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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 - PL comments

Delegations will find attached PL comments on the subject above.



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The Presidency of the Council of the European Union

-via e-mail only-

Having regard to *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* and discussion during the informal video conferences on July, the 22nd and September the 18th Poland would like to emphasize that the pesticide risk reduction cannot be understood as equal to the use reduction. The goal of the Directive 2009/128/EC is according to the Article 1 *to achieve a sustainable use of pesticides by reducing the risks and impacts of pesticide use on human health and the environment (...)*. Poland understands that ambitious targets related to IPM and the reduction of the use of plant protection products should be set up, but such goals should also be feasible, justified and proportionate.

The aim of Directive 2009/128/EC is also *promoting the use of integrated pest management and of alternative approaches or techniques such as non-chemical alternatives to pesticides*. However IPM is a flexible system and should consider specific farm conditions, as well as farmer's economic interests. Due to what was mentioned above it is difficult to translate IPM principles into simple controllable criteria.

Moreover Poland would like to mention, that harmonized risk indicators do not consider all risk reduction measures (such measures as buffer zones, drift reduction technologies do not have any influence on the calculation of risk indicators). Harmonized risk indicators do not reflect properly efforts taken by Member States to reduce risk of pesticides.

Therefore, Poland supports current wording of points 11, 12, 14 and 15 of draft Council conclusions (WK 9534/2020INIT, 15 September 2020). Poland supports also sentence added after point 6, however propose to modify this statement as follows:

“**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.**”.

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