



What is the farmer's EU perspective? Copa-Cogeca's standpoint

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Inspection of Sprayers in Europe – SPISE 5 | 15/10/2014

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General overview

- Regulatory framework
- Main current challenges

Regulatory framework

- Regulation 396/2005
- Regulation 1107/2009
- Directive 2009/128/EC
- Regulation 1306/2013
- Proposal for regulation against pests of plants (2013)
- EC report on minor uses (2014)

Farmer's perspective

- National Action Plans
- Training
- Systematic data collection
- Information and awareness
- Application equipment
- Specific measures
- Integrated Pest Management
- Cross-Compliance
- Maximum Residue Level

Conclusions



General overview

General overview

Regulatory framework

- Regulation 396/2005 on Maximum Residue Levels of PPPs
- Regulation 1107/2009 concerning plant protection products (PPP)
- Directive 2009/128/EC “Sustainable Use Directive”
- Regulation 1306/2013 on horizontal regulation of the CAP
- Proposal for a regulation on protective measures against pests of plants (2013)
- Report from EC on minor uses in the field of PPP (2014)

General overview

Main current challenges

- Active substances at EU level (Reg 1107/2009 on PPP) :
 - Authorisation procedure
 - Candidates for substitution
- National authorisations : Lack of a common level playing field
 - Authorisation procedure
 - National Action Plans - MRL
- Minor Uses and Specialty Crops
 - Lack of research and investments
 - Lack of harmonization across MS



Regulatory framework



Regulatory framework

- Regulation 396/2005 on Maximum Residue Levels of PPPs
 - Fixing of maximum levels for pesticide residues in and on fruit and vegetables
- Regulation 1107/2009 concerning plant protection products (PPP)
 - Active substances (AS) authorisation at EU level / product authorisation at national level → differences among Member States
 - List of candidates for substitution (AS) → less availability of choices at farm level
 - Lack of PPP and lack of harmonization → problems with minor uses and specialty crops

Regulatory framework

- Directive 2009/128/EC “Sustainable Use Directive”
 - National Actions Plans (NAP) :
 - 14/12/2012 : Member States shall communicate their NAP
 - 14/12/2014 : European Commission’s report on NAP
 - 14/12/2018 : European Commission’s report + appropriate legislative tools
 - Integrated Pest Management at farm level (January 2014)

Regulatory framework

- Regulation 1306/2013 on horizontal regulation of the CAP
 - Farm advisory system → compliance with IPM general principles
 - Joint statement by the European Parliament and the Council on cross-compliance → “(...) *with a view to including the relevant parts of these Directives [Water Directive and Sustainable Use Directive] in the system of cross-compliance (...)*”

Regulatory framework

- Proposal for a regulation on protective measures against pests of plants (2013)
 - Categorisation of pests and compensation for disinfecting machinery and equipment (emergency measures)
- Report from EC on minor uses in the field of PPP (2014)
 - Establishment of a coordination platform → still lack of research and cost effective solutions



**Directive 2009/128/EC
“Sustainable Use Directive” :
Farmer’s perspective**

Directive 2009/128/EC “Sustainable Use Directive”

NATIONAL ACTION PLANS (NAP)

- Focus on risk reduction (not volume reduction)
- Basic training has to be accessible to all professional users

TRAINING

- Basic training and continued information is crucial for everyone applying PPPs, including farmers
- Several farmers’ unions and cooperatives are already involved in such programmes and in some Member States there is already a legislative framework in place

Directive 2009/128/EC “Sustainable Use Directive”

SYSTEMATIC DATA COLLECTION ON USE OF PPPs

- Record keeping of PPP use at farm level: what, where, when and how much PPP

INFORMATION AND AWARENESS-RAISING

- Information must be objective, balanced and science-based
- Also include messages about why PPPs are used and what their benefits are

Directive 2009/128/EC “Sustainable Use Directive”

PESTICIDE APPLICATION EQUIPMENT

- It is essential that equipment used for spraying agrochemicals is inspected on a regular basis, whether by the farmer themselves (or their staff) or at a special station
- Putting new application equipment and technology into practice for reducing spray drift and PPP use should be given particular support

SPECIFIC MEASURES TO PROTECT AQUATIC ENVIRONMENT AND DRINKING WATER

- Extra precautions or restrictions on the use of PPPs must be justified and farmers need to be compensated

Directive 2009/128/EC “Sustainable Use Directive”

INTEGRATED PEST MANAGEMENT

- We must accept that the market is looking for zero tolerance in the interest of product quality and safety
- Several options (chemicals, biological, mechanical) are needed within multiple modes of action
- Good implementation goes beyond farmers’ responsibility (e.g. early warning systems, database of weather info)
- IPM is a flexible tool and can only be effective if the decision is made on the ground

Directive 2009/128/EC “Sustainable Use Directive”

CROSS-COMPLIANCE

- Way of implementation of IPM may be different across Member States. Any link to Cross-Compliance of direct payments (CAP) is rejected

MAXIMUM RESIDUE LEVELS (MRLs)

- Not to be defined at national level (NAP)
- Already covered by current legislation (doubling up of regulations should be avoided)



Conclusions



Conclusions

- Copa-Cogeca recognises sustainable growth as one of the future challenges for the European agriculture, that means, to ensure higher yields with better use of natural resources
- Implementation of Sustainable Use Directive at European Union level is being set up by the National Action Plans for Integrated Pest Management and will be one of the main points of the implementation of the Common Agriculture Policy 2014 – 2020.
- Implementation of SUD must be done in a realistic way

Conclusions

- European farmers and European agri-cooperatives are very committed to ensure a sustainable use of plant protection products together with clear principles of integrated pest management. There is a strong need of clear and science based definition of IPM.

Conclusions

- We fully support any action which :
 - implement mutual recognition and increase harmonization of every aspect of Plant Protection regulation
 - increase awareness of operators : education, training, information
 - increase the quality of equipment
 - limit any additional national requirements
 - simplify regulation : for strict and clear rules
- Europe, all Europe, Only Europe



Thanks for your attention

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