

Directive 2009/128/EC on sustainable use of pesticides and its Implementation

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- SUD Implementation timelines
- Current status of national implementation of the Framework Directive
- Industry view on National Action Plan & key provisions
 - Key provisions from article 4
 - Indicators
 - Integrated Pest Management
 - Links between NAP and CAP Cross-compliance
 - Conclusions

SUD - Implementation timeline reminder

Directive 128/2009 Implementation Timeline	Issues
By 26 November 2011	<p>Entry into force of National laws, regulations and administrative provisions to Implement SU DIR (if not specified otherwise)</p> <ul style="list-style-type: none"> - Measures to ensure risk or use reduction in public areas - Certificate system for equipment inspection
By 26 November 2012	<p>Communication of NAPs by MS to the Commission</p> <p>MS to determine penalties applicable to infringement of national provisions adopted – LINK TO CROSS COMPLIANCE</p> <p>Commission and MS to develop strategic guidance document on surveying impacts of pesticides</p>
As from 2013	<p>MS to ensure that aircraft are equipped with best available technology</p>
By 30 June 2013	<p>MS to report on measures taken to promote low pesticide input pest management/IPM/organic & in particular on establishment of necessary conditions for IPM implementation</p>

SUD - Implementation timeline reminder

Directive 128/2009 Implementation Timeline	Issues
By 26 November 2013	Establishment of training certificate systems for prof. users, distributors & advisors
By 1st January 2014	MS to report (in NAPs) on how it is ensured that IPM is implemented by all professional users by 1.1.2014
By 26 November 2014	Submission of Report by Commission to EP and CS on NAPs content
By 26 November 2015	Distributor 1 staff to be trained. Training implemented Restriction of sales of products for professional use to professional users holding a certificate
By 26 November 2016	Ms to ensure that all (despite exemptions) equipment to be inspected at least once. Only inspected equipment to be in professional use
2017	(first) Review of NAP by MS
By 26 November 2018	Report by the Commission to EP and Council on the national experience with national targets. Accompanied, if necessary, by legislative proposals



Overview of NAP availability (September 2010)



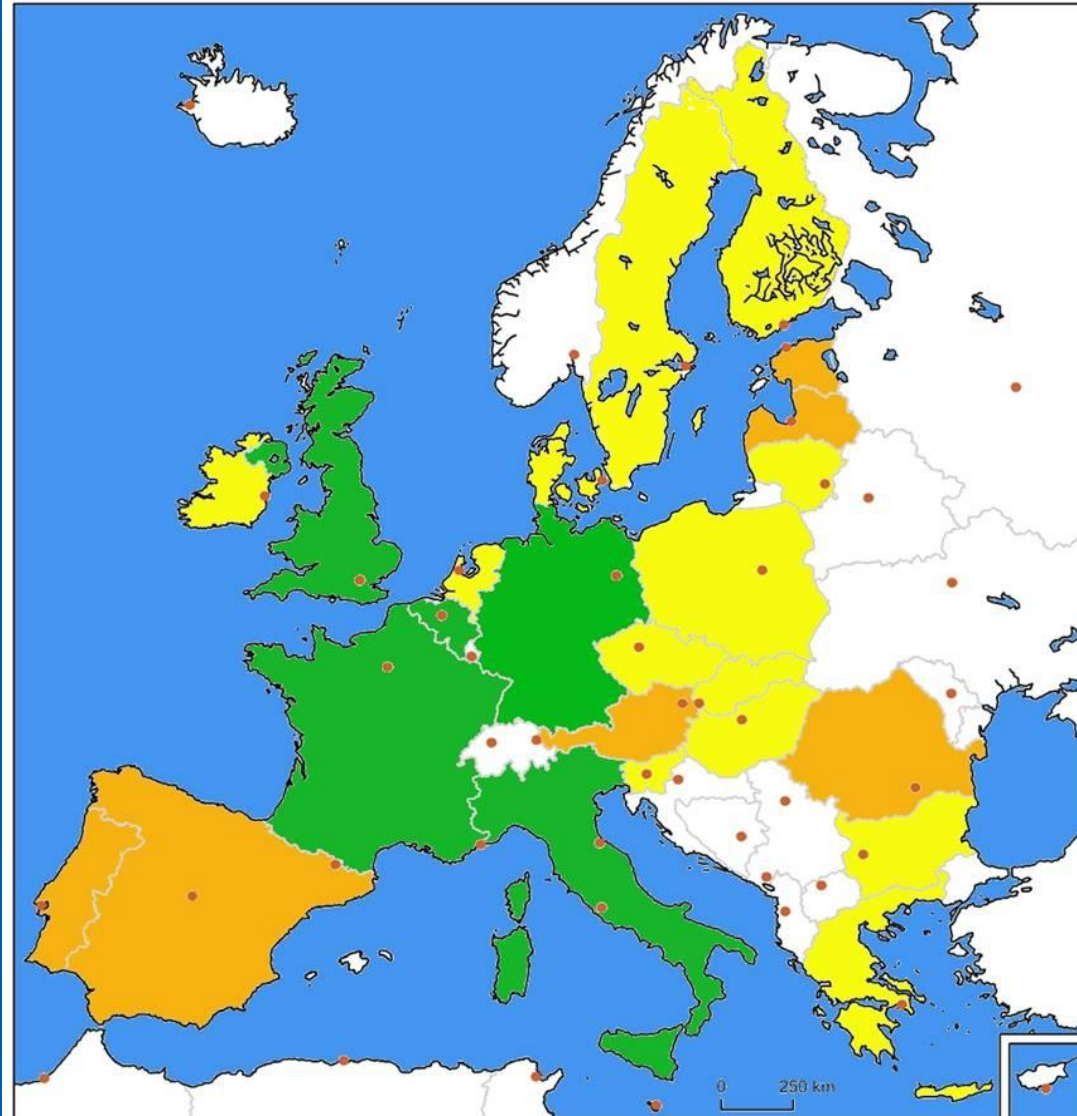
Member States with
already a draft or finalised
version



