



Comments from Denmark on the draft report of a fact finding mission carried out in Denmark from 3-10 May 2017 regarding sustainable use of pesticides

Denmark received the English version of the draft report of the fact finding mission on 14 July 2017 and a Danish version on 31 August 2017. Below we have included our comments to the English version of the report followed by our comments to the Danish version. Our comments to the Danish version, is mainly suggestions for changes of the translation. If the English version will be amended due to our comments below, these amendments should of course also be included in the Danish version.

Comments to the English version

Executive summary

The last three lines of the summary reads:

"Finally, there is no system of monitoring or controls either at individual grower level or at a national level, to determine compliance with the eight principles of integrated pest management as described in Annex III of the Directive."

DK comments:

We suggest these lines are deleted in the summary.

It is correct that in Denmark we do not have a system in place by which we are able to monitor the compliance of IPM principles at individual grower level. The reason is that farmers may implement the IPM principles in many different ways and still be in compliance which makes it impossible to monitor. Also we do not agree that it is stated in Directive 2009/128/EC that such a monitoring is required.

However, we do monitor the IPM implementation at national level as explained below.

The requirement of Article 14(4) regarding how we will "ensure that the general principles of integrated pest management as set out in Annex III are implemented by all professional users by 1 January 2014" is in Denmark to a large extent based on the differentiated pesticide tax, which came into force in July 2013, and by which we make sure that a tax is levied on all authorised pesticides and that the level of the tax of the individual products depends on the intrinsic properties of the individual pesticides/active substances (their loads with respect to environment and health).

The purpose of the tax is to ensure, that the professional user will have an economic incentive to:

- Use preventive measures as sound crop rotation, preventive cultivation techniques, resistant cultivars, etc.
- Use monitoring and warning systems for a number of pests,
- Use alternative control methods,
- Use alternative pesticides with lower load on the environment and human health,
- Use reduced dosages of the authorized products.

Thereby the pesticide tax is the most important tool to ensure that the first 6 of the 8 IPM principles are met. Based on the calculation of the load of the pesticides we have developed an indicator (Pesticide Load Index) and by following this indicator, we monitor the compliance with the IPM principles at national level each year. The indicator allows us to monitor any trend in the load on environment and human health based on both the pesticide sales data and based on the pesticide use data. In the NAP a specific reduction target has been set. We regard this as a measure of monitoring the compliance with the IPM principles.

The Commission carried out an audit in Denmark 17-24 June 2014 (reported in DG (SANCO) 2014-7184 - MR FINAL) and raised during this audit the following question/recommendation, which Denmark was asked to follow up on: "10. *Ensure the implementation of IPM by professional users as required by Article 14(4) of Directive 2009/128/EC.*"

Denmark submitted comments to this recommendation, and the Commission reported back, that the answer was satisfactory. We are therefore surprised that this issue is now raised again.

Abbreviations

DAFA: Danish Agri-Fish Agency

Has recently been split into two agencies. One concerning agriculture and one concerning fisheries and the name of the relevant agency has changed to: Danish Agricultural Agency and the abbreviations in the abbreviation and in the whole report should probably be changed to DAA.

5.2 Competent authorities

Section 3

The Ministry of Education is responsible for all SUD related courses/training and the certification of operators.

Should be amended to:

The Ministry of Education is responsible for all SUD related courses/training and the certification of operators apart from education and certification of people using gas for the control of moles, for which the DEPA is responsible. The DEPA is responsible for the subsequent authorisation of all operators to sell, buy and use pesticides based on the certificate operators have acquired through training.

5.3 National Action Plan

Section 5

...a reduction of 50% in the volume of pesticides sales was achieved, ...

Should be amended to:

...a reduction of 50% in the amount of pesticide active ingredients sold was achieved, ...

Section 10

The current NAP noted ...

Should be amended to:

In the fifth NAP (covering the period 2013-2016) it was noted ...

Section 11

For calculating human health load, every risk phrase/hazard statement is converted to a score ranging from 10 to 100.

