

Implementing good practice within the Sustainable Use Directive for Plant Protection Products: the farmer's perspective



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◇ Introduction

The Directive on the sustainable use of plant protection products (PPPs) (Dir. 2009/128), adopted on 21st October 2009, aims to reduce the risk of PPPs to human health and the environment, whilst also seeking to streamline proper use in the field.

In order to achieve these objectives, all MSs must set up national action plans by 14th December 2012 in which they set 'quantitative objectives, targets, measures, timetables and indicators to reduce risks and impacts of pesticide use on human health and the environment and to encourage the development and introduction of integrated pest management and of alternative approaches or techniques in order to reduce dependency on the use of pesticides by when and how they intend to achieve them' (Dir 2009/128/EC).

Although the drafts, or even finalised versions, of some Member States' national action plans are already available, others have only just started discussions or will soon be starting them.

Copa-Cogeca would like to highlight the fact that in most Member States, measures are already in place to reduce the risks and impacts associated with the use of PPPs. This needs to be acknowledged as discussions continue at national level regarding the development of national action plans.

Through this document, Copa-Cogeca would like to present some examples of best practice and sound principles for the sustainable use of PPPs which are already carried out in several MSs. Particular attention has been given to:

1. Training and certification of users
2. Systematic data collection on the use of PPPs
3. Information and awareness raising
4. Technical checks of spraying equipment
5. Aerial spraying
6. Specific measures to protect the aquatic environment and drinking water
7. Reduced or PPP-free zones
8. Handling and storage of PPPs
9. Common framework for integrated pest management (IPM)
10. Quantitative use reduction

◇ General comments on national action plans

Agriculture and plant protection products are going through a period of thorough readjustment following the adoption of the plant protection package. A significant number of active substances (ASs) had to be phased out of the market as they did not comply with the new legislative requirements¹. At the same time, changes to the EU MRL (maximum residue level) system have accelerated the decline in the number of AS authorisations for the agricultural sector as a whole.

Gap analyses conducted in several Member States have already highlighted that crop protection in some agricultural sectors is very much under threat. In view of these constraints, the implementation of national action plans must not further exacerbate the existing vulnerability of many crops or jeopardise the sustainability and multi-functionality of European agriculture. On the contrary, they should ensure that while reducing the risk posed by PPPs to human health and the environment, a wide range of instruments is also offered to meet consumers' expectations without compromising the EU's level playing field.

It is evident that novel strategies (i.e. those not already adopted) to allow growers to produce using alternative pest and disease strategies will not be immediately available and considerable investment will be required to achieve progress across the various agricultural sectors.

Within the EU, the specific nature of the farming sector and its infrastructure vary widely between Member States and the proposed measures will need to take this into account. European standards must be met by all Member States. European derogations should only cover specific areas and must be financially compensated. Copa-Cogeca is of the opinion that national authorities are best placed to identify the appropriate measures to be taken and adapted to national, regional or local situations, provided that these are developed in an accurate manner without endangering the EU's level playing field. Therefore, Copa-Cogeca requests that the European Commission carefully monitors the implementation of the national action plans, ensuring that distortion of competition between Member States is avoided and that all operators in the European Union, including consumers, are provided with clear benchmarks.

National action plans should only focus on risk reduction and not on volume reduction, as this would be incompatible with the continuously declining number of PPPs available on the market and would consequently lead to the development of a resistance to certain active substances by harmful organisms.

Consultation and sharing of information and expertise with

(1) From over 1000 active substances available in 1991, there are now only around 250 active substances authorised on the market.

relevant representatives from industry, distributors and users is of central importance. In particular, the development of national action plans has to be done with the involvement of all stakeholders.

Access to specific knowledge on application needs and spraying schemes and to a broad diversity of control mechanisms (including chemical, non-chemical and cultural methods used routinely in IPM/ICM² programmes), to encourage farmers and growers to 'ring the changes' by using a combination of protectant and systemic eradicator products from different modes of action group, forms the backbone of any resistance management strategy. This concept is of fundamental importance and plays a key role in the goal of sustainable agricultural production.

It is important to raise the profile of environmental issues during the decision-making process prior to crop protection application. Greater attention must be paid to effective training especially in improving environmental awareness and the potential impact of PPPs in the wider environment. Knowledge of the individual products and their environmental performance relative to each other would help to enable farmers to make informed choices. This must be the starting point for any concerted action to reduce environmental pollution.

