



Council of the European Union
General Secretariat

Brussels, 09 October 2020

WK 8636/2020 ADD 5

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 - LV comments

Delegations will find attached LV comments on the subject above.

LATVIA comments on

First Draft for COUNCIL CONCLUSIONS WK 8636/20 INIT (14 September 2020) 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

Latvia acknowledges the efforts of the European Commission in evaluating the implementation progress of Directive 2009/128/EC on the sustainable use of pesticides (SUD), and thanks the Presidency of the Council of the European Union for the opportunity to comment on the draft Council conclusions.

Implementation of the Directive and National Action Plans

With increasing plant health threats due to globalisation of trade and climate change, plant protection products (PPPs) prevail as an important phytosanitary measure that MS apply and are even obliged to do so according to Regulation (EU) 2016/2031 on protective measures against pests of plants, which establishes rules to determine the phytosanitary risks and measures to reduce those risks to an acceptable level. We share the view that further action must be taken to reduce the risks and dependency on PPP use, however policies and targets cannot be set separately from plant health issues and policies on agricultural production and international trade.

Therefore Latvia strongly supports the sentence after point 6 of the draft Council conclusions with amendments proposed by the Polish delegation:

“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. This impact assessment should encompass not only benefits for environment but also inter alia threats posed by climate changes and spread of new pests, competitiveness of European agriculture, food security and food safety.”

Research and Innovation

Integrated Pest Management (IPM) requires considerable research support and funding. National and the EU level research activities are needed on plant breeding, non-chemical agronomic practices, impact of various cropping practices on subsequent crops. We would particularly like to emphasize the need for research on currently lacking effective non-chemical control measures. It is also necessary to increase focus on the development and use of precision farming in the IPM implementation.

In the Report to the European Parliament and Council, the European Commission mentions many research examples on IPM. Unfortunately, a clear overview of results of all the EU financed research activities has been lacking, therefore limiting their widespread practical application.

Therefore, Latvia supports point 3 of the draft Council conclusions and proposes additional point under this section:

“(…) EMPHASIZES the necessity to facilitate at the EU level the collection and compilation of results of research projects on sustainable plant protection to promote widespread application.”

Harmonised risk indicators (HRI)

We are concerned that despite the inherent flaws of the recently developed HRI, they have been used for drawing conclusions of this Report, and proposed as a tool to assess the MS progress in achieving the PPP targets of Farm to Fork strategy.

The current HRI are purely hazard based and are dismissing the various farming structures and trends across European Union. This is particularly unfair to the Member States with relatively low baseline for PPP use, where utilised agricultural land is expanding, accompanied by a rise in total PPP sales volume (related to HRI1) which does not necessarily translate into increasing risks. In fact, a lot of risk reduction measures implemented by MS can not be reflected in hazard based HRI values at all. HRI2 is even more distantly related to the use of PPPs as it merely reflects the number of permits issued. From national experience, these are usually small-scale uses without a market to justify PPP authorisation.

HRI were established to measure the trend of risk arising from PPP use. Yet, currently there are no statistical data of PPP use at the EU level. Therefore, priority should be given to collection of such data in harmonised and comparable way. Furthermore, we believe that policy indicators should have broader perspective and take into account plant health and socioeconomic data. One can set quantitative PPP reduction targets, but the need for effective plant protection tools to secure the EU food production will remain.

In the Report, the European Commission commits on developing further harmonised risk indicators. In fact, the several of the Member States, which supported the adoption of the current risk indicators called for development of fitter for purpose risk indicators in the future.

To reflect the considerations mentioned above Latvia proposes the following amendments to points 14 and 15 of the draft Council conclusions.

- “(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 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~~ **and for that matter STRESSES the need to gather and incorporate in the calculation the data on PPP use intensity in various crops and risk reduction measures taken by the MS.”**