Release expected in 2010



No indicative date for a
release



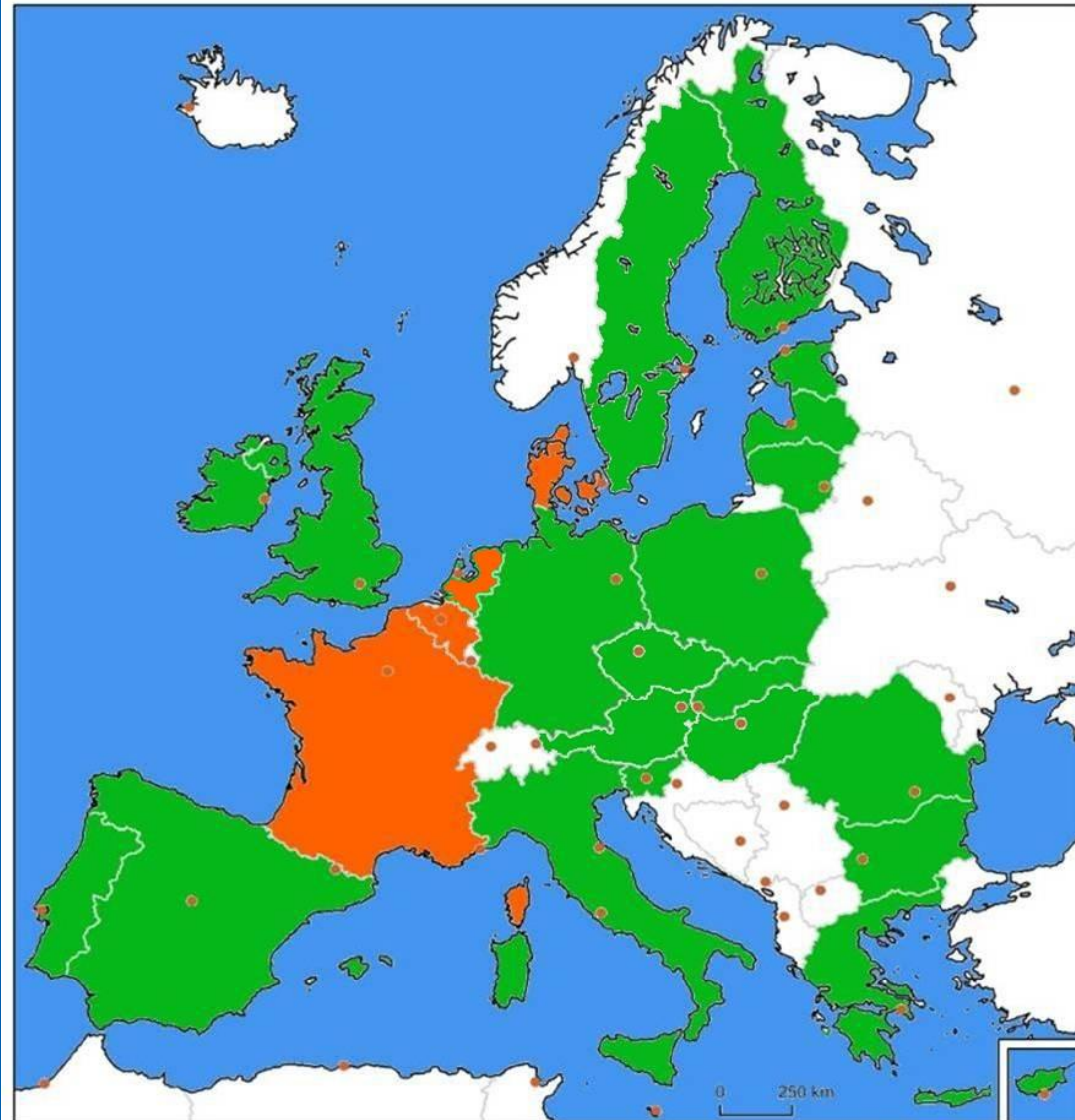
Member States focus on Risks and/or Use reduction

