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European Union

Brussels, 15 February 2023
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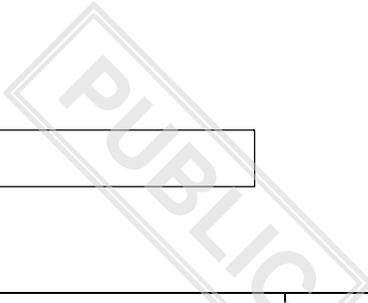
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WORKING DOCUMENT

From: General Secretariat of the Council
To: Delegations

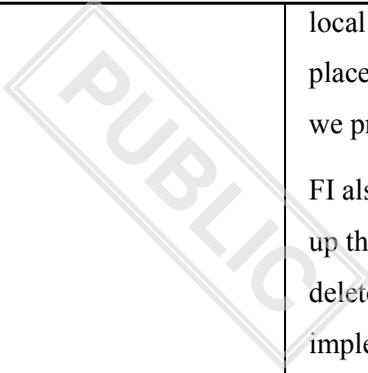
Subject: Proposal for a REGULATION ON THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the sustainable use of plant protection products and amending Regulation (EU) 2021/2115 - Follow up to the Working Party on Plants and Plant Health Questions (Pesticides/Plant Protection Products) on 27 January 2023 – comments from Finland on IPM

Delegations will find in annex comments from Finland on articles 13, 15, 16 and 17.



Member State: Finland	
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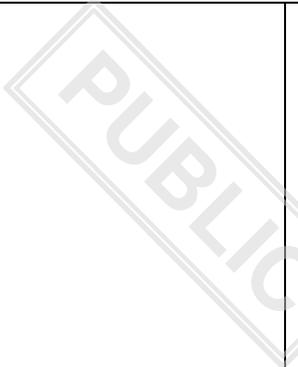
Commission proposal (SUR)	Drafting Suggestions	Comments
<p><i>Article 13</i></p> <p>Obligations of professional users and advisors related to integrated pest management</p>	<p><i>Article 13</i></p> <p>Obligations of professional users and advisors related to General guidelines on integrated pest management</p>	<p>Article 12 guides professional users to either apply integrated pest management by applying the crop-specific guidelines described in article 15 and if there are no such, to apply article 13. The idea of general guidelines is to guide the grower of crops in the area of crop protection. Therefore, we propose to change the title of Article 13 accordingly.</p>
<p><i>Article 15</i></p> <p>Implementation of integrated pest management using crop-specific rules</p>	<p><i>Article 15</i></p> <p>Crop-specific guidelines on integrated pest management Implementation of integrated pest management using crop-specific rules</p>	<p>General comment on integrated pest management</p> <p>As a general comment, FI wishes to point out that the provisions should be clearly written.</p> <p>FI emphasizes that it is challenging to make the rules on integrated pest management binding, because the selection of actions is always based on</p>



		<p>local circumstances and the conditions vary from place to place and from time to time. Therefore, we propose setting up guidelines instead of rules.</p> <p>FI also reads the article as instructions on setting up the guidelines and therefore we propose to delete the word “implementation” in the title. The implementation is done by professional users, based on Article 12.</p>
<p>1. Member States shall adopt agronomic requirements based on integrated pest management controls that must be adhered to when growing or storing a particular crop and are designed to ensure that chemical crop protection is only used after all other non-chemical methods have been exhausted and when a threshold for intervention is reached (‘crop-specific rules’). The crop-specific rules shall implement the principles of integrated pest management, set out in Article 13, for the relevant crop and be set out in a binding legal act.</p>	<p>1. Member States shall adopt agronomic requirements based on crop-specific guidelines on integrated pest management controls that must be adhered to when growing or storing a particular crop and are designed to ensure that chemical crop protection is only used after all other non-chemical methods have been exhausted and when a threshold for intervention is reached (‘crop-specific rules’).-The crop-specific guidelines rules shall implement be based on the principles of integrated pest management, set out in Article 13, for the</p>	<p>FI is of the opinion that it is not clear what Article 15, paragraph 1 means – whether the requirements are based on pest control requirements or requirements for control. The reason for this uncertainty may well be that the translation of the first sentence into Finnish / Swedish has not been entirely successful.</p> <p>FI also considers that IPM is not suitable in the format of a rule, but should be kept as guidelines. FI stresses that it is challenging to make binding rules on integrated pest management, because the selection of actions is</p>