Should be amended to:

For calculating human health load, every risk phrase/hazard statement for the product is converted to a score ranging from 10 to 100.

5.3.4 Tax revenues

Section 18

The calculation of the tax for each authorised pesticide is published on the DEPA website at [http ...](#)

Should be amended to:

The national regulation describing the pesticide tax and the method of calculating the tax can be found at the website for all national regulations here: [http ...](#)(keep the present link) and the calculated tax for each product can be found in the DEPA website with the pesticide database here: <http://mst.dk/kemi/database-for-bekaempelsesmidler/bmd/>

Section 20

... The current tax brings in more than 750 million DKK...

Should be amended to:

... The current tax was expected to bring in 650 million DKK per year

As part of the policy of the taxation of pesticides, DKK 80 million, equivalent to 10.8 million Euro, is allocated to DEPA to implement the NAP.

Should be amended to:

Initiatives in the NAP are financed by the Danish State. For many years the finance was directly linked to the pesticide tax revenue but is now financed by the general balance. A total of DKK 80 million per year, equivalent to 10.8 million Euro was allocated to DEPA to implement the NAP 2013-2016.

5.3.5 Evaluation of the NAP

Section 22

During the mission, DEPA clarified that the evaluation of the new pesticide tax would not now be carried out until the end of 2017

Should be amended to

During the mission, DEPA clarified that the evaluation of the new pesticide tax will not be carried out until the end of 2017.

... substitution between higher and lower risk pesticides and an ...

Should be amended to:

... substitution of pesticides with higher load to pesticides with lower load and ...

The midterm review, and the annual updates, are available at [http ...](http://mst.dk/kemi/pesticider/sproejtemiddelstrategi-2013-2016/)

Comment: The Danish EPA has made changes to our website, since two authorities have been fused. The link should be amended to the following:

<http://mst.dk/kemi/pesticider/sproejtemiddelstrategi-2013-2016/>

However, this might soon be changed as well, since the new action plan is expected to be published soon.

Section 23

... the period mid-2017 to 2020 ...

Should be amended to:

... the period mid-2017 to 2021 ...

... greater adoption of spray reducing technology under the umbrella of IPM, strengthened controls around water abstraction points, and ...

Should be amended to:

... greater adoption of precision technology as part of IPM implementation, strengthened controls of pesticides retailers, new regulation of areas around water abstraction points, and ...

Section 26

The CAs conduct controls at distributors and farmers, and in the last decade, no cases of the large scale distribution and use of illegal pesticides have been detected. In 2016, at distributor level, the rate of non-compliance was 40%, mainly due to the storage of previously authorised pesticides revoked for more than 18 months. In a broader context, DEPA does not conduct controls on manufacturers based in Denmark, which make pesticides for Denmark, other MSs and third countries, while risk-based controls on imports are planned to commence for 2018 season. DG Health and Food Safety audits have identified the absence of controls on manufacturers and importers as a weakness in the battle against illegal pesticides.

Should be amended to:

The CAs conduct controls at distributors and farmers, and in the last decade, no cases of large scale distribution and use of illegal pesticides have been detected. In 2016, at distributor level, the rate of non-compliance was 40%, mainly due to the storage of previously authorised pesticides revoked for more than 18 months. In a broader context, DEPA have not conducted controls by the Chemical Inspection Service on pesticides at the manufacturer level. The Environmental Service, which also is an inspection service of DEPA conduct control at the manufacturer level each year and the Chemical Inspection Service plan to join the inspection in 2017. Risk-based controls on imports in cooperation with the Customs Authority at the Danish harbours are planned to commence for 2018 season.

Comment: DEPA suggest the last sentence "*DG Health and Food Safety audits have identified the absence of controls on manufacturers and importers as a weakness in the battle against illegal pesticides.*" to be deleted. First of all because there is yearly inspection of such companies as such and also because we do not regard this comment as relevant for a fact finding mission.

5.4 Training and certification of operators

Section 30

The following text should be added after section 30.