**Mainly on
 risks
 reduction:**

Austria	Latvia
Cyprus	Lithuania
Czech Republic	Luxemburg
Bulgaria	Malta
Estonia	Portugal
Finland	Poland
Germany	Romania
Greece	Slovakia
Hungary	Slovenia
Ireland	Spain
Italy	Sweden
	UK

**Combination
 of both:**

Denmark (focus use)
 France
 Belgium
 Netherlands





■ National Action Plans

- Overall goal of Framework Directive → Sustainable Use
- Focus of NAP should be on achieving the sustainable use of PPPs - in line with the overall goal of the Framework Directive (Art.1)
- Focus on use phase of plant protection products.
- No duplication: Registration process is already covering substance/product related assessments – only products fulfilling the registration requirements can be used
- NAP to be a descriptive document outlining the MS policy and describing the goals and measures to achieve sustainable use

National Action Plan – Industry view

- NAPs to comprise objectives, targets, measures and timetables
 - Freedom for MS to choose most appropriate objectives, targets, measures and timelines
 - Different areas may be covered – prioritisation possible
 - Focus on measures that will deliver the greatest benefit towards achieving the sustainable use of PPPs.
 - Ensuring responsible use and improving use practices – key!
 - Training of professional users, distributors and advisors
 - Anti-counterfeiting measures
 - Ensuring use of personal protective equipment (PPE)
 - Enhancing use of spray drift reduction nozzles
 - Progress can be measured by respective indicators

- **NAPs to comprise indicators, MS can adopt indicators**
 - Indicators needed to measure progress towards achieving the goals of the Directive : i.e. sustainable use of PPPs
 - Sustainability concept comprises three components: environmental, social and economical aspects – indicators need to cover all three elements
 - MS Government need to be able to:
 - Demonstrate progress being made at national level
 - Be able to verify that the most appropriate measures towards SU have been taken
 - Indicators need to be:
 - Relevant
 - Comparable over time and areas
 - Feasible/Practical and cost efficient, incl. data availability
 - Understandable

Suitable indicators – Industry view

- Examples of suitable indicators (environmental and social):
 - Number of farmers/distributors/advisors holding plant protection expertise certificates
 - Agricultural production area covered by trained certificate holders
 - Number of holdings/farmers using remnant purification systems
 - Use of spray drift reduction nozzles
 - Number of farmers using PPE: gloves, glasses, coveralls,...
 - Prevention of use of illegal/counterfeited PP Products
 - Number of equipment passing the inspection
 - Expansion of modern machinery in use
 - IPM/ICM implementation rate
 - Number of Rapid Alerts (RASFF) leading to food produce withdrawal from the market

Suitable indicators – Industry view

- Suitable indicators (economical):
 - Harvested yield and quality
 - Agricultural productivity
 - Costs per ha, income per ha, margins/ha
 - Resource efficiency per output unit