More attention should be paid to the provision of training and information for farmers, technicians and agricultural advisors. Proper knowledge of the products themselves and their appropriate application is the starting point for any concerted action aimed at reducing health and pollution risks. In the various national action plans, the need for more intensive farm advice should be recognised, with particular emphasis on the importance of advice on plant protection. In addition to this, further efforts are needed to improve the transfer of scientific knowledge, taking into account new approaches such as the development of bio-pesticides or biological pest control through appropriate advisory measures or through support for voluntary additional training. The development of cost-effective low-risk plant protection schemes is of the utmost importance.

Farmers, growers and/or their advisors rarely make the decision to use a crop protection product without first weighing up the various options available. However, as economic margins for crop production continue to be squeezed this will highlight the apparent conflict between the aims of the thematic strategy and the growers' priority to remain competitive. In addition to this, as long as imports from third countries do not meet EU environmental, plant protection and consumer protection standards, this will further reduce the competitiveness of EU farmers.

(2) Integrated Crop Management

◇ Specific comments on examples of good practice

Training and certification of users



Directive 2009/128/EC (art.5)

Member States shall ensure that all professional users, distributors and advisors have access to appropriate training by bodies designated by the competent authorities. This shall consist of both initial and additional training to acquire and update knowledge as appropriate.

• Copa-Cogeca position

Basic training and continued information is crucial for everyone applying PPPs, including farmers. Basic training has to be accessible to all professional users. Several farmers' unions and cooperatives are already involved in such programmes and in some Member States there is already a legislative framework in place. Furthermore, training should be mandatory for advisors, distributors and local authorities. When certifying users, practical experience, regional variations and differing farm sizes need to be taken into account. Copa-Cogeca is in favour of a device that certifies the skills of users whether they are acquired through appropriate training or verified by a test. Financial instruments are crucial for achieving the prerequisite for good agricultural practice.

• Examples of good practice:

Hungary – Training and certification are in place. The certificate issued by the Central Agricultural Office permits professional users to sell, purchase and use PPPs. Different levels of training give farmers the opportunity to use any kind of Plant Protection Product, or only those belonging to certain categories (e.g. category II and III). A training programme needs to be attended on a regular basis in order to keep the certificate.

Germany - A system of proficiency certification has been in place for some time. Proof of necessary technical skills and understanding is regulated through 'proficiency in matters of plant protection'. A special legal directive sets the rules for achieving the proficiency certification for users and distributors separately. This ensures that all professional users and handlers of plant protection products are fully competent.

Latvia - Only persons who have received a certificate attesting the acquisition of basic knowledge about plant protection can use PPPs classified as class one or two. In addition to this, there is always a certified employee at points of sale to provide sound advice to buyers on the proper use of PPPs.

Portugal - Training sessions are required for all professional users and handlers of plant protection products. Moreover, practical training and workshops are also provided for trainers of professional users in order to harmonise and improve the training process at national level.

Systematic data collection on use of PPPs



Directive 2009/128/EC (art. 6)

Mandatory collection of data on sales, distribution and use (participation to be defined) and creation of a Member State quality control procedure is recommended.

• Copa-Cogeca position

The administrative burden for farmers needs to be reduced to a minimum. Record keeping can be an important management tool. Knowledge of what, where, when and how much PPP has been applied to a field or crop can help to develop suitable plant protection strategies at farm level. Special consideration should be given to existing data/information collection systems and requirements, e.g. in the [food hygiene](#)³ requirements, in order to avoid duplicate work being carried out.

(3) Regulation 852/2004 of 29 April 2004 (OJ 226/3 of 25th June 2004) – in particular Annex I Part A § 9

For Copa-Cogeca, record keeping of PPP use at farm level must be kept to a minimum (e.g. need to specify which PPPs are used, when, where and how much). Existing certification schemes should be considered as well as insurance companies' requirements. National data collection must correspond with standard recordkeeping on farms and should certainly not require information from more than 3 years ago.

- **Examples of good practice:**

Austria - A data collection system is in place as part of an integrated production system within the Austrian environmental programme. The amount of funding used for this project is repaid through rural development programmes.

France - Since 2008, distributors have kept records of sales, which are the basis for calculating the NODU (Nombre de Doses Unitaires spécifiques à la substance active); an indicator used for plant protection products for all crops which is calculated on an annual basis. Within the ECOPHYTO plan, registration of plant treatment is mandatory at farm level as part of the regional and national data collection system.