	<p>relevant crop and be set out in a binding legal act.</p> <p><i>IF considered important, the final part of the paragraph could read:</i></p> <p>The crop-specific guidelines, which farmers have to apply in their cultivation and storage of particular crops, rules shall implement be based on the principles of integrated pest management, set out in Article 13, for the relevant crop and be set out in a binding legal act.</p>	<p>always based on local circumstances and the conditions vary from place to place and from time to time.</p> <p>The COM proposal contains in para 1 both a requirement to set up IPM rules and a requirement to apply them. The requirement to apply them is already included in Article 12 para 1. To clarify the text, we propose that paragraph 1 be simplified.</p> <p>Fi proposes that the guidelines on IPM be done at national level to best take into consideration local circumstances.</p>
<p>2. Each Member State shall designate a competent authority responsible for ensuring that the crop-specific rules are scientifically robust and comply with this Article.</p>	<p>2. Each Member State shall designate a competent authority responsible for ensuring that the crop-specific guidelines rules are scientifically robust and comply with this Article.</p>	<p>As described above, we propose crop-specific guidelines instead of rules.</p>

<p>3. By ... [OP: please insert the date = the first day in the month following 24 months after the date of entry into force of this Regulation] each Member State shall have in place effective and enforceable crop-specific rules, for crops covering an area that accounts for at least 90 % of its utilised agricultural area (excluding kitchen gardens). Member States shall determine the geographic scope of those rules taking account of relevant agronomic conditions, including, the type of soil and crops and the prevailing climatic conditions.</p>	<p>3. By ... [OP: please insert the date = the first day in the month following 24 36/48 months after the date of entry into force of this Regulation] each Member State shall have in place effective and enforceable crop-specific guidelinesrules, for crops covering an area that accounts for at least 90 % of its utilised agricultural area (excluding kitchen gardens). Member States shall determine the geographic scope of those rules taking account of relevant agronomic conditions, including, the type of soil and crops and the prevailing climatic conditions.</p>	<p>FI considers that the time limit for Article 15, paragraph 3, is too strict to establish crop-specific guidelines. Making such crop-specific guidelines requires solid scientific competence, sufficient financial resources and time. Many plant pests lack threshold values or other measurable criteria. Producing such takes several years, and it may be difficult to obtain funding for developing the threshold values for plant pests of smaller crops. A stepwise progress could be possible. From the perspective of a small Member State, at least 48 months should be reserved for achieving all the guidelines. They could be set up through a stepwise approach. As a follow-up to this amendment to the time limit, the time limit for reporting by the Commission to the Parliament and the Council of paragraph 13 of this Article should also be changed. The deadline for reporting could be 10 years so that the Member States can first establish the crop-specific guidelines, after which they can start accumulating experience so that the Commission has something to report on.</p>
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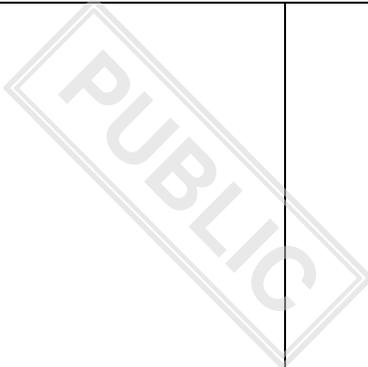
		<p>The proposal requires MS to set up crop-specific guidelines for crops covering an area that accounts for at least 90 % of its utilized agricultural area.</p> <p>This might lead to a situation where guidelines are set up only for crops grown on large areas, whereas smaller specialty crops, possibly requiring several treatments with ppps and thus contributing more to the environmental load compared to general field crops with less crop protection needs, despite larger cultivation areas, are left without guidelines. This cannot be seen as a good outcome.</p> <p>We propose considering a stepwise approach to establish and adopt crop-specific IPM guidelines, both to enable the work in MS and as an alternative to the 90 % agricultural area measurement. The first guidelines could have to be completed in 36 months and the rest in 48 months.</p>
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<p>4. At least 9 months prior to the point in time when a crop-specific rule becomes applicable under national law, the Member State shall perform all of the following actions:</p> <p>(a) publish a draft for public consultation;</p> <p>(b) take into account comments received from stakeholders and members of the public on the draft in a transparent manner;</p> <p>(c) submit the draft that takes into account the comments as referred to in point (b) to the Commission.</p>	<p>4. At least 9 months prior to the point in time when a crop-specific rule becomes applicable under national law, the Member State shall perform all of the following actions:</p> <p>adopt crop-specific guidelines. In the preparation of the guidelines the Member States shall</p> <p>(a) involve stakeholders and</p> <p>(b) take account of new research.</p> <p>(a) publish a draft for public consultation;</p> <p>(b) take into account comments received from stakeholders and members of the public on the draft in a transparent manner;</p> <p>(c) submit the draft that takes into account the comments as referred to in point (b) to the Commission.</p>	<p>In addition, paragraph 4 of the Article will increase the timetable challenge if public consultations and submission of the draft to the Commission are required before the guidelines are adopted. The requirement to send the draft to the Commission 9 months before its introduction means that a public consultation must be held more than one year before the guidelines are intended to be introduced. This will leave a very short time for the preparations. FI considers the proposed method of approving guidelines slow and bureaucratic and proposes that the guidelines be approved nationally. In the preparatory work stakeholders shall be involved and new research shall be taken into account. Public consultation is a normal part of national preparatory work. Of course, the adopted guidelines can be sent to the Commission for information.</p>

