



Council of the European Union
General Secretariat

Brussels, 09 October 2020

WK 8636/2020 ADD 6

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WORKING PAPER

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CONTRIBUTION

From:	General Secretariat of the Council
To:	Working Party on Agricultural Questions (Pesticides/Plant Protection Products)
N° prev. doc.:	ST 8238/20 + ADD 1
Subject:	Council Conclusions on the REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL On the experience gained by Member States on the implementation of national targets established in their National Action Plans and on progress in the implementation of Directive 2009/128/EC on the sustainable use of pesticides - Examination on the draft Council Conclusions - LT comments

Delegations will find attached LT comments on the subject above.

LT comments

State Plant Service under ministry of Agriculture provide comments to the Council Conclusions on the report from the Commission to the European Parliament and the Council on the experience gained by Member States on the implementation for national target established in their national action plan and on progress in the implementation of directive 2009/128/EC on the sustainable use of pesticide.

Regarding to the 50% reduction in PPP consumption until 2030:

- As each Member State currently use individual amounts of PPPs for different plants (crops), and we do not consider it appropriate to apply the same requirement to all MS by 2030 to reduce the amount of PPP used by 50%. Therefore, we propose to perform real analyzes for each country individually and estimate the amount of PPP by each Member State separately according to the crops grown in it, and only then to decide on a country-by-country basis according to the degree of risk of PPP and if needed reduction of PPP use amounts individually.

Regarding the trainings organized by BTSF:

- Better Training for Safer Food is useful tool, but it is more an information-sharing format, so we suggest that this trainings should focus more on developing solutions to specific problems that can be put into practice in the Member States, e.g. on the specification of IPM principles at the level of realistically verifiable requirements. We mean that the lecturer (s) should provide more specific advice, possible solutions / scenarios, and not just share experiences on how each party understands and strives to implement certain requirements.
