



Directive 2009/128

Industry feedback

Aurélie Dhaussy

CEUREG, 10th October 2016

Issues

- ▶ Sustainable Use
- ▶ Amateur uses
- ▶ Industry initiatives



Sustainable use Directive 2009/128

ECPA view

Focus on the use phase of Plant Protection Products

- No duplication: Registration process is already covering substance/product assessments
- Multi-stakeholder approaches are important
- ECPA is committed to progress and implement realistic and practical measures for sustainable use

Knowledge-sharing on IPM is key

- Farmers must have the most up-to-date information to support efficient decision-making
- Industry has a lot of experiences and expertise & is committed to further enhancing its sustainability initiatives

Amateur uses

- ▶ More MSs now asking for arbitrary use reduction or total ban of chemicals for amateur users based on hazard and without considering the real risk
 - Risk Assessments used should be based on real risk scenarios
- ▶ Without adequate and efficient solutions, end users rely on illegal uses
 - Use of unauthorised PPPs (e.g. for professional use or online purchase)
 - Use of unsuitable solutions (e.g. bleach, gasoline, home made recipes)
- ▶ Stewardship towards less risk product is possible but requires innovation
 - Constant progress: better target pests & prevent emissions into environment
 - Use patterns similar in many MSs: opportunities for harmonised requirements
- Garden products are available with low hazard and give limited risks
- Producers can help but innovation and development take time
- Possible Guidance Document get predictable registration requirements?

Industry Sustainability Initiatives



Container Management Systems Safe & Sustainable Use Initiative





Residues management project



Water Protection

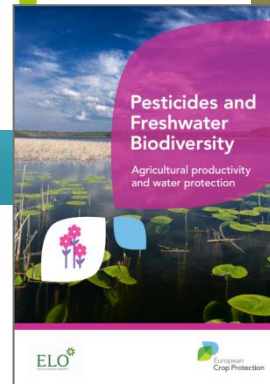


PROWADIS

Analytical Standards for Water




Biodiversity INSPIA





Thank you