From 2016 the certificate for applying pesticides for less than 4 hours/year was changed into a certificate for operators using handheld and backpack sprayers which also takes the form of a 10 hour course but which now includes a test. This kind of certificate allows operators to apply pesticides in unlimited hours/year but only with this specific type of spray equipment.

Section 33

... update knowledge on pesticides, technologies to reduce the impact of pesticides and IPM.

Should be amended to:

... updated knowledge on pesticides, technologies to optimize application and to reduce the drift of pesticides and increase the IPM implementation.

Section 36

The last three lines are related to the Danish EPA and not DAFA. We therefore suggest that the following text is moved to a new section below section 36 and slightly amended and will read:

From 2017, DEPA carries out controls on retailers to check if staff are trained and it is planned to commerce controls to check that professional use of pesticides are only sold to trained professional users holding a certificate from July 2020.

Conclusion

Section 37

Denmark has established a system for the training and certification of operators involved in the distribution and use of pesticides authorised for professional use, in line with EU requirements, with the exception of advisors, in which case, the CA do not require these operators to be trained and certified.

Should be amended to:

Denmark has established a system for the training and certification of operators involved in the distribution and use of pesticides authorised for professional use, in line with EU requirements, with the exception of advisors, in which case, the CA do not require these operators to be trained and certified, since their qualifications are regarded as adequate.

Section 40

The link needs to be amended to the following link:

<http://mst.dk/kemi/pesticider/private-haveejere/>

Section 41

DVFA have promoted the “Food With Less Chemistry” awareness-raising campaign since 2013 through a dedicated homepage and via social media. They explained that this campaign provides accurate and balanced information to inform the general public on sustainable use of pesticides, with specific additional advice for vulnerable groups such as pregnant women and babies/children. The campaign includes information for consumers about the pesticide regulatory system, pesticide use in both organic and conventional farming, pesticide residues in food and tools for the consumer to choose food with as few residues as possible and is available at (LINK) They reported that this social media campaign has around 55 000 followers.

Should be amended to:

DVFA have promoted the “Food With Less Chemistry” awareness-raising campaign since 2013 through a dedicated homepage and via social media. They explained that this campaign provides accurate and balanced information to inform the general public on pesticide residues and other chemicals in food, with specific additional advice for vulnerable groups such as pregnant women and babies/children. The campaign includes information for consumers about pesticide residues in food and tools for the consumer to choose food with as few residues as possible and is available at (LINK). They reported that this social media campaign has around 55 000 followers.

Section 42

...except for RTU formulations.

Should be amended to:

... except for RTU formulations and a few concentrated products.

Section 44

Denmark does not require testing of hand held equipment e.g. knapsack sprayers

...

Should be amended to:

Denmark does not require testing of hand held equipment, knapsack sprayers ...

Section 45

They approve PAE testing operators ...

Should be amended to:

They approve PAE inspection operators...

... between 1000 and 3000 remain to be tested and therefore cannot be used, until tested and certified. Sprayers tested and certified in other MS are mutually recognised in Denmark. From 2017, controls on professional users of pesticides include a check that PAE has been tested as required.

Should be amended to:

... between 1000 and 3000 remain to be approved by inspection and therefore cannot be used, until inspected. Sprayers approved by inspection in other MSs are mutually recognised in Denmark. From 2017, controls on professional users of pesticides include a check that PAE has been approved by inspection as required.

Section 48

Comment:

The recent investigations of the BNBO areas has shown that they are on average 3,2 ha and not as we have stated back in May 2,5 ha. Thereby the total BNBO area is 22.000 ha and not 19.000 ha.

Section 50

...Under this programme, authorised pesticides are applied to six representative test fields in line with normal agricultural practices followed by intensive monitoring to determine if there is evidence of the pesticides, or their metabolites, leaching into groundwater.

