



European Economic and Social Committee

NAT/350
Statistics on plant
protection products

Brussels, 11 July 2007

OPINION

of the

European Economic and Social Committee

on the

Proposal for a Regulation of the European Parliament and of the Council
concerning statistics on plant protection products

COM(2006) 778 final – 2006/0258 (COD)

On 16 May 2007 the Council decided to consult the European Economic and Social Committee, under Article 285(1) of the Treaty establishing the European Community, on the

Proposal for a Regulation of the European Parliament and of the Council concerning statistics on plant protection products
COM(2006) 778 final – 2006/0258 (COD).

The Section for Agriculture, Rural Development and the Environment, which was responsible for preparing the Committee's work on the subject, adopted its opinion on 8 June 2007. The rapporteur was Mr van Oorschot.

At its 437th plenary session, held on 11 and 12 July 2007 (meeting of 11 July), the European Economic and Social Committee adopted the following opinion by 138 votes to 1 with 3 abstentions.

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1. **Summary of the EESC's conclusions and recommendations**

- 1.1 The EESC welcomes the proposed regulation as a means of measuring the progress made in the Member States towards the objectives of the framework directive¹ on the sustainable use of pesticides.
- 1.2 The EESC regrets that this regulation covers only the professional use of plant protection products in agriculture and does not include their potentially environmentally damaging use on hard surfaces.
- 1.3 The EESC would stress that, when linking data on use with data on the maximum residue level (MRL), it is not only the quantity of the substances used and the area of crop treated that are important, but also the crop yield. In order to ensure that data on use are linked to existing EU crop statistics, and in particular crop yields, explicit mention must be made of these crop statistics in the regulation.

¹ COM(2006) 373 final "Proposal for a Directive establishing a framework for Community action to achieve a sustainable use of pesticides".

2. **The Commission proposal**

- 2.1 The objective of the proposed regulation is to establish a framework for the production of Community statistics on the placing on the market and use of plant protection products by imposing an obligation on all the Member States to produce detailed statistics on a regular basis. To ensure the comparability of these statistics between Member States and at Community level, the regulation defines the coverage of the statistics, which will be limited to professional use in agriculture, and establishes harmonised rules for data collection and compilation.
- 2.2 These statistics will be essential for estimating the risk to human health and the environment linked to the use of plant protection products, and for measuring the progress made towards the objectives of the framework directive on the sustainable use of pesticides.
- 2.3 The benefits from this measure should be considered in the light of the overall framework directive. The general objective for the implementation of the measures of the framework directive is to achieve environment and health improvements or other societal benefits, such as the reduction of external costs due to the use of plant protection products, by means of a more sustainable use of pesticides. Measurement of the progress can only be based on reliable data and relevant indicators. Direct benefits of this regulation can be expected at national or Community level from a better knowledge of pesticide use, such as improved monitoring schemes and better targeted and more effective policies. Furthermore, the availability of official statistics all over Europe will create a more transparent market that should improve the competitiveness of the pesticide industry.

3. **Existing legal framework**

- 3.1 Regulation (EC) No 396/2005 of the European Parliament and of the Council of 23 February 2005 on maximum residue levels of pesticides in or on food and feed of plant and animal origin and amending Council Directive 91/414/EEC.
- 3.2 Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs, in particular Annex I, part A, point 9 establishing an obligation for food business operators producing or harvesting plant products to keep records on any use of plant protection products or biocides.
- 3.3 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.
- 3.4 Council Directive 91/414/EEC of 15 July 1991 concerning the placing of plant protection products on the market, which is currently under revision.

4. **Gist of the proposal**

4.1 The proposed regulation creates a legal framework and lays down harmonised rules for the collection and dissemination of data concerning the placing on the market and use of plant protection products. In particular, it instructs the Member States:

- to collect data regularly (annually as regards placing on the market, every five years as regards use);
- on how to collect data, whether by representative surveys, statistical estimation procedures on the basis of expert judgements or models, reporting obligations imposed on the distribution chain for plant protection products, reporting obligations imposed on professional users, from administrative sources or by a combination of these means;
- on how to transmit data to the Commission.

4.2 The proposal also entrusts the Commission with the tasks of adapting some technical aspects and defining the quality evaluation criteria and the data transmission format.

5. **General comments**

5.1 The EESC welcomes the proposed regulation as a means of measuring the progress made in the Member States towards the objectives of the framework directive on the sustainable use of pesticides.

6. **Specific comments**

6.1 Professional non-agricultural use

6.1.1 Data from the Dutch drinking water industry show that, in more than 50% of cases, non-compliance with drinking water standards is the result of the non-agricultural use of plant protection products on hard surfaces.

6.1.2 The statistics regulation makes it possible to estimate roughly the total non-agricultural use. This can be done by deducting from the total quantity of a product brought onto the market in a given year the total amount of professional agricultural use of the product concerned.

6.1.3 The EESC thinks that this indirect calculation of non-agricultural use is too inaccurate for a sound evaluation of the policy arising from the framework directive.

6.1.4 Besides the collection of data on professional agricultural use, the EESC therefore urges that the statistics regulation also be used for collecting data on the professional use of plant protection products in the forestry sector, professional use on hard surfaces and non-professional use.

6.2 Statistics regulations and MRL data

- 6.2.1 The EESC would stress that, when linking data on use with data on the maximum residue level (MRL), it is not only the quantity of the substances used and the area of crop treated that are important, but also the crop yield. The same quantity of substances used over the same area is less eco-efficient if there is a lower yield, increasing the risk of non-compliance with the MRL.
- 6.2.2 In Annex II of the proposal, reference is made to Council Regulation (EEC) No 571/88 on the organisation of Community surveys on the structure of agricultural holdings. The purpose of this reference is to use the same crop classification for both the farm structure surveys and the statistics on plant protection products. Statistics on the use of plant protection products can thus be linked effectively to the crop yield statistics.
- 6.2.3 The EESC acknowledges that reference to Council Regulation 571/88 offers the possibility of linking the data on use of plant protection products with the yield statistics of the crops concerned. In order to ensure that this possibility is actually used, the regulation should state explicitly that the crop statistics – and more specifically the crop yields – are to be used in the analysis of the data on these products.

Brussels, 11 July 2007.

The President
of the
European Economic and Social Committee

The Secretary-General
of the
European Economic and Social Committee

Dimitris Dimitriadis

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