



Council of the  
European Union

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**LIMITE**

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PESTICIDE 42  
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AGRILEG 180  
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### **CONTRIBUTION**

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From: General Secretariat of the Council

To: Delegations

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Subject: Working Party on Plants and Plant Health Questions (Pesticides/Plant Protection Products) on 14 September 2023 - Presidency Steering Note - Comments from EL

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Delegations will find in annex comments from Greece on the above subject.

PRESIDENCY STEERING NOTE FOR WP 14 SEPTEMBER 2023

COMMENTS By EL

Greece welcomes the call of the Spanish presidency for thoughtful proposals on the thorny issue of sensitive areas.

Before addressing the specific questions put down by the Presidency, that we look forward to discussing at the upcoming Working Party and sending you our written responses afterwards, we would like to remind MS and COM of certain of the Council Conclusions on the Farm to Fork Strategy\*, to which COM has not responded with proposals as ambitious and effective as was expected.

To be more specific, COM, while precipitately proposes the SUR for the EU farmers, fails to provide even a roadmap on how the EU trade policy could contribute to enhancing cooperation with third countries in the sustainable use of plant protection products, as a way to alleviate the unfair competition against EU farmers, who are not allowed to use hundreds of actives of PPP, which are available to farmers in those countries, and even facilitated to be used for the production of food and feed imported in the EU, by the habitual establishment of import tolerances for actives that are withdrawn from the EU.

Regarding the sensitive areas, we are of the opinion that it is an unjustified measure, that not only undermines the EU regime for the authorisation of PPP, but is also unnecessary as demonstrated by many MSs' achievements, including Greece, which already have an intensity of PPP use lower than our common 2030 goal.

This position is encapsulated in our fundamental principle that blanket measures are evidently unproportionate, and any restrictions, qualitative or quantitative, should be applied at the extent to which there are individual objectives to be met.

Furthermore, we wish to use this opportunity to reiterate our position in favor of subsidiarity in the interpretation of the conflict of interest between the sales and the advice on the use of PPP, the coupling of which at retailer's level is a key driver of our national success at minimising the use of PPP, and therefore an apparent best practice which we need to safeguard against uneducated and populist opinions.

Finally, we want to state once more that failure to establish a Standing Committee group, dedicated to the fine tuning of the Sustainable Use of PPP, through the drafting and adoption of appropriate guidelines, is a regrettable repetition of the SUD's oversight, which prompted much of the criticism regarding the lack of harmonised evidence of its accomplishments.

<https://www.consilium.europa.eu/media/46419/st12099-en20.pdf?fbclid=IwAR0HKvbiqS6x6hz1oqzvVd-DfagCnbNjg7ndRH3I4MO9-qWb8dH5uy95NqU>