



Council of the
European Union

Brussels, 24 March 2023
(OR. en)

7793/23

Interinstitutional File:
2022/0196(COD)

AGRI 161
PESTICIDE 17
SEMENCES 10
AGRILEG 53
ENV 301
PHYTOSAN 12
CODEC 465
INST 85
PARLNAT 53

COVER NOTE

From:	Oireachtas Joint Committee on Agriculture, Food and the Marine, Ireland
date of receipt:	22 March 2023
To:	The President of the Council of the European Union
Subject:	Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the sustainable use of plant protection products and amending Regulation (EU) 2021/2115 [10654/22 - COM(2022) 305] - Opinion on the application of the Principles of Subsidiarity and Proportionality

Delegations will find enclosed the opinion¹ of the The Oireachtas Joint Committee on Agriculture,
Food and the Marine on the above.

¹ The translation(s) of the opinion may be available on the Interparliamentary EU Information Exchange website (IPEX) at the following address: <https://secure.ipex.eu/IPEXL-WEB/document/COM-2022-305>



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Our Ref: AFM-i-057-2023

22 March 2023

For the attention of:
The Council of the European Union,
The European Commission, and
The European Parliament.

**RE: COM(2022)305 - Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE
COUNCIL on the sustainable use of plant protection products and amending Regulation (EU)
2021/2115**

The Oireachtas Joint Committee on Agriculture, Food and the Marine ("the Committee") has considered the above proposal, COM(2022)305, concerning the sustainable use of plant protection products. The Committee agreed to forward the attached political contribution for consideration to the Council of the European Union, the European Commission and the European Parliament as part of the political dialogue process with national parliaments.

Yours sincerely,

Jackie Cahill, T.D.
Cathaoirleach

Cuireann Seirbhís Thithe an Oireachtas fáilte roimh chomhfhreagras I nGaelige



An Comhchoiste um Thalmhaíocht, Bia agus Muir

Cion Polaitiúil maidir le

RIALACHÁN Ó PHARLAIMINT NA hEORPA AGUS ÓN gCOMHAIRLE maidir le
húsáid inbhuanaithe táirgí cosanta plandaí agus lena leasaítear Rialachán (AE)
2021/2115

March 2023

Joint Committee on Agriculture, Food and the Marine

Political Contribution on

Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE
COUNCIL on the sustainable use of plant protection products and amending
Regulation (EU) 2021/2115

Márta 2023

33/AM/017

1. Introduction

The Oireachtas Joint Committee on Agriculture, Food and the Marine ("the Committee") considers *Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the sustainable use of plant protection products and amending Regulation (EU) 2021/2115* to be significantly important to Ireland and the EU.

2. Scrutiny by the Committee

The Committee first considered the proposal at a private meeting on 2 November 2022. Following this meeting, the Committee agreed to invite Officials from Ireland's Department of Agriculture, Food and the Marine (DAFM) to brief the Committee further on this proposal. This meeting was held on 23 November 2022 and a transcript of the meeting can be found [here](#). Having considered its discussion with Officials from DAFM, the Committee considered the proposal again at a private meeting on 16 January 2023. It was agreed by the Committee at this meeting to write a Political Contribution on this proposal.

3. Decision of the Committee

On 21 March 2023 the Committee agreed to forward a copy of this Political Contribution to Charlie McConalogue T.D., Minister for Agriculture, Food and the Marine, Ursula von der Leyen, President of the European Commission, Roberta Metsola MEP, President of the European Parliament, and Charles Michel, President of the European Council.

The Committee further agreed that, in the interests of inter-parliamentary cooperation on EU matters, a copy of this report be forwarded to the appropriate Committee in the National Parliament of each EU Member State and to Ireland's MEPs.

4. Opinion of the Committee

The Committee agrees with the goal of the proposal of achieving a safe and affordable production of food in line with sustainability principles and safeguarding eco-systems, however food security of the European Union and the viability of income of farmers must also be guaranteed.

Having considered the proposal in detail, the Committee makes the following observations:

- Articles 4 & 5 relate to that target of 50% reduction in the use and risk of chemical plant protection products by 2030. The Committee is concerned without a detailed impact assessment Member States are starting from different positions and flexibility in setting national targets is required to accommodate the individual circumstances of Member States.
- The Committee notes that Article 15 will require Member States to set detailed crop-specific rules. The Committee is concerned that the level of detail for crop-specific rules that are required to be legislated for at national level and updated as it arises may have a large administrative burden on Member States and may go beyond what is required to achieve this proposal's goal.

- The proposal states that placing biological plant protection products on the market will give farmers more alternative options for sustainable crop protection. In particular Article 15.6(c) references low-risk plant protection products or alternatives to chemical plant protection products which are effective against the harmful organisms to provide farmers with tools to substitute chemical plant protection products. The Committee supports research and development of alternative substances, and it is their view that they should be quickly and widely available to aid Member States to reach their 2030 target.
- The Committee believes that the definition of 'sensitive area' provided under Article 3 (16) of the proposal is too broad as it covers Natura 2000 sites and designated areas. The Committee is concerned of the use of this definition within Article 18 of the proposal which details the use of plant protection products in sensitive areas. In its current form the proposal may have a negative implication on Ireland as it may cover a significant amount of farmland which would fall under Natura 2000 sites and designated areas. The Committee is concerned that under this definition the provision of use of pesticides would no longer be permitted in Natura 2000 sites and designated areas which are currently used for agricultural activities such as livestock grazing.

It is the opinion of the Committee that the current form of the proposal will have negative implications for both Ireland and other Member States. The Committee requests that the definition of 'sensitive area' is reconsidered to take into account Natura 2000 sites and designated areas which are used for agricultural use and may require the provision of use of pesticides. The Committee also believes that as CAP 2023 -2027 has commenced and Members States CAP Strategic Plans have been approved without this proposal being taken into account, additional EU funding should be provided to compensate farmers to the cover costs that will arise from the requirements of this proposal. The Committee requests a response on the above concerns raised by 16 May 2023.