

Dear [REDACTED], dear [REDACTED],

In reply to your request for reply to the document with possible future SUD policy options, hereby we inform you about some preliminary thoughts on possible developments in the sustainable use of pesticides, based on experiences and personal views of colleagues of the Ministry of Agriculture, Nature and Food Quality and the Netherlands Food and Consumer Product Safety Authority (NVWA, responsible for plant protection advices and enforcement).

As stated before, we believe it is premature to come with a formal position on possible policy options for the SUD as the review of the directive is still ongoing. However, we welcome a discussion to improve the sustainable use of pesticides and are willing to contribute to it. In September 2020 the Dutch government, together with a number of stakeholders, agreed on an Implementation programme to work towards a transition to resilient plant and cultivation systems, a better connection between agriculture and nature and to negligible emission of PPP's to the environment. But that does not mean that there is a need for more stringent EU harmonized regulations. For most of the points mentioned in the Commissions document with possible SUD policy options, we believe that the current SUD provides sufficient tools for the sustainable use of pesticides.

Furthermore, we would like to draw your attention to the following. The directive deals with the sustainable use of pesticides; reducing the use and risks of chemical PPPs (e.g. by reducing dependency and careful use). However, this reduction will only become successful if more attention is paid to effective, viable and affordable low risk and non-chemical IPM alternatives. The control of pests and diseases remains necessary for a cost-effective quantitative and qualitative yield. It would be good if the directive paid more attention to these alternatives, thus more balanced between regulations on limiting the use and risks of PPPs and, on the other hand, encouraging non-chemical alternatives. For instance, not only ask for targets for reducing use and risks of PPP's but also targets to increase the use and availability of non-chemical measures or other means to stimulate IPM.

However, regarding your discussion paper, we would like to comment on the issues (1) IPM, (5) Coloured coded labelling of PPP's, (9) prescription systems for some PPP's, (13) (legally binding) targets to reduce use and risks and (15) Harmonised risk indicators

(1) IPM. Given the diversity of plant health problems and the different (climatic, geomorphological and socio-economic) conditions in which crops are grown, within a EU Member state country and certainly within the EU as a whole, we are in general cautious about changes to the current legal provisions for the principles of IPM. However, we recognize that changes could contribute to a more harmonized implementation of IPM. Specifically we think that improvements may be conceivable in (harmonised) regulations for IPM record keeping, especially when it comes to monitoring pests and diseases (2nd IPM principle) and evaluating the effectiveness of measures (8th IPM principle). These two aspects are more generic in nature and are relevant in all circumstances. And in our opinion essential for the awareness or deployment of plant protection measures (ppp's or non-chemical) and the effectiveness of PPPs and alternatives. It provides the basis for benchmarking between growers with more or less similar cultivation practices. But also a generic tool for monitoring if and to what extent IPM is implemented.

(5) Colour coded labelling of PPPs

Initiatives that contribute to raising awareness of the risks that may come with PPPs are worth investigating. This includes not only colour coding, as proposed here, but possibly also forms of digitisation of information about the correct and careful application of PPPs. At present, the emphasis is only on the printed label of the PPP. Digital usage regulations and other means of communication will increase the possibilities to inform growers about risks and careful use.

(9) Prescription system for some PPP's

In the Netherlands we are exploring the possibilities for prescription systems for PPPs, but it is important to mention that this is done in the context of the authorisation of PPPs, i.e. in the context of Regulation 1107/2009. For example, for emergency notifications.

(13) (Legally binding) targets to reduce use and risks

Targets to reduce use and risks are already getting attention in the SUD, as part of the NAP. The new element of (13) concerns 'legally binding'. For this element, we would like to refer to the Council conclusions drawn up in response to the F2F strategy. A thorough impact assessment of costs and benefits related to a reduced use of PPP's should first be carried out for such targets.

(14) Harmonised risk indicator

Further development of HRIs is desirable because the current HRIs are not based on objective risks. The SUD is now focusing on HRIs at national and EU level. In our view, it would be good if the EU and/or Member States also developed HRIs that are applicable at farm level, possibly as a benchmark tool for growers. So that growers can use it in their choice for the measures to be used. In the Netherlands, research is currently being carried out whether a previously developed environmental indicator for chemical PPP's on farm level can be developed into an environmental impact indicator for all kinds of measures (chemical and non-chemical) .