- Additional indicators needed, such as:
 - Weather conditions data
 - Land use changes
 - Number of solutions available for specific pest/disease
 - Import & exports of agricultural produce
 - Pest & disease pressure during the growing season

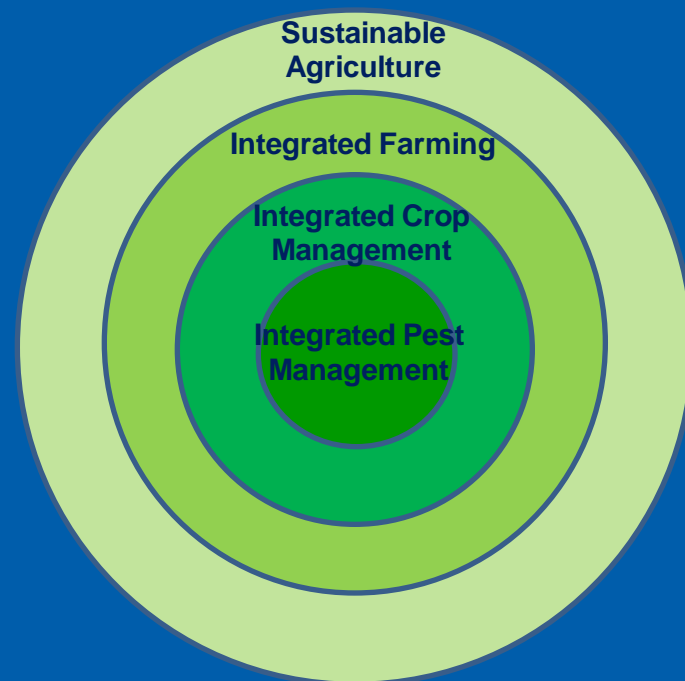
- **NAPs to include indicators to monitor use of PPP containing active substances of particular concern**

- With attention to substances, which will not fulfill criteria set in Regulation 1107/2009, Annex 3.6-3.8 (i .e. cut-offs) when subject to renewal. Establish targets for these specific substances.
 - Registration process is covering all the substance related risk assessment
 - Only those active substances/respectively products fulfilling the stringent registration requirements can be used and are considered safe for use !
 - Regarding the substances of particular concern: Substances first need to be evaluated before any conclusions can be drawn on their fulfillment/non fulfillment of the approval criteria
 - Only once impact of Regulation 1107/2009 is known, any discussion on potential targets can take place
 - Keep in mind: use reduction only if considered as appropriate means of risk reduction.

Integrated Pest Management – Industry view

The implementation of IPM offers a lot of opportunities to fulfil the goals of the SUD

- IPM needs to be implemented as a holistic concept
- Applied research is needed that proves practical on the ground & also economically viable
- Training, advisory and extension services needed
- Collaborative approach of agricultural stakeholders required to gain commitment for the practical implementation



Perspective of partners in the food value chain

- Joint Position on IPM developed by ECPA, CELCAA, COCERAL, COPA-COGECA, FRESHFEL, PIP and AREFLH