Should be amended to:

... Under this programme, authorised pesticides are applied to five representative test fields in line with normal agricultural practices followed by intensive monitoring to determine if there is evidence of the pesticides, or their metabolites, leaching into groundwater. In addition a new field in a possibly vulnerable area has been established. Data from this field will show if there is need for special restrictions in pesticide use in these types of vulnerable areas.

Section 51

... Compliance levels in the past five years have been consistently above 98% for authorised pesticides. Over this period, compliance levels for previously authorised pesticides ranged from 90-93%. The non-compliances relate mainly to metabolites of atrazine and dichlobenil, and findings of these substances are declining. These active substances are no longer approved in the EU, from 2007 and 2011 respectively, and Denmark had restricted their use even prior to the EU-wide restrictions.

Should be amended to:

Compliance levels in the past five years have been consistently above 98% for authorised pesticides included in the programme. Over this period, compliance levels for previously authorised and restricted pesticides ranged from 90-93%. The non-compliances relate mainly to metabolites of atrazine and dichlobenil, and findings of these substances are declining. These active substances are no longer approved in the EU, from 2007 and 2011 respectively, and Denmark had restricted their use long before the EU-wide restrictions.

Section 52

...In all cases of breaches relating to currently authorised pesticides, DEPA conduct an investigation to determine the root cause. DEPA stated that all breaches relate to either pesticides that are no longer authorised in Denmark, or the incorrect use of currently authorised products.

Should be amended to:

..In all cases of breaches relating to currently authorised pesticides, DEPA conduct an assessment and in some significant cases investigation to determine the cause. DEPA stated that all breaches relate to either pesticides that are no longer authorised in Denmark, or point sources and incorrect use of currently authorised products.

Section 54

... National regulation No. 245/2013.

Should be amended to:

... *National regulation No. 1749/2015*

Pesticide use in specific areas

Section 59

...*pesticide us has declined from almost 400 g/ha*

Should be amended to:

...*pesticide use has declined ...*

5.11 IPM

Findings

Section 66

There is no system of monitoring or controls either at individual grower level or at a national level, to determine compliance with the eight principles of IPM as described in Annex III of the SUD.

Comment: We do not agree to this text as described on page 1-2 of this document.

Section 67

All Danish farmers are legally obliged ... to DEPA annually. This data ...

Should be amended to:

All Danish farmers above 10 ha as well as all greenhouse growers are legally obliged ... to DEPA annually. This is required in order to fulfil the requirement in the pesticide statistical regulation (1185/2009/EC). This data ...

Section 69

... *Farmers can use the SEGES pesticide load indicator tool to ...*

Should be amended to:

... *Farmers can use the pesticide load calculating tool to...*

Comment: The reason for this change is that the development of the system has been financed by the Danish EPA and that it a system that calculates the load.

Section 70

... frequently recommends reduced rates of pesticides, where the reduce rate is sufficient to control the pest.

... frequently recommends reduced doses of pesticides compared to the authorised maximum dose, where the reduce dose is sufficient to control the pest.

Section 73

In order to promote ... to farmers. SEGES used this funding to provide intensive tow year ...

Should be amended to:

In order to promote ... to farmers. An open tender was won by SEGES who used this funding to provide intensive two year ...

... *in 2016, SEGES changed their strategy in this area, and ...*

Should be amended to:

... *in 2016, SEGES agreed with the Danish EPA to changes their strategy ...*

Section 75

In a broader context ... pesticide area, funded by pesticide tax revenue, since ...

Should be amended to:

In a broader context ... pesticide area, originally funded by pesticide tax revenue, since ...

Comment: Originally there was a direct link between the tax revenue and the research funding, however, for some years it has been part of the general budget.

Section 79

... and the potential for insecticide resistance ...

Should be amended to:

... and the potential risk for development of insecticide resistance ...

Conclusion

Section 86

... This could indicate that a pesticide tax ...

Should be amended to:

... This could indicate that a differentiated pesticide tax ...

Section 87

DK Comment:

We do not agree on the text in section 87 and would like to refer to our comments at page 1-2 of this document.