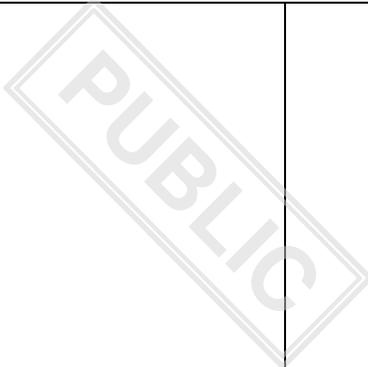
<p>5. Where the Commission is notified of a draft in accordance with paragraph 4, point (c), it may within 6 months of receipt of the draft object to its adoption by a Member State, if it considers that the draft does not comply with the criteria set out in paragraph 6. If the Commission objects, the Member State shall refrain from adopting the draft until it has amended the text so as to remedy the shortcomings identified in the Commission's objections. The absence of a reaction from the Commission in accordance with this paragraph to a draft crop-specific rule shall not prejudice any action or decision which might be taken by the Commission under other Union acts.</p>	<p>5. Where the Commission is notified of a draft in accordance with paragraph 4, point (c), it may within 6 months of receipt of the draft object to its adoption by a Member State, if it considers that the draft does not comply with the criteria set out in paragraph 6. If the Commission objects, the Member State shall refrain from adopting the draft until it has amended the text so as to remedy the shortcomings identified in the Commission's objections. The absence of a reaction from the Commission in accordance with this paragraph to a draft crop-specific rule shall not prejudice any action or decision which might be taken by the Commission under other Union acts.</p>	<p>Referring to comments on paragraph 4, this paragraph should be deleted.</p>
<p>6. The crop-specific rules shall convert the requirements of integrated pest management laid down in Article 13 into verifiable criteria by, among others, specifying the following:</p> <p>(a) the most economically significant harmful organisms affecting the crop;</p>	<p>6. The crop-specific guidelines rules shall convert the requirements of integrated pest management laid down in Article 13 into verifiable criteria by, among others, specifying the following:</p>	<p>The sub-paragraphs of paragraph 6 are generally considered justified, but the range of plant protection products on the market in a small country is often so small that the selection of alternative plant protection products is minimal. FI also notes that the annual updating of the crop-specific guidelines will add to the workload of the authorities.</p> <p>Integrated pest management is a decision support system, which is difficult to turn into verifiable criteria without losing its meaning. Proposal to delete</p>