Italy - A data collection system has been in place for many years. In the future, it will also include data on the status and outcome of pest monitoring. Thereby ensuring a good flow of information and optimising the use and efficiency of plant protection products at farm level.

Latvia – In addition to recordkeeping by certified holders of PPPs, professional users also have to register data on the PPPs they acquire, the plants they treat, the area treated, the date of treatment and the name and dosage of the PPP used.

Portugal - Pesticide distributors maintain registers on PPPs, specifying the name of the buyer, the commercial name of the PPP, the quantity sold and the date on which it was sold. Farmers record data for the PPPs applied (the type of PPP used as well as where, when and how much).



Information and awareness-raising



Directive 2009/128/EC (art. 7)

Member States shall take measures to inform the general public and to promote and facilitate information and awareness-raising programmes and the availability of accurate and balanced information relating to PPPs for the general public, in particular regarding the risks and the potential acute and chronic effects for human health, non-target organisms and the environment arising from their use and the use of non-chemical alternatives.

- **Copa-Cogeca position**

Information given to the general public should be objective, balanced and science-based. It should not only cover environmental and health aspects relating to the use of plant protection products, but should also include messages explaining why they are used and what their benefits are.

- **Examples of good practice:**

Austria – The Chambers of Agriculture regularly inform the general public and farmers about the responsible use of PPPs and their effects by publishing press releases and through their relevant websites.

France - The “Ecophyto 2018 project” aims to provide the general public with information. Each year, indicators on the use of PPPs are published and publicly discussed.

Hungary – Every year, the Central Agricultural Office publishes a PPP catalogue containing all certified PPPs, their main characteristics, safety instructions, applications, etc. Several different sources of information are available: the official “green book” and “white book”, articles in agricultural magazines, relevant websites and the advisory services of the Hungarian Chamber of Agriculture or the Hungarian Chamber of Plant Protection Engineers and Plant Doctors.

UK - As part of the Voluntary Initiative Programme, environmental information sheets have been produced for the majority of PPPs on the market in the UK.

Technical check of spraying equipment



Directive 2009/128/EC (art.8)

Member States shall ensure that pesticide application equipment in professional use shall be subject to inspections at regular intervals. The interval between inspections shall not exceed five years until 2020 and shall not exceed three years thereafter.

- **Copa-Cogeca position**

It is essential that equipment used for spraying agrochemicals is inspected on a regular basis, whether by the farmer themselves (or their staff) or at a special station.

The development, implementation and timescale for low-cost testing schemes need to be discussed and agreed upon with the stakeholders involved at national level. Putting new application equipment and technology into practice for reducing spray drift and PPP use should be given particular support.

- **Examples of good practice:**

Austria - Technical checks of spraying equipment take place at regular intervals as part of ad-hoc workshops. Financial contributions are made within the rural development programmes.

Belgium - Legal requirements are already in place for the mandatory inspection of spraying equipment by an official body and handling and storage of PPPs, including the need for a warning sticker on the entrance of storage rooms.

France – Since 2009, a technical inspection by an officially approved institution is periodically required. Anti-drift material and equipment for wastewater treatment are also controlled by the competent authorities.

Germany - Mandatory inspections take place periodically within a network of test centres. There are several examples of efficient use of PPPs through directed nozzles, controlled sensors and assay techniques. Directed nozzles enable the percentage of drift to be reduced and avoid reaching fishing areas and non-targeted areas.

Hungary – All spraying equipment, within a certain cubic capacity must be certified by a competent authority. A Certified Pest Protection Machinery Catalogue of all machinery is published on a regular basis to inform all professional users of available and approved machinery.

UK - The National Sprayer Testing Scheme (NSTS) was set up in 2001 as a voluntary sprayer testing scheme and in 2009-2010 sprayers accounting for the majority of the sprayed area in the UK were tested under this scheme. Tests are carried out on farm by approved testers. For smaller pesticide users a self-test option is available.

Aerial spraying



Directive 2009/128/EC (art. 9)

Aerial spraying should generally be prohibited with derogations possible where it represents clear advantages in terms of reduced impacts on human health and the environment in comparison with other spraying methods, or where there are no viable alternatives, provided that the best available technology to reduce drift is used.