5.12 Risk Indicators

Findings

Section 88

The current NAP uses the PLI as the key...

Should be amended to:

In the current NAP the PLI is used as the key ...

Section 91

Progress towards achieving the goals of the NAP, measured using these indicators is included in the annual report on the implementation of the Directive as described in paragraph 22. ...

Should be amended to:

Progress towards achieving the goals of the NAP, measured using these indicators is included in the annual report on the progress and status of initiatives listed in the NAP as described in paragraph 22....

Conclusion

... This single indicator measures trends in the load of the volume of pesticides used.

Should be amended to:

... This single indicator measures trends in the environmental and human health load based on both the amount of pesticides used and the amount sold.

6 Main obstacles and difficulties encountered in SUD implementation

Section 93

Bullet No. 1 reads: There is no system ... as described in paragraph 66.

Comment: We would once again refer to our comments at page 1-2 of this document and mention that we do monitor the development of IPM implementation at national level by following the PLI year by year.

7. Good practices and suggestions for improvement of implementation

Section 94

Bullet No. 3 reads:

The policy to use tax revenue raised from pesticides to fund ...

Should be amended to:

The policy to use tax revenue e.g. raised from pesticides to fund ...

Comments to the Danish version of the report

Sammenfatning

The word "*Benchmarks*"

Should be amended to:

Pejlemærker

And this change should be carried out thorough out the document.

Den nuværende plan blev revideret i 2015

Should be amended to:

Den nuværende handlingsplan blev midtvejs evalueret i 2015.

Forkortelser og definitioner anvendt i denne rapport

DAFA: Landbrugs- og fiskeristyrelsen

The agency has recently got a new name "Landbrugsstyrelsen" and the abbreviation should be amended to:

LBST

And this should be amended throughout the report.

DEPA

Should be amended to:

MST

PLAP, Udvaskningsvurderingsprogram for pesticider

Should be amended to:

VAP, Varslingsystemet for udvaskning af pesticider til grundvand

PLI, Indikator for pesticidbelastning

Should be amended to:

PBI, Pesticidbelastningsindikator

RTU, Formulering klar til brug

Should be amended to:

K-T-B, Formulering der er klar-til-brug

TFI, behandlingsindeks
Should be amended to:
BH, Behandlingshyppighed

And these amendments should be made through out the document.

4.3 Landeprofil og statistik
... *brat stigning* ...
Should be amended to:
... *markant fremgang* ...

5.2 Kompetente myndigheder

Resultater

Section 2
En tværministeriel koordineringsgruppe
Should be amended to:
En tværministeriel styregruppe (twice in the section)

Ni underkoordineringsgrupper
Should be amended to:
Ni faglige styregrupper

Section 4
TFI beregnes på baggrund af det samlede salg af hvert pesticid og den almindelige anbefalede anvendelsesdosis for hvert pesticid.
Should be amended to:
BH beregnes på baggrund af det samlede salg af hvert pesticid og standarddoseringen for hvert pesticid i hver afgrøde.

Section 7
...*rentabel drif.*
Should be amended to:
... *driftsøkonomisk optimal dyrkning.*

Section 9
... *efterlyse en omarbejdning af pesticidafgiften*
Should be amended to:
...*efterlyse en omlægning af pesticidafgiften*

Section 10
I den nuværende nationale handlingsplan blev det ...
Should be amended to:
I den femte og nuværende nationale handlingsplan (2013-2015) blev det ...
(Changes due to needed amendments in the English version)

Section 12
Det er værd at bemærke, at TFI for 2012 og 2013 afspejlede nogle landbrugeres forventede adfærd med at oplagre pesticider før indførelsen af den nye afgift.

Should be amended to:

Det er værd at bemærke at BH (som er beregnet på salgsdata) for 2012 og 2013 afspejlede en forventet hamstring af pesticider før indførelsen af den nye afgift.
(due to changes in the English version)

Section 15

...skifte fra højrisikopesticider til mindre risikofyldte pesticider

Should be amended to:

...skifte fra pesticider med høj belastning til pesticider med lavere belastning.