		the word “verifiable”.
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<p>(b) the non-chemical interventions involving cultural, physical and biological control which are effective against the harmful organisms referred to in point (a) and qualitative criteria or conditions under which these interventions are to be made;</p> <p>(c) the low-risk plant protection products or alternatives to chemical plant protection products which are effective against the harmful organisms referred to in point (a) and qualitative criteria or conditions under which these interventions are to be made;</p> <p>(d) chemical plant protection products that are not low-risk plant protection products and that are effective against the harmful organisms referred to in point (a) and qualitative criteria or conditions under which these interventions are to be made;</p> <p>(e) the quantitative criteria or conditions under which chemical plant protection products may be used after all other means of control that do not require the use of chemical plant protection products have been exhausted;</p> <p>(f) the measurable criteria or conditions under which</p>		
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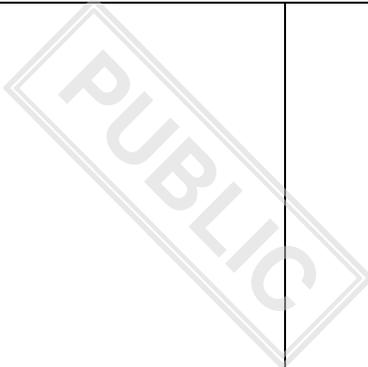


<p>more hazardous plant protection products may be used after all other means of control that do not require the use of chemical plant protection products have been exhausted.</p> <p>(g) the obligation to record observations demonstrating that the relevant threshold value has been reached.</p>		
<p>7. Each Member State shall review its crop-specific rules annually and update them where necessary, including when it is needed to reflect changes in the availability of harmful organism control tools.</p>	<p>7. Each Member State shall review and update its crop-specific rules annually and update them where necessary, including when it is needed to reflect changes in the availability of harmful organism control tools.</p>	<p>FI considers that the yearly updating will be burdensome and prefers to do updates when needed. “Where necessary” includes changes in the pest abundance or behaviour, changes in the availability of pest control tools, relevant new research etc. All of these should be considered when updating the guidelines. It is difficult to produce a complete list of all possibilities where an update would be necessary, so we propose to delete the example and only refer to “where necessary”.</p>

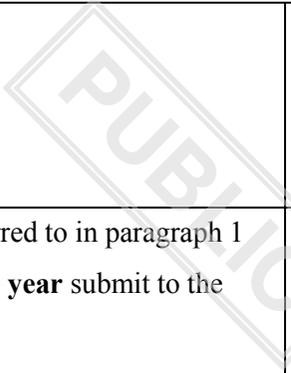
<p>8. A Member State that is planning to update a crop-specific rule shall, at least 6 months before the update becomes applicable under national law:</p> <p>(a) publish a draft of the updated rules for public consultation;</p> <p>(b) take into account comments received from stakeholders and members of the public on the draft in a transparent manner;</p> <p>(c) submit the draft that takes into account the comments as referred to in point (b) to the</p>	<p>8. A Member State that is planning to update a crop-specific rule shall, at least 6 months before the update becomes applicable under national law:</p> <p>(d) publish a draft of the updated rules for public consultation;</p> <p>(e) take into account comments received from stakeholders and members of the public on the draft in a transparent manner;</p> <p>(f) submit the draft that takes into account the comments as referred to in point (b) to the</p>	<p>Referring to comments on paragraph 4, this paragraph should be deleted.</p>
<p>Commission.</p>	<p>Commission.</p>	

<p>9. Where the Commission is notified of a draft under paragraph 8, it may within 3 months of receipt of the draft object to the updating of the crop-specific rule by a Member State, if it considers that the draft does not comply with the criteria set out in paragraph 6. If the Commission objects, the Member State shall refrain from updating the crop-specific rule until it has amended the text so as to remedy the shortcomings identified in the Commission's objections. The absence of a reaction from the Commission in accordance with this paragraph to a draft crop-specific rule shall not prejudice any action or decision which might be taken by the Commission under other Union acts.</p>	<p>9. Where the Commission is notified of a draft under paragraph 8, it may within 3 months of receipt of the draft object to the updating of the crop-specific rule by a Member State, if it considers that the draft does not comply with the criteria set out in paragraph 6. If the Commission objects, the Member State shall refrain from updating the crop-specific rule until it has amended the text so as to remedy the shortcomings identified in the Commission's objections. The absence of a reaction from the Commission in accordance with this paragraph to a draft crop-specific rule shall not prejudice any action or decision which might be taken by the Commission under other Union acts.</p>	<p>Referring to comments on paragraph 4, this paragraph should be deleted.</p>
<p>10. A Member State with significant climatic or agronomic differences between regions, shall adopt crop-specific rules for each of those regions.</p>	<p>10. A Member State with significant climatic or agronomic differences between regions, shall adopt crop-specific guidelines rules for each of those regions.</p>	
<p>11. Each Member State shall publish all of its crop-specific rules on a single website.</p>	<p>11. Each Member State shall publish all of its crop-specific guidelines rules on a single website.</p>	
<p>12. The Commission shall publish on a website links to the websites referred to in paragraph 11 of the</p>		

