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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 - FI comments

Delegations will find attached FI comments on the subject above.

FI comments on the

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.

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.

FI wants to highlight that the piece of legislation is a directive, to enable MS some freedom in the implementation. This should be recognized and taken into account when assessing the work of the MS.

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 farm to fork strategy and the future common agricultural policy

FI wants to stress the quality of the impact assessment.

Integrated Pest Management

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.

FI would like to emphasize that IPM is very site specific. Crop specific guidelines are supported, but they cannot be made for the whole EU and they might not even be possible to make for a certain MS, as they need to take into account local conditions. That is why we ask for the right of a MS to decide on how these should be drawn up to best fit the local circumstances.

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 farmers already reduce the risk from plant protection products through preventive, 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, adequate investment and demonstration that further changing practices 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.

11. In addition, REAFFIRMS that the farmer's economic interests and the security of food production should be adequately taken into account in general.

Points 9 - 11 are strongly supported.

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.

The proposed text is supported. After discussing the issue of controlling or measuring the IPM uptake with researchers in the field, FI wants to stress that there is still no mutual understanding or agreement among researchers on how this should be done. What would a reasonable measurement be? Would it be quantitative or qualitative? At this point, we recommend investing in research and in training and information to communicate the mission of IPM to farmers and other PPP users.

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.

FI also considers the BTSF training courses as useful. We would however, like to stress the importance of the effectiveness of the courses, and the possibility to adapt the courses during the campaign. It is important to observe the results of the work – do we get our message through?