Section 18

"grundafgift"

Should be amended to:

"basisafgift"

Tabel 2

Andel af alle godkendte produkter ...

Should be amended to:

Den procentvise andel af alle produkter ...

Section 22

Sprøjtningforsøg

Should be amended to:

Syn af sprøjter

... virkningerne af at udskifte højrisikopesticider med lavrisikopesticider samt en vurdering af, ...

Should be amended to:

... virkningerne af at substituere pesticider med høj belastning til pesticider med lav belastning samt en vurdering af ...

Section 23

... herunder resistens styring og mere udbredt indførelse af teknologi til reduktion af sprøjtning under paraplyen for integreret bekæmpelse af skadegørere.

Should be amended to:

... herunder handlingsplan mod pesticidresistens og en mere udbredt anvendelse af præcisionssprøjtning som et led i implementeringen af IPM.

Section 30

... yderligere uddannelse af syv timers varighed ...

Should be amended to:

... yderligere uddannelse (opdateringskurser) af syv timers varighed.

Section 35

... fra større avlere og leverandører og med støtte fra ..

Should be amended to:

... fra større bedrifter og maskinstationer og med støtte fra ...

Section 43

Nationale forgiftningscentre under ...

Should be amended to:

Gifotlinjen under ...

Som led i sit generelle program for finansiering af forskning i pesticider har Miljøstyrelsen ...

Should be amended to:

Som led i sit generelle bekæmpelsesmiddelforskningsprogram har Miljøstyrelsen ...

Section 44

Danmark har indført et system med afprøvning og tildeling af certifikater for pesticidudbringningsudstyr i overensstemmelse med EU-kravene. Afprøvning og certificering af pesticidudbringningsudstyr var ikke obligatorisk i Danmark før direktivet. Nu kræver Danmark, at alle bomsprøjter (herunder sprøjter < 3 m), frugtsprøjter og sprøjetog bliver afprøvet og certificeret i henhold til tidsplaner, der er oprettet i medfør af direktiv 2009/128/EF. Danmark kræver ikke afprøvning af håndholdt udstyr, f.eks. rygsprøjter, granulatudbringningsudstyr eller frøbehandlingsudstyr, og der er ingen planer om at udvide krav om afprøvning til disse udstyrskategorier. Miljøstyrelsen er overbevist om, at sikker anvendelse af pesticider i dette udstyr er dækket i de obligatoriske uddannelser af operatører.

Should be amended to:

Danmark har indført et system med afprøvning og tildeling af synsrapporter for pesticidudbringningsudstyr i overensstemmelse med EU-kravene. Afprøvning og syn af pesticidudbringningsudstyr var ikke obligatorisk i Danmark før direktivet. Nu kræver Danmark, at alle bomsprøjter (herunder sprøjter < 3 m), tågesprøjter og sprøjetog bliver afprøvet og synet i henhold til tidsplaner, der er oprettet i medfør af direktiv 2009/128/EF. Danmark kræver ikke afprøvning af håndholdt sprøjter, rygsprøjter, granulatspredere eller bejdseudstyr, og der er ingen planer om at udvide krav om syn til disse kategorier af udstyr. Miljøstyrelsen er overbevist om, at sikker anvendelse af pesticider med dette udstyr er dækket i de obligatoriske uddannelser af sprøjteførere.

Section 45.

Miljøstyrelsen er den kompetente myndighed for afprøvning og udstedelse af certifikater for pesticidudbringningsudstyr, som efter en inspektion vurderes at overholde lovgivningen. Miljøstyrelsen godkender operatører til afprøvning af pesticidudbringningsudstyr, har oprettet en centraliseret database til registrering af resultaterne af inspektioner af pesticidudbringningsudstyr og har hyret et eksternt firma til at overvåge disse operationer. Miljøstyrelsen fremhævede, at denne database giver den en betydelig mængde data om pesticidudbringningsudstyrets profil i landet, såsom tankstørrelse, bombredde og de mest almindelige mangler, der registreres underafprøvning. Miljøstyrelsen informerede deltagerne om, at alle afprøvnings sker i overensstemmelse med kravene i direktivets bilag II og den relevante EN-standard, hvor det er relevant.