- **Copa-Cogeca position**

In several cases, aerial spraying cannot be replaced by other crop protection techniques because of local constraints and regional conditions. Minimum requirements for aerial spraying must be included as part of good and responsible agricultural practice which respects the environment and biodiversity, including bees located in the area. Discussion is needed on the types of requirement which should be created, taking into account the economic and environmental value. A risk-based approach should be taken when considering aerial spraying requirements so that use of this technique is not prohibited per se for non-synthetic PPPs (e.g. bio-pesticides or biological pest control).

- **Examples of good practice:**

France - Operators are obliged to declare any kind of treatment in advance to local authorities. Treatment using PPPs which are classified as toxic (T) or very toxic (T+) are prohibited. It is compulsory to respect a minimum safety distance from gardens, houses, water supply pipes, parks, etc. For example, within the sweet corn supply chain, where aerial spraying is used to treat Mediterranean corn borer and European corn borer, a trapping network managed by competent authorities together with a technical institute provides valuable information to ascertain the optimum treatment day and the geographical areas where the harmful threshold has been exceeded. All information provided is double checked by field observations.

Hungary – Operators must meet very strict conditions before any kind of aerial treatment is permitted. A target map is needed in order to identify the affected area and all relevant issues within neighbouring areas: presence of urban areas, sensitive crops, livestock production units, environmental protected areas, national parks, grazing or feed production areas, sensitive areas covered by water, presence of public roads, etc. Operators must register all relevant data on weather conditions within a 5km radius in a flight book.

UK - Existing legislation for aerial spraying requires consultation with any relevant authorities including any residents within 25m of the boundary of the land to be treated and for notification signs to be put in place.



Specific measures to protect the aquatic environment and drinking water

Directive 2009/128/EC (art. 11)

Member States shall ensure that appropriate measures to protect the aquatic environment and drinking water supplies from the impact of PPPs are adopted. Those measures shall support and be compatible with the relevant provisions of Directive 2000/60/EC⁴ and Regulation (EC) No 1107/2009⁵.

- **Copa-Cogeca position**

Extra precautions or restrictions on the use of PPPs must be justified and farmers need to be compensated.

The implementation of the Water Framework Directive at river basin level, managed by the competent authorities, offers the opportunity for cost-effective and proportionate local approaches, provided that they do not become an alternative authorisation process. Harmonised legislation is crucial and duplication of legislative requirements must be avoided.

- **Existing best practice:**

Hungary – The government regulates the protection of aquatic environment and drinking water and also regulates the size of safety zones. There are three types of zones: A, B and C where the application of certain types of PPPs may be prohibited or restricted.

Latvia - Buffer zones within a certain minimum distance from water courses cannot be treated with any PPPs. Strict conditions of use are often placed on products to ensure that any risks associated with their use are reduced to an acceptable level.

Netherlands - Buffer zones and/or spray drift reducing techniques are compulsory along waterways.

Portugal – Buffer zones along underground water sources used for human consumption are mandatory. The immediate buffer zone forbids any kind of activity, while the larger buffer zone restricts certain activities, including the use of PPPs.

(4) Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy.

(5) Regulation (EC) No 1107/2009 of the European Parliament and of the Council of 21 October 2009 concerning the placing of plant protection products on the market and repealing Council Directives 79/117/EEC and 91/414/EEC.

Reduced or PPP-free zones



Directive 2009/128/EC (art.12)

Member States shall, having due regard for the necessary hygiene and public health requirements and biodiversity, or the results of relevant risk assessments, ensure that the use of PPPs is minimised or prohibited in certain specific areas. Appropriate risk management measures shall be taken and the use of low-risk plant protection products as defined in Regulation (EC) No 1107/2009 and biological control measures shall be considered in the first place.

- **Copa-Cogeca position**

The environmental impact of PPPs is already regulated by the authorisation process. Extra precautions or restrictions on the use of PPPs must be justified at national level. Moreover, farmers need to be compensated for the repercussions of restricted use. Farmers with fields in NATURA 2000 areas should still be allowed to continue to farm properly.

Creating reduced or PPP-free zones can have a huge impact on the local farming sector. Additional requirements leading to reduced or zero use, based on scientific evidence, should be adequately compensated. This compensation needs to be extended to cover extra labour, investment in equipment and possible income and crop loss.

- **Examples of good practice:**

UK - Existing schemes (e.g. Sites of Special Scientific Interest) already have restrictions in place which are site specific and allow problems to be controlled if necessary. This is far more appropriate than a total ban.

