



Council of the  
European Union

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**PESTICIDE 50**  
**SEMENCES 151**  
**ENV 872**  
**PHYTOSAN 175**

**NOTE**

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From: General Secretariat of the Council  
To: Council

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Subject: Need for a derogation of the obligatory e-registering system for the use of  
plant protection products  
*- Information from Poland*

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Delegations will find in the Annex a note from Poland on the above-mentioned subject which will be dealt with under "Any other business" at the Council meeting ("Agriculture and Fisheries") on 23 September 2024.

**Need for a derogation of the obligatory e-registering system for the use of plant protection products****Information from Poland**

2024 has been the year of farmers protesting against growing bureaucracy. Various policies delivered by the EU have resulted in an enormous administrative burden which is considered impossible to handle by the agricultural sector. Our farmers have been facing more and more time consuming requirements disconnecting them from their main activities. These activities are crucial for securing the EU's food sovereignty.

The upcoming obligation laid down in the Commission Implementing Regulation 2023/564 to register in the electronic format the use of plant protection products is perceived as the unnecessary and unjustified burden. The said legislative act imposes the requirement of the recording of more information than provided for in Article 67 of the Regulation 1107/2009 (like BBCH stages for example). Moreover, the purpose of adopting the aforementioned regulation was to provide data for statistical analysis. The regulation itself is not aimed at improving significantly the control-of the use of plant protection products. The current provisions of the Regulation 1107/2009 have already given the national authorities a tool for an efficient and effective control in this field. Therefore any further obligations are seen as far too excessive.

It has to be underlined that the proper implementation of the Commission Implementing Regulation 2023/564 needs more than 2 years. The appropriate electronic tools should be established, validated and implemented by the Member States. Farmers need to be informed and trained on how to register the use of plant protection products according to the new rules. This process requires more time than the period provided. Otherwise, the data obtained by the electronic system would be incomplete, uncertain and thus useless for the statistical purposes.

In light of the above, we call on the Commission to initiate the legislative procedure to postpone the entry into force of the Regulation 2023/564 for another 2 years. This time is necessary to accomplish building the appropriate IT tools and to effectively communicate the new legal provisions to the farmers. Our main goal should be the legal clarity and wide acceptance for the legislation in force.

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