Der er ca. 100 inspektionsfirmaer og 200 uddannede inspektører. I øjeblikket er næsten 10 000 stykker udstyr blevet afprøvet, og Miljøstyrelsen vurderer, at mellem 1 000 og 3 000 mangler at blive afprøvet og derfor ikke kan anvendes, før de er afprøvet og certificeret. Sprøjter, der er afprøvet og certificeret i andre medlemsstater, anerkendes gensidigt i Danmark. Fra 2017 omfatter kontroller af professionelle brugere af pesticider en kontrol af, om pesticidudbringningsudstyret er blevet afprøvet i henhold tilkravene.

Should be amended to:

Miljøstyrelsen er den kompetente myndighed for syn og udstedelse af synsrapporter for pesticidudbringningsudstyr, som efter en syn vurderes at overholde lovgivningen. Miljøstyrelsen godkender synsvirksomheder til afprøvning af pesticidudbringningsudstyr, har oprettet en centraliseret database til registrering af resultaterne af syn af pesticidudbringningsudstyr og har hyret et eksternt firma til at føre tilsyn med synsvirksomhederne. Miljøstyrelsen fremhævede, at denne database giver den en betydelig mængde data om pesticidudbringningsudstyrets profil i landet, såsom tankstørrelse, bombredde og de mest almindelige mangler, der registreres i forbindelse med synet. Miljøstyrelsen informerede deltagerne fra Kommissionen om, at alle afprøvninger sker i overensstemmelse med kravene i direktivets bilag II og den relevante EN-standard, hvor det er relevant. Der er ca. 100 inspektionsfirmaer og 200 uddannede inspektører. I øjeblikket er næsten 10 000 sprøjter blevet synet, og Miljøstyrelsen vurderer, at mellem 1 000 og 3 000 mangler at blive synet og derfor ikke kan anvendes, før de er testet og synet. Sprøjter, der er testet og synet i andre medlemsstater, anerkendes i Danmark. Fra 2017 omfatter kontroller af professionelle brugere af pesticider en kontrol af, om pesticidudbringningsudstyret er blevet synet i henhold til kravene.

Section 47

Resten af befolkningen, hovedsagelig i fjerntliggende egne, får deres vandforsyning fra omkring 40.000 private boringer

Should be amended to:

Resten af befolkningen, hovedsagelig i landdistrikterne, får deres drikkevand fra omkring 40.000 private boringer.

Section 48

... ved hjælp af data fra kortlægningsprojektet af grundvand definere ...

Should be amended to:

... ved hjælp af data fra grundvandskortlægningen definere ...

Section 50

... at pesticiderne eller deres næringsstoffer ...

Should be amended to:

... at pesticiderne eller deres nedbrydningsprodukter ...

Section 54

Den nationale handlingsplan fastlægger to referenceværdier på dette område.

Should be amended to:

Den nationale handlingsplan indeholder to pejlemærker på dette område.

Section 55

... pesticider på offentlige områder under deres kontrol.

Should be amended to:

... pesticider på offentlige arealer.

Section 59

... om at nedbringe anvendelsen har investeret ca. ...

Should be amended to:

... om at nedbringe pesticidanvendelsen har investeret ca...

Section 66

Miljøstyrelsen mener, at referenceværdien i den nationale ...

Should be amended to:

Miljøstyrelsen mener, at pejlemærket i den nationale ...

Section 67

... til årligt at indsende deres fortegnelse over anvendelse af pesticider i ...

Should be amended to:

... til årligt at indsende deres sprøjtejournal data i et fastlagt ...

Section 68

Ca. 450 medarbejdere beskæftiger sig med produktion af afgrøder, ...

