

# **Public feedback received on SUD evaluation roadmap/inception impact assessment**

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# SUD Revision: overall timeline

**MAY 2020**

**2nd QUARTER 2021**

**4th QUARTER 2021**

**1st QUARTER 2022**



Launched Public feedback exercise on Evaluation of SUD Roadmap and Inception Impact Assessment (closed Aug 7 2020)



Commission concludes the evaluation



Commission concludes the impact assessment



Commission adopts new legislative proposal



# Initial Public Feedback



- Combined evaluation roadmap and inception impact assessment for planned SUD revision
- Published 29 May, was open for public feedback until 7 August
- Via Better Regulation portal website, 360 comments received, viewable at: <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12413-Sustainable-use-of-pesticides-revision-of-the-EU-rules>
- Feedback will be taken into account by the Commission throughout the procedure and also in the supporting external study



# Feedback from these countries

## Identified country of origin of individual feedback comments:

France 118	Lithuania 6	Ireland 1
Austria 42	Croatia 2	Portugal 1
Italy 38	Latvia 2	Romania 1
Belgium 37	Poland 2	Slovakia 1
Greece 31	Sweden 2	<b>Non-EU countries</b>
Germany 25	Cyprus 1	Canada 2
Spain 22	Denmark 1	Ecuador 1
The Netherlands 12	Finland 1	Switzerland 1
Czech Republic 8	Hungary 1	UK 1



# From these stakeholders

User type/self-identification:	
EU citizen 208	Environmental organisation 5
Business association 62	Consumer organisation 2
Non-governmental organisation 33	Public authority 2
Company business organisation 24	Trade union 2
Other 17	



# On these topics

## Examples of topics raised:

Impact assessment	Distortion of the Single Market
Use of new technologies	Climate Change
Risks to health and environment	Pesticide application equipment
Use of pesticides	Integrated pest management (IPM)
Organic production	Water protection and buffer zones
EU rules and international trade	Communication and information
Issues with specific pesticides	SUD implementation



# Overall

Wide range of comments

Many diverging views

Some examples of areas which were the focus of many comments include: organic production, new technologies and innovation, perceived safety or risks of using pesticides, production standards of 3rd country imports

This is just the 1st step in much larger consultation process



# Organic production

*+ all production should be organic and VAT on organic products should be reduced.*

*- organic production is unjustifiably glorified and would increase greenhouse gas emissions.*





# Use of new technologies

*+ new technologies, novel breeding/genomic techniques, GMOs, digitalisation, precision farming, robotics ..need to be promoted.*

*- more precise pesticide technology is not the answer to reducing associated risks.*



# Use of pesticides

*+ pesticides are essential for food yields and quality.*

*- all pesticides should be phased out and banned.*



# 3rd country imports

The only issue where there was a **unanimous** consensus.

*numerous citizens and NGOs emphasised that stricter EU rules are needed. Industry and business organisations stated that EU farmers already face unfair competition from third countries using pesticides not authorised in the EU.*



# Opportunities for further discussion



- Both the external study contractor and the Commission will organise further stakeholder consultation events
- An online public consultation/Have Your Say event launched
- A dedicated one-off Better Training for Safer Food event with Member State competent authorities already took place 17-19 Nov.
- Commission will keep stakeholders informed and updated of ongoing developments, via SUD WG, PAFF Standing Committee, Commission's SUD webportal website, Advisory Group on the Food Chain and Animal and Plant Health etc.



THANK YOU