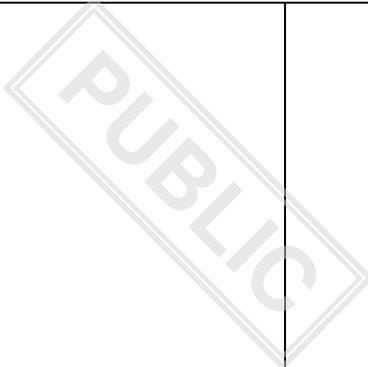
Member States.		
13. By ... [<i>OP: please insert the date = the first day of the month following 7 years after the date of entry into force of this Regulation</i>], the Commission shall submit a report to the European Parliament and the Council on the adoption and enforcement of crop-specific rules in the Member States and the compliance of those rules with Article 15.	13. By ... [<i>OP: please insert the date = the first day of the month following 10 7 years after the date of entry into force of this Regulation</i>], the Commission shall submit a report to the European Parliament and the Council on the adoption and enforcement of crop-specific rules in the Member States and the compliance of those rules with Article 15.	See paragraph 3 for reasoning.
Article 16 Electronic integrated pest management and plant protection product use register		
1. Each Member State shall designate a competent authority or competent authorities to establish and maintain an electronic integrated pest management and plant protection product use register or registers. The electronic integrated pest management and plant protection product use register or registers shall contain all of the following information for a period of at least 3 years from date of entry:		FI considers that the authority maintaining the register in article 16.1 may be different from the supervisory authority in paragraph 3. The list in paragraph 1 of the Article could be clarified by dividing the subparagraph c in two – information on use of ppps separately and information on the use of aerial application separately.



<p>a) any preventative measure or intervention and the reasons for that preventative measure or intervention entered in accordance with Article 14(1);</p> <p>b) the name of the advisor and dates and content of advice entered in accordance with Article 14(2);</p> <p>c) an electronic record of each application of a plant protection product under Article 67 of Regulation (EC) No 1107/2009 and a report on any aerial application carried out under Article 20, as required by Article 14(3).</p>	<p>c) an electronic record of each application of a plant protection product under Article 67 of Regulation (EC) No 1107/2009 and</p> <p>d) a report on any aerial application carried out under Article 20, as required by Article 14(3).</p>	
<p>2. The register(s) referred to in paragraph 1 shall be accessible to professional users so that they are able to enter the electronic records in accordance with Article 14.</p>	<p>2. The professional users shall have access to the electronic register referred to in paragraph 1. The professional users shall enter the information laid out in Article 14 in this register. The register(s) referred to in paragraph 1 shall be accessible to professional users so that they are able to enter the electronic records in accordance with Article 14.</p>	<p>In paragraph 2 of the Article, it would be clearer to write directly that the professional user shall record the use of plant protection products in an electronic register. To enable this, the professional user must have access to the register.</p>
<p>3. Competent authorities referred to in paragraph 1 shall verify compliance of professional users with Article 14.</p>	<p>3. The competent authorities referred to in paragraph 1 shall verify compliance of professional users with Article 14.</p>	<p>FI considers that the authority maintaining the register in article 16.1 may be different from the supervisory authority in paragraph 3.</p>



		FI also questions if there is a need for paragraph 3? The regulation on official control already requires that obligations are controlled. If not clearly needed, the paragraph could be deleted.
4. Competent authorities referred to in paragraph 1 shall, once a year submit to the Commission a	4. Competent authorities referred to in paragraph 1 shall, once a year every three year submit to the Commission a	FI also considers it very difficult to comment on the requirement of Article 16, paragraph 4 the annual summary submitted to the Commission without knowing what it means in more detail and what it will look like. The requirement appears very demanding, and FI considers that there is reason to move from annual reports to a less frequent schedule to enable the authorities to perform all new administrative tasks. What kind of a plan does the Commission have for the standard model in paragraph 7?
summary and analysis of the information collected under Article 14 and of any additional data on use of plant protection products gathered in accordance with Article 67 of Regulation (EC) No 1107/2009.		