Should be amended to:

Ca. 450 medarbejdere beskæftiger sig med planteproduktion, ...

Section 69

... formål udarbejdet en række støttesystemer til integreret bekæmpelse af skadegørere og beslutningstagning for rådgivere og avlere.

Should be amended to:

... formål udarbejdet en række beslutningsstøttesystemer til integreret bekæmpelse af skadegørere for rådgivere og avlere.

Avlere kan benytte SEGES's indikatorværktøj for pesticidbelastning til beregning af ...

Should be amended to:

Avlere kan benytte et it-system kaldet pesticidbelastningsberegneren til beregning af ...

... for at vælge mere modstandsdygtige varianter.

Should be amended to:

... for at vælge mere resistente sorter.

Section 72

Afgrødespecifikke retningslinjer

Should be amended to:

Afgrødespecifikke dyrkningsvejledninger ...

(should be amended three times in this section)

Section 73

... om fremtidige tilgange hertil, et partnerskab, der skal fremme præcisionsteknologi i anvendelsen af pesticider og styring af modstandsdygtighed.

Should be amended to:

... om fremtidige IPM tiltag, et partnerskab, der skal fremme præcisionsteknologi i anvendelsen af pesticider og handlingsplan mod pesticidresistens.

Section 74

... demonstrationsbedrifter (fem med agerjord, et gartneri ...

Should be amended to:

... demonstrationsbedrifter (fem landbrugsbedrifter, et gartneri ...

Section 75

Miljøstyrelsen har siden starten af 1990'erne mere overordnet haft en flerårig forskningsstrategi om pesticider generelt. Den er finansieret af overskuddet fra pesticidafgiften.

Should be amended to:

Miljøstyrelsen har siden starten af 1990'erne haft en flerårig forskningsstrategi om pesticider. Den var oprindeligt finansieret af midler fra pesticidafgiftsprovenu.

Section 76

For det første modtager økologiske landbrugere ekstra områdbestemte betalinger i forhold til deres konventionelle kolleger. For det andet tilbydes der finansiering som tilskud til kapitalinvesteringer.

Should be amended to:

For det første modtager økologiske landbrugere et øget arealtilskud i forhold til deres konventionelle kolleger. For det andet tilbydes der generelt til landbrugere en tilskudsordning til miljøteknologiinvesteringer.

Section 77

Danmark har et relativt stort udvalg af ikkekemiske pesticider ...

Should be amended to:

Danmark har et relativt stort udvalg af ikke-kemiske pesticider ...

Section 78

Rækken af kemiske ...

Should be amended to:

Omfanget af kemiske ...

De parter, som deltagerne mødte, udtalte ...

Should be amended to:

De parter, som Kommissionen mødte, udtalte ...

Section 80

... fremfor at have bedre rotation med flere forårsafgrøder, hvilket vil gøre biologisk bekæmpelse nemmere.

Should be amended to:

... fremfor at have et bedre sædskifte med flere vårafgrøder, hvilket vil fremme muligheden for brug af kulturtekniske foranstaltninger.

"Rotation" should be amended to "sædskifte" later in this section.

Section 86

The word "afgrødebeskyttelse" should be amended to "plantebeskyttelse"

Section 88

"meget problematiske stoffer" Should be amended to "særligt problematiske stoffer".

Section 89

"Referenceværdier" should be amended to "pejlemærker"

"Disse indikatorer er:" should be amended to "Disse pejlemærker relaterer sig til:"

The first bullets should be amended to the following:

Fund af godkendte pesticider i grundvandet

Section 94

Anvendelsen af teknologi til nøjagtig anvendelse af pesticider i forbindelse med jernbaner...

Should be amended to:

Anvendelsen af teknologi til præcisionssprøjtning på jernbaner ...

8. Samlet konklusion

In second paragraph:

... inspektion af sprøjteudstyr

Should be amended to:

... syn af sprøjteudstyr

We hope the Commission will take the above mentioned comments into consideration before finalising the report.

Best regards,

Mette Hyldebrandt-Larsen