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From:	General Secretariat of the Council
To:	Delegations
Subject:	Proposal for a REGULATION ON THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the sustainable use of plant protection products and amending Regulation (EU) 2021/2115 - comments on Integrated Pest Management from Hungary

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

Comments from Hungary**Integrated Pest Management (Chapter IV)****Article 13**

In our opinion, the implementation of **integrated pest management** contributes to the greatest extent to the reduction of risks arising from plant protection products, as well as to the minimized usage. With the full implementation of IPM, chemical plant protection agents are only applied when absolutely necessary.

In the Article 13 in paragraph 2 there is an expression “**ecological infrastructure**”. In our opinion, it is necessary to clarify the meaning of this expression among the definitions in the 1st Chapter.

In the case of paragraph 8 point “a”, we suggest keeping the original wording of the current SUD (2009/128/EC).

Article 12 and Article 15 (crop-specific rules)

We support the development of **culture-specific guidelines applicable** in IPM. In our opinion, guidelines for the most important crops can help farmers and advisors. However, we cannot support their mandatory compliance. We consider education to be our primary goal, since profound, long-term changes can only be achieved by shaping attitudes and imparting knowledge. In our opinion, these guides should be provided as a recommendation for users and advisors, as unexpected situations can always arise in practice. We do not support the annual review either, as this increases the administrative burden. The list of authorised active substances is constantly changing, therefore we don't suggest to publish concrete pesticides in crop-specific rules. In our opinion, the crop specific rules should include the reference to the list of authorised plant protection products. In accordance with this position we suggest to amend **Article 12** and **Article 15**.

Article 14 and Article 16 (IPM electronic register system)

In our opinion, the implementation and control of IPM can be supported by an electronic register system and registration interface, so we basically support its introduction.

We consider it extremely important that disproportionate administrative burdens do not fall on either the Commission or the Member State authorities. That is why we do not support the preparation of an annual analysis and summary. Therefore we suggest to delete paragraph 4 in Article 16.

The annual obligation may lead to wrong conclusions due to year-to-year monitoring. We cannot draw conclusions about trends yearly.