Handling and storage of PPPs



Directive 2009/128/EC (art.13)

Member States shall adopt the necessary measures to ensure that the following operations by professional users and where applicable by distributors do not endanger human health or the environment: (a) storage, handling, dilution and mixing of PPPs before application; (b) handling of packaging and remnants of PPPs; (c) disposal of tank mixtures remaining after application; (d) cleaning of the equipment used after application; (e) recovery or disposal of pesticide remnants and their packaging in accordance with Community legislation on waste.

- **Copa-Cogeca position**

Farmers must ensure that authorised PPPs are handled and stored in a responsible way. This is also in their interest. Any PPP used according to its instructions should not be harmful to public health, but should instead only provide a plant with a solution for a specific pest problem.

- **Examples of good practice:**

Belgium – PPPs should be stored in a secure, dry and well-ventilated place. They should also be far away from residential areas and inaccessible to children. They need to be labelled with warnings. Farmers are actively involved in the collection of empty PPP packages via the collection system established by Phytofar-recover.

France - Promotion of best practices is available at farm level, particularly through the training scheme “certiphyto”. A regular system is in place for the disposal of obsolete, empty or unused PPPs.

Latvia - Professional operators are responsible for handling and storing PPPs. Places where PPPs are stored need to be lockable, inaccessible to children and animals and separated from food products and fodders. It is the responsibility of the PPP user to comply with PPP label requirements.

Portugal – Strict conditions are in place for the storage of PPPs on farm, in storage before sale and in distribution storage. Twice a year farmers can deliver empty or unused packs of PPPs in transparent plastic bags which are distributed beforehand.

As part of cross-compliance measures, farmers must comply with proper storage and disposal measures for PPPs at reception centres. It is strictly forbidden to abandon, burn or bury PPPs outside these centres.

Common framework for integrated pest management (IPM)



Directive 2009/128/EC (art.14)

Member States shall establish or support the establishment of necessary conditions for the implementation of integrated pest management. In particular, they shall ensure that professional users have at their disposal information and tools for pest monitoring and decision making, as well as advisory services on integrated pest management.

By 30th June 2013, Member States shall report to the Commission on the implementation of paragraphs 1 and 2 and, in particular, whether the necessary conditions for implementation of integrated pest management are in place.

- **Copa-Cogeca position**

Integrated pest management is part of integrated crop management and is advocated by farmers' organisations. Integrated crop management is the cornerstone of sustainable farming systems, as long as both are based on economic viability, social acceptance and environmental friendliness.

Amending definitions to clarify and specify IPM is not the solution to the absence of a common understanding of the concept. If real, economically viable solutions were presented to farmers, 90% would put them into practice. IPM is not about definitions, but economics, risks and labour costs.

According to Copa-Cogeca, "IPM means managing, in a given situation, populations of plant pests, diseases and weeds by the combination of all appropriate agricultural practices (preventive measures, cultural, mechanical, biological and chemical practices), with a holistic approach that reduces the impact of pests and damage to an acceptable level and at the same time ensures the protection of human health and the environment"⁶.

We must accept that the market is looking for zero tolerance, in the interest of product quality. For example, apples with slight skin defects would struggle to find a market and if they did they would obtain a much lower price (for processing). They would not normally be bought by consumers. In other words, the economic threshold for certain products is often zero. The market allows no room for manoeuvre.

Solutions for growers must be available at all times for all problems. Several options are needed within multiple modes of action. Anti-resistance management is at risk due to the limited availability of PPPs on the market. Therefore, further improvements are needed. Decisions on which tools to use must be made at farm level and not dictated by fixed rules. The IPM approach has to be adapted to the production system and can only be effective if the decision is made on the ground.

A more practical approach is needed: demo fields, on-farm experimentation, extension services, and practical applied research.

(6) Integrated Pest Management: the perspective of partners in the food value chain (2010)



• **Examples of good practice:**

Belgium - IPM guidelines are already in place as an initial part of private production schemes for good agricultural practice. The horticultural-vegetable production scheme includes IPM as the primary mode of action. Advisory cards are available for vegetable crops and fruit based on IPM which permit biological control, environmental protection and the protection of the health of professional users. Each advisory card has a specific colour (white, green, yellow or red) indicating the environmental impact of those control methods applied by calculating the pesticide risk indicator POCER (Pesticide Occupational and Environmental Risk).

