



SUD policy options planned to be subject to impact assessment

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Important to note !

- There are alternative policy options to be assessed in the impact assessment (baseline scenario, least, moderately and most ambitious options)
- The assessment of impacts of these policy options will inform the policy decision to be taken by the Commission at a later stage
- Some policy options are linked to ambitions or commitments of other EU policies e.g. Common Agricultural Policy (CAP), Biodiversity Strategy for 2030
- In parallel the Commission will also assess the impacts of some potential legislative simplifications to reduce administrative burden or costs

Impacts of achieving two Farm to Fork Strategy pesticide use and risk reduction targets (links with organic farming target also)

Baseline scenario: these remain as aspirational targets as already communicated in Farm to Fork and Biodiversity Strategies



Moderately ambitious option: binding targets to be achieved at EU level



Most ambitious option: binding targets to be achieved at EU and MS levels

- Consider differing national situations and starting-points of MS
- Concept of burden-sharing
- (Consequences or future Commission actions if the targets not met)

Need to consider in the impact assessment potential costs and benefits of reducing pesticide use and risk

- Costs/savings/benefits to pesticide users
- Costs/savings/benefits to wider society and environment
- Other impact assessment studies are also under way concerning these targets, for example by university groups and perhaps by other stakeholders and Member State authorities
- Stakeholders are welcome to share such data or study results with the Commission or external study contractor

Integrated Pest Management (IPM)

- Least ambitious options: more detailed training for advisors on IPM, adapt current IPM principles to potential of new technologies and precision farming
- Moderately ambitious option: specific record-keeping by professional pesticide users as a tool to monitor and enforce IPM implementation
- Most ambitious option: use mandatory crop-specific standards as a basis for future controls and enforcement (link with possible incentives under future CAP)

Pesticide application equipment (PAE)

- Least ambitious option: Commission support for further development and application of harmonised PAE testing standards
- Moderately ambitious option: require new PAE to be tested before being put into use to avoid the risk that potential defects could go undetected until first tested years later
- Most ambitious option: all of the above plus include PAE in scope of Official Controls Regulation (EU) 2017/625 (MS and stakeholders previously objected to this, assess whether the situation has changed)

National Action Plans (NAPs)

- Least ambitious option: Commission develops further guidance and templates to try to make these more effective and useful
- Link to reporting annual MS progress towards achieving the Farm to Fork Strategy targets

Alternatively potential deletion of requirement for NAPs to reduce administrative burden on MS, to be replaced by these annual Farm to Fork target progress updates and links to CAP National Strategic Plans

Training and advisory systems

- Require training for those using and applying plant protection products (PPPs) instead of those purchasing PPPs
- Require mutual recognition of training certificates from different MS
- Require that advisory services be independent from an economic interest in selling PPPs or PAE

Aerial spraying, drones

- Least ambitious option: amend definition of aerial spraying to confirm (again) that aerial spraying can be via any airborne device including drones, not just planes and helicopters
- Moderately ambitious option: within certain parameters, to be defined in a future legislative Annex, no derogation would be required for aerial spraying by drones if demonstrated to reduce overall use and risk
- Most ambitious option: allow spraying (including aerial spraying) without prohibition and without derogation if the spraying instrument is for example less than 2 metres from the crop being sprayed, other parameters concerning use and risk would need to be studied and established

Health and environmental monitoring, data, indicators

- Collect more data on use of PPPs, acute and chronic poisoning incidents and health and environmental monitoring as a basis for development of possible future additional risk indicators

Restriction on PPP sales

- Only professional users allowed to purchase more hazardous PPPs as defined in footnote 13 to Farm to Fork Strategy: PPPs containing active substances that meet the cut-off criteria as set out in points 3.6.2. to 3.6.5 and 3.8.2 of Annex II to Regulation (EC) No 1107/2009 or are identified as candidates for substitution in accordance with the criteria in point 4 of that Annex
- Require a prescription to purchase/use more hazardous PPPs

Restrictions on PPP use

- Moderately ambitious option: prohibit use of the more hazardous pesticides (as defined in footnote 13 of Farm to Fork Strategy) in sensitive areas such as urban green areas
- Most ambitious option: prohibit the use of ALL chemical pesticides in sensitive areas such as urban green areas
 - This is an ambition of EU Biodiversity Strategy for 2030: “No chemical pesticides are used in sensitive areas such as EU urban green areas”

Thank you



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