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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 - SK comments

Delegations will find attached comments from SK on the subject above.

SK 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.

The Slovak Republic welcomes the draft of Council conclusion prepared by DE PRES and our comments are as follows:

1. National Action Plans

National Action Plans reflect on different starting point in individual member states and there is no standardized format for its elaboration. So different approach through all countries is logical.

Revision of SUD is needed but there are some areas which are still „open“, e.g. monitoring of chronic poisoning, strategic guidance document on monitoring and surveying of impacts of pesticide use on human health and the environment (doesn't finished and approved). Before going to the next steps impact assessment is crucial, and 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.

Therefore we support DK comment to point 3, FI comment to point 5 and PL comment to point 6.

2. IPM

Some basic principles of IPM are already general standards of good farming practice. However there is still area for improvement and qualified and independent advisory system is important tool how to gain relevant information and exchange experience. On the other hand, increasing plant health threats (new pests, known pests in „new“ plants, quarantine pests), the variation in climate, agriculture and farm structure in individual the MS is considerable. There are variations in IPM tools across all crops and all MS and therefore the elaboration of crop specific guidelines in each MS is the most pragmatic way best fit local circumstances.

Therefore we support the text proposed by PT in points 8, 9, 10, 11, 12.

3. Research and Innovation

We support to add, that overview of results of all the EU financed research activities is needed with aim of their widespread practical application, in line with wording proposed by LV.

4. HRIs

LV and DK comments are fully supported.

HRIs were established on the base of sale of PPPs, which doesn't reflect on of risk arising from PPP use. There are no harmonized statistical data of PPP use at the EU level and there is no harmonized approach in collection of data on PPPs containing microorganism as active substances. Therefore revision of Reg. 1185/2009 is essential for collection of relevant data and setting appropriate baseline taking into account all progress in the previous steps, retroactively reassessing the indicator scores of MS when the approval status of active substances change is not reasonable approach and should be removed.

5. BTSF

SK welcomes continuation in trainings, but some improvement in efficiency is needed and more practical outcomes should be applied.