<p>5. Competent authorities referred to in paragraph 1 shall share the data gathered under paragraph 1, points (a) and (c), of this Article with the national competent authorities in charge of the implementation of Directives 2000/60/EC and (EU) 2020/2184 for cross-linking that data, in anonymised form, with environmental, groundwater and water quality monitoring data, to enhance the identification, measuring and reduction of risks from the use of plant protection products.</p>		
<p>6. Competent authorities referred to in paragraph 1 shall ensure access to the register(s) referred to in paragraph 1 to national statistical authorities for the development, production and dissemination of official statistics.</p>		
<p>7. In order to ensure a uniform structure of the summary and analysis referred to in paragraph 4, the Commission may, by means of implementing acts, adopt a standard template for such summary and</p>		

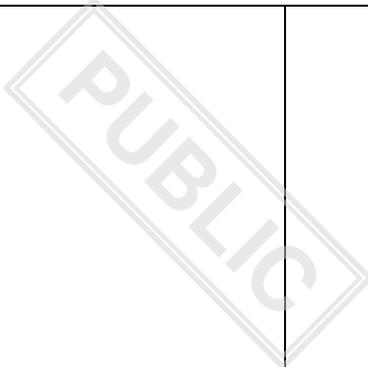
<p>analysis. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 41(2).</p>		
<p>CHAPTER V USE, STORAGE AND DISPOSAL OF PLANT PROTECTION PRODUCTS</p>		
<p><i>Article 17</i> General requirements for the use of plant protection products for professional use and of application equipment in professional use</p>	<p>Proposals for a definition in Article 3 of the term “trained professional user” proposal 1: ‘trained professional user’: means a person who has passed the test/exam in Article xx showing he/she has acquired the knowledge and skills/proficiency needed to be able to use and handle plant protection products authorised for professional use</p> <p>proposal 2: ‘trained professional user’: means a person who has been issued with a training certificate for following courses for professional users in accordance with Article 25, or has a proof of entry in a central electronic register for following such courses in accordance with Article 25(5)</p>	<p>FI proposes that the different ways of showing that a professional user is trained could be moved to a definition in Article 3. Then a shorter term “trained professional user” could be used for the sake of clarity of the text, see proposal 2 on the left. The text in proposal 2 on the left does not, however, take into account the proposal to introduce a test or an exam as the means to show that a professional user has acquired the knowledge and skills/proficiency needed to be able to use and handle ppps for professional use. The proposal on an obligatory test/exam and voluntary training would require another definition, see proposal 1 on the left.</p>

<p>1. A plant protection product authorised for professional use may only be used by a professional user who:</p> <p>(a) has been issued with a training certificate for following courses for professional users in accordance with Article 25, or has a proof of entry in a central electronic register for following such courses in accordance with Article 25(5), and</p> <p>(b) uses the services of an independent advisor in accordance with Article 26(3).</p>	<p>1. A plant protection product authorised for professional use may only be purchased and used by a trained professional user who:</p> <p>(a) has been issued with a training certificate for following courses for professional users in accordance with Article 25, or has a proof of entry in a central electronic register for following such courses in accordance with Article 25(5), and</p> <p>(b) uses the services of an independent advisor in accordance with Article 26(3).</p>	<p>FI also points out that paragraph 1 does not contain a provision stating that only trained operators may PURCHASE plant protection products approved for professional use. This comes only in Article 24, paragraph 1. However, paragraph 2 of Article 17 regulates both the use AND purchase of more dangerous plant protection products. We propose that the Article apply to both the use and purchase of plant protection products approved for professional use.</p> <p>FI also proposes to introduce a definition of a trained professional user in Article 3 and use the shorter term in the article to make the text more clear.</p>
<p>2. More hazardous plant protection products may</p>	<p>2. More hazardous plant protection products may only be used and purchased by professional users.</p>	<p>FI does not see how paragraph 2 differs from paragraph 1 in any other way than that no training is required. As more hazardous plant protection products most probably will be deemed a plant protection product for professional use and thus be covered by paragraph 1, therefore we propose to delete paragraph 2 as redundant.</p>

