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NOTE

From:	General Secretariat of the Council
To:	Delegations
Subject:	AOB item for the meeting of the "Agriculture and Fisheries" Council of 17 November 2025: Statistics on the use of plant protection products (according to EU SAIO) – <i>Information from Germany, supported by Czechia, Luxembourg and Romania</i>

SAIO Regulation (EU) 2022/2379 on statistics on agricultural inputs and production entered into force in 2022 and requires detailed monitoring of the use of plant protection products from 2028 onwards.

Germany is committed to reducing dependency on plant protection products and their use. Professional users of plant protection products are already making great efforts in this regard. The monitoring of these activities requires statistically representative data which, however, must be obtained as efficiently as possible, must be limited to what is strictly necessary and must take into account European and national bureaucracy-reduction targets.

Coordinating data collection for SAIO with existing control procedures in an efficient way is a challenge. The technical application controls are risk-based and do not aim to be statistically representative.

However, the SAIO stipulates that, for a number of crop species, the application data of the holdings must be evaluated in each case, resulting in additional control or evaluation effort compared with the technical controls.

On the other hand, the alternative possibility of having the application data collected by the statistical authorities bears the risk of duplicate surveys on farm level, i.e. additional queries by the statistical authorities in addition to the risk-based specialist controls.

The Commission is already discussing proposals with Member States on extending the list of crop species before the obligation to provide regular statistics on the use of plant protection products has even started.

At its meeting from 1 to 3 October 2025, the Standing Committee on Plants, Animals, Food and Feed (SCoPAFF) unanimously adopted the Commission proposal to amend Implementing Regulation (EU) 2023/564, which gives Member States the option to postpone the introduction of the electronic record-keeping requirement for the use of plant protection products from 1 January 2026 to 1 January 2027. Germany will use this option.

Against this background, Germany advocates that, as with the obligation for electronic record-keeping, the possibility should be created to extend the transitional period by one year and to postpone the requirement to submit plant protection application statistics under Article 14(2) of the SAIO Regulation until one year later, starting in 2029.

In addition, no further extensions of the list of crop species should be discussed; instead, the envisaged **statistical obligations should be reduced to an absolutely necessary minimum**; in the interests of efficiently reducing red tape, this should also include examining a possible repeal of the SAIO requirements relating to plant protection products, insofar as these go beyond existing requirements from other regulatory areas.