Germany - Integrated pest management is already part of national legislation. Crop and/or sector-specific guidelines on integrated pest management are also being developed and used by growers. For example, many IPM techniques have been in place for hops and it is only when cultural practices are not sufficient that plant protection products are considered. There are also two warning services, for peronospora and powdery mildew, to inform farmers about the emergency levels. Implementation of the guidelines is included in quality programmes or agri-environmental programmes.

Italy –National guidelines on IPM are in place for 117 crops. These guidelines provide a good basis for on-farm IPM application. Several projects have been implemented on the ground which aim at optimising the management of pests and reducing their environmental impact (e.g. FIORIBIO, Life + Sunflower - Sustainable Management of Floriculture in Western Coast)

Netherlands - IPM guidelines are part of private production schemes for good agricultural practice. At the start of the growing season, each grower is obliged to complete a crop protection plan for each crop grown. For field crops, information is based on certified and guaranteed disease-free seeds, starting material, seed treatment if available, decision support systems voluntarily used to support the control of fungal diseases and control measures for aphids, based on scouting and thresholds. For greenhouse crops, information is based on scouting and thresholds used to support the control of various harmful pests and natural predators used alongside PPPs and finally hygiene measures to prevent infestations and the spread of bacterial diseases and viruses.

Spain - Important developments have taken in recent years in alternative pest and disease control systems, such as the use of biological pheromones and sexual confusion controls. IPM techniques are in place in Seville for rice crops. Such techniques enable better pesticide use and a systematic reduction of PPPs (60-65%). The high cost of IPM is supported in part by the agri-environmental measures available in Spain.

Sweden – It has been suggested that IPM be implemented as part of a training programme. All PPP users shall attend a proper course for the current implementation of IPM and the eight principles⁷.

Slovakia - IPM has a long tradition of IPM guidelines especially as regards fruit, vegetables and grapes.



(7) (1) Measures for prevention and/or suppression of harmful organisms

(2) Tools for monitoring

(3) Threshold values as basis for decision-making

(4) Non-chemical methods to be preferred

(5) Target-specificity and minimization of side effects

(6) Reduction of use to necessary levels

(7) Application of anti-resistance strategies

(8) Records, monitoring, documentation and check of success

Quantitative use reduction

Directive 2009/128/EC

Member States shall adopt national action plans to set up their quantitative objectives, targets, measures and timetables to reduce risks and impacts of pesticide use on human health and the environment and to encourage the development and introduction of integrated pest management and of alternative approaches or techniques in order to reduce dependency on the use of PPPs.

- **Copa-Cogeca position**

Copa-Cogeca strongly believes that the focus should be on risk reduction and is opposed to the idea of a quantitative approach as such. Farmers should be able to make their own management decisions and ensure that authorised PPPs are used in a responsible way.

A quantitative approach would not take into account the fact that two applications of a substance targeting a specific problem could have a considerably reduced effect on the environment as compared to one application of a heavy “all purpose” product.

- **Examples of good practice:**

Germany - The ‘handling index’ defines the intensity of PPP use. Plant protection risk indicators are based first and foremost on risks to natural ecosystems. Using computer-based models, such as SYNOPS, relative changes in risks to aquatic and land-based ecosystems owing to PPP use can be calculated. The SYNOPS model is currently being developed to increase the scope to also take into consideration risks to users and the public.

UK – The examples of voluntary measures to promote best practice mentioned in this document have all focussed on risk reduction, not use reduction. Arbitrary use reduction targets do not take into account the importance of PPPs or the risks of alternative options, both chemical and particularly non-chemical control options.



Maximum residue levels (MRLs) are not an issue for national action plans (NAPs)

Copa-Cogeca strongly believes that maximum residue levels should not be regulated as an additional constraint on NAPs. MRLs are not a result of food safety measures but a result of good agricultural practice (cropping practices including rotation, choice of variety, sowing date, etc). MRLs are already covered by Regulation (EC) No. 396/2005 of the European Parliament and the Council of 23rd February 2005 on maximum residue levels of PPPs in or on food and feed of plant and animal origin. Here again, doubling up of regulations should be avoided.



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THE VOICE OF EUROPEAN FARMERS AND EUROPEAN AGRI-COOPERATIVES

Copa-Cogeca is the united voice of farmers and agri-cooperatives in the EU. Together, they ensure that EU agriculture is sustainable, innovative and competitive, guaranteeing food security to half a billion people throughout Europe. Copa represents over 13 million farmers and their families whilst Cogeca represents the interests of 38,000 agricultural cooperatives. They have 77 member organisations from the EU member states.



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