

Kľúčové priority oz CEPTA k Nariadeniu o autorizácii ochranných prostriedkov rastlín (1) a Smernice pre trvaloudržateľné používanie pesticídov (2).

OZ CEPTA ako člen Pesticide Action Network Europe (PAN-Europe) verí v dobrý kompromis negociácií „pesticídového balíčku“ európskej legislatívy, ktorá je momentálne na stole zainteresovaných strán v Bruseli. Navrhujeme rad priorít, ktoré považujeme za kľúčové v oblasti používania pesticídov, ktoré odzneli v environmentálnej komisii Európskeho parlamentu v prípade ochrany včiel, i niektoré na viac.

Dolu nižšie popisujeme pripomienky pre konkrétne články navrhovanej legislatívy tak, ako sme sa dohodli na európskej platforme organizácií zastrešených PAN- Europe.

- komplexné „cut off“ kritériá, zohľadňujúce súčasne poznanie vplyvu pesticídov tak na ľudské zdravie ako aj prírodné ekosystémy so zdôraznením ochrany včiel, kľúčovým opoľujúcim hmyzom pre veľkú časť dominantných plodín i v SR
- ponechať členským štátom právo rozhodovať o autorizácii účinných látok
- definovať povinný princíp substitúcie a jasné ciele pre redukciu používania prípravkov s nebezpečnými účinnými látkami
- prijať dobrý a povinný systém integrovaného manažmentu škodcov (IPM), v kontexte integrovaného manažmentu plodín s uprednostnením nechemickej ochrany rastlín, keďže táto priorita ostáva mimo praxe viacerých európskych systémov integrovanej produkcie.

Naše pripomienky sme pripravovali po konzultácii s odborníkmi a po analýze existujúceho stavu v jednotlivých členských krajinách EÚ s cieľom priblížiť európske poľnohospodárstvo k udržateľnejšiemu systému produkcie so zameraním na kvalitu a minimalizáciu negatívnych dopadov tak na ľudské zdravie ako i prírodné ekosystémy.

1. Regulation on authorization of plant production products:

Ensure strict cut offs especially

A solid health protection enlarging the common position on cut offs to cover a specific reference to **combination toxicity** (inspired by EP compromise amendment B17) and the fact that an active substance should not be **toxic to reproduction category 3** (inspired by EP compromise amendment B18). Also there is a need to **limit the derogation** to ensure that it should only cover a serious danger of interest to the public to control, that the derogation shall never apply to active substances classified as carcinogenic category 1, carcinogenic category 2 without a threshold or toxic for reproduction category 1. The derogation must be limited in time, not allowed more than once, and **always including a clear substitution plan with specification on how to use non-chemical means** (inspired by EP compromise amendment B16).

Protect children in vulnerable early phase.

To **give specific attention to the children's brain development** a starting point is to eliminate active substances which cause a **significant risk of developmental neurotoxic or immunotoxic properties** in humans as a risk assessment approach (based on EP compromise amendment B19). The compromise amendment is now based on risk assessment and no longer on cut-off

Finally, there is a need to go further for bees by adding:

An active substance, safener or synergist shall only be approved if, on the basis of the agreed test guidelines or other available data and information, including a review of the scientific literature, reviewed by the Authority, it is not considered to have acute or chronic, lethal or sublethal effects on the bees, the bees larvae and the colony, unless the exposure of bees to that active substance,

safener or synergist in a plant protection product, under realistic proposed conditions of use, is negligible.

To develop a solid substitution plan based on EP compromise package C, with a specific reference to **substitution for bees** should be added as follow:

An active substance shall be approved as a candidate for substitution pursuant to Article 24 where any of the following conditions are met:

- if the substance is systemic in foraged plants and present in the foraged matrices at a concentration that is significant regarding the acute or chronic LD50 for the considered pollinator species

Reconsider the idea of zones, especially:

Take seriously account of the environmental differences within the EU by allowing Member States the possibility **to refuse any authorization of the plant production products causing a potential problem in their territory** (based on EP compromise amendment A6), and allowing Member States **to refuse an authorization if it will counteract the objective of the National Action Plan** (inspired by EP consolidated amendment 15).

Ensure a harmonized public participation in the authorization process by making sure that **any stakeholders has a right to challenge a Member State decision to accept or refuse an authorization** (as proposed in last paragraph of EP compromise amendment A7), rather than what is mentioned in the Common position where only industry has a right to challenge the environmental friendly decisions.

2. Framework Directive on sustainable use of pesticides:

To ensure the establishment of an ambitious framework directive on use, PAN would like to give special attention to following amendments agreed by the Environment Committee during its vote the 5 November:

A specific reference to **the precautionary principle** (in line with EP amendment 32, art. 2.2b) and setting **clearer objectives in the NAPs** (inspired by EP amendment 48, art.4.1.2)

Introduce an **overall use reduction target for MS** to fix the specific number but with 50% of most hazard substances (the pesticides which will be included in list of cut offs from 2016) (based on EP compromise amendment 2) by highlighting the importance of use reduction target and a specific reference to the treatment frequency index (as proposed in EP amendment 41, art. 3.9b). A risk assessment approach is tried in several Member States and only leads to wide debates and was never successfully implemented.

Introduce at the very least a **good definition on IPM and non chemical treatment** (in line with EP amendments 3, art. 3.7a, and 36, art. 3.6) as well as some specific references to **priority to non chemical treatment** (in line with EP amendment 29, art 1 and especially EP amendment 86, art. 13.1).

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