<p>only be used and purchased by professional users.</p>		
<p>3. Application equipment in professional use may only be used by professional users that hold a training certificate issued to them for following courses for professional users in accordance with Article 25 or have a proof of entry in a central electronic register for following such courses in accordance with Article 25(5).</p>	<p>proposal: change form and move to new Article 28 a at the beginning of Chapter VIII</p> <p>Article 28 a General requirements for application equipment in professional use</p> <p>31. Application equipment in professional use may only be used by trained professional users that hold a training certificate issued to them for following courses for professional users in accordance with Article 25 or have a proof of entry in a central electronic register for following such courses in accordance with Article 25(5).</p>	<p>The entry in point 3 on a training certificate or evidence of registration is long and difficult to read. Also here the term “trained professional user” could be used (after a definition has been introduced in Article 3).</p> <p>FI proposes that the provisions in paragraph 3 - 5 on application equipment be moved to form a new article 28 a at the beginning of Chapter VIII for more clarity and consistency.</p>

<p>4. Within 3 years starting from date of first purchase, and every 3 years thereafter, a professional user shall submit his or her application equipment in professional use for inspection pursuant to Article 31. Where 3 years have passed from the date of first purchase of application equipment in professional use, a professional user may only use it for the application of plant protection products, if that equipment meets any of the following conditions:</p> <p>(a) the equipment has successfully passed inspection and the results have been recorded in the electronic register of application equipment in professional use in accordance with Article 31(6);</p>	<p>proposal: change form and move to new Article 28 a at the beginning of Chapter VIII</p> <p>Article 28 a General requirements for application equipment in professional use 42. Within 3 years starting from date of first purchase, and every 3 years thereafter, a professional user shall submit his or her application equipment in professional use for inspection pursuant to Article 31. Where 3 years have passed from the date of first purchase of application equipment in professional use, a professional user may only use it for the application of plant protection products, if that equipment meets any of the following conditions: (a) the equipment has successfully passed inspection and the results have been recorded in the electronic register of application equipment in professional use in accordance with Article 31(6); (b) a derogation under Article 32(1), or Article 32(3) applies to that equipment. At the time of submitting the equipment for</p>	<p>FI proposes that the provisions in paragraph 3 - 5 on application equipment be moved to form a new article 28 a at the beginning of Chapter VIII for more clarity and consistency.</p>
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	<p>inspection, the owner of the equipment or his or her representative shall provide to the competent authority or body carrying out the inspection, the information necessary for the competent authority to comply with its record-keeping obligations pursuant to Article 30(1), point (b).</p>	
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<p>(b) a derogation under Article 32(1), or Article 32(3) applies to that equipment.</p> <p>At the time of submitting the equipment for inspection, the owner of the equipment or his or her representative shall provide to the competent authority or body carrying out the inspection, the information necessary for the competent authority to comply with its record-keeping obligations pursuant to Article 30(1), point (b).</p>		
<p>5. A professional user shall inspect and operate application equipment in accordance with the manufacturer's manual of instructions.</p>	<p>53. A professional user shall inspect and operate application equipment in accordance with the manufacturer's manual of instructions.</p>	<p>See arguments above on moving paragraphs 3 - 5 to form new article at beginning of Chapter VIII above.</p>
<p>Article 3</p> <p>Definitions</p>		
<p><i>Relevant definitions</i></p> <p><i>Please comment on definitions linked to Article 15-17 and 20-23</i></p> <p><i>Please insert rows below for the relevant definitions you want to comment on, and indicate clearly in this</i></p>		

<i>column which definition you are commenting on</i>		
	<p>Proposals for a definition in Article 3 of the term “trained professional user”</p> <p>proposal 1: ‘trained professional user’: means a person who has passed the test/exam in Article xx showing he/she has acquired the knowledge and skills/proficiency needed to be able to use and handle plant protection products authorised for professional use</p> <p>proposal 2: ‘trained professional user’: means a person who has been issued with a training certificate for following courses for professional users in accordance with Article 25, or has a proof of entry in a central electronic register for following such courses in accordance with Article 25(5)</p>	<p>FI proposes that the different ways of showing that a professional user is trained could be moved to a definition in Article 3. Then a shorter term “<i>trained professional user</i>” could be used for the sake of clarity of the text, see proposal 2 on the left.</p> <p>The text in proposal 2 on the left does not, however, take into account the proposal to introduce a test or an exam as the means to show that a professional user has acquired the knowledge and skills/proficiency needed to be able/to be aloud to use and handle ppps for professional use. The proposal on an obligatory test/exam (preceded by voluntary training) would require another definition, see proposal 1 on the left</p>