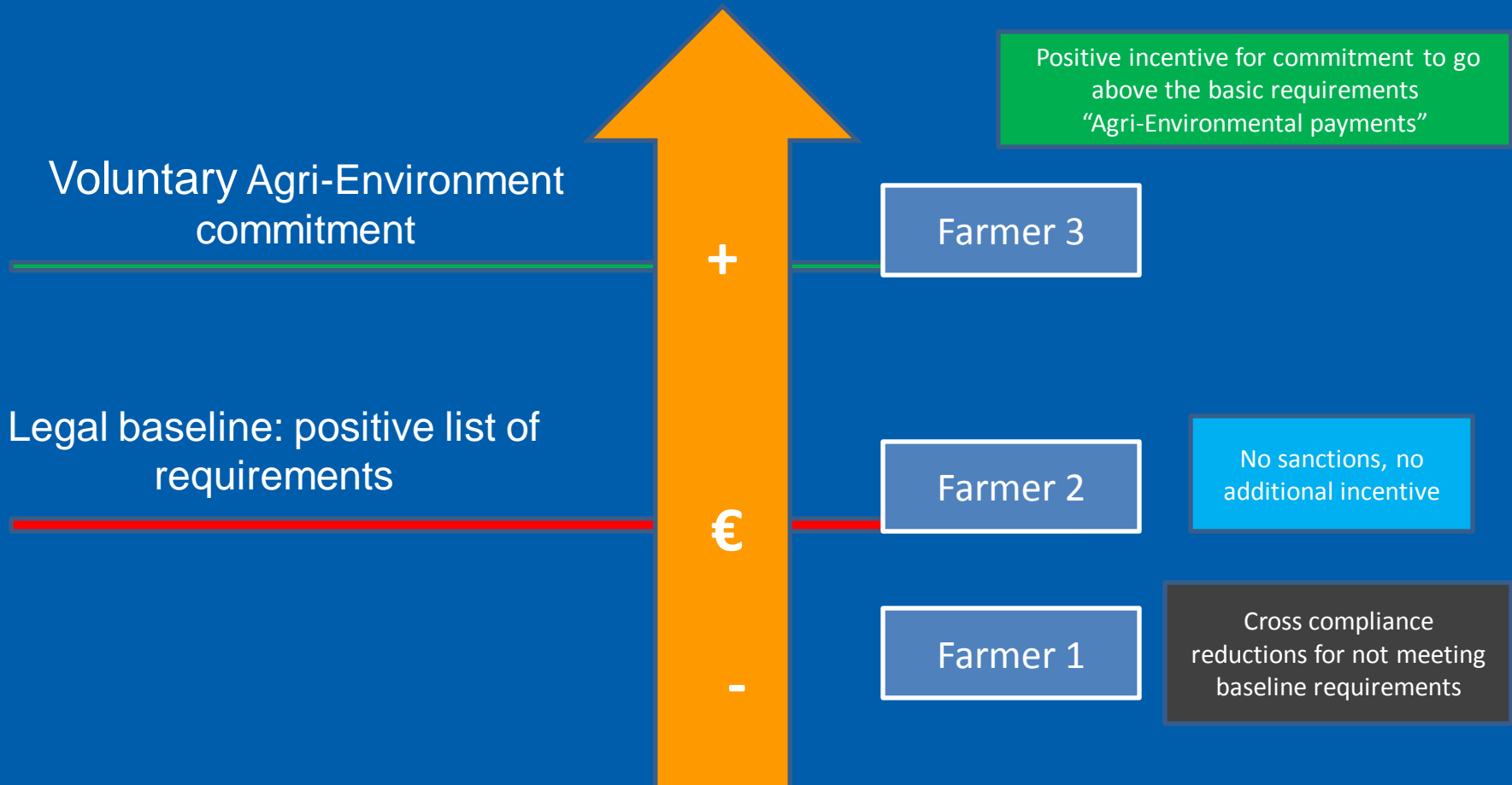


SUD – link with CAP Cross compliance

- Via Regulation 1107/2009, Art 83 link to CAP Regulation 1782/2003 (now 73/2009)- cross compliance rules,
- Article 83 of 1107/2009 states: References to Art. 3 of 91/414 in Annex II of 1782/2003 (cross compliance requirements) shall be construed as reference to Art 55 (of 1107/2009)
- New Art. 55 (of 1107/2009) = wider scope: Proper PPP use shall include: GAP incl. labelling, compliance with SUD Directive provisions & in particular the principles of IPM
- Commission DG AGRI: internal discussion on cross compliance - its practical implementation
 - Any cross compliance provision needs a clear legal requirements for farmers
 - Await MS transposition – what legal requirements for farmers?

Cross Compliance – Payments to farmers

Each farmer receives direct payments that can be affected up or down:



SUD Implementation – Conclusions

- Plant health and the sustainable use of PPP need to be seen in the wider context of sustainable agriculture
- Focus needs to be on ensuring sustainable use & respective indicators; not on minimising the available solutions in order to ensure plant health and sustainable production in Europe
- Improvement of practices is the way forward!
- The implementation of IPM as a holistic concept offers a lot of opportunities to fulfil the goals of the SUD



SUD Implementation – Conclusions



- Duplication needs to be avoided and existing legislation to be taken into account.

- Continuous involvement of agricultural stakeholders is necessary



- However, if national implementation is focussed on further restrictions/reduction of the use of PPPs, instead of sustainable use, the overall goal of the Directive is not achieved and plant health & sustainable agricultural production may be endangered

Thank you for your attention!