and NOTES the benefits for regulators to learn what other MS are doing to address certain issues or what they are doing to develop national sustainable use of PPP strategies.

SUD Working Group and SUD Web Portal

18. SUPPORTS the SUD working group as useful mechanism to share ideas and give progress reports to the Commission and the web portal that is a useful repository for information.