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**NOTE**

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From: General Secretariat of the Council  
To: Delegations

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Subject: AOB item for the meeting of the "Agriculture and Fisheries" Council of  
27 April 2026:  
Record-keeping requirements for use of plant protection products  
*- Information from Germany, supported by Austria, Belgium, Czechia,  
Finland, Italy, Latvia, Lithuania, Luxembourg, Poland and Portugal*

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With Implementing Regulation (EU) 2023/564, the EU Commission has further specified what information on the use of plant protection products is to be documented under Article 67 of Regulation (EC) 1107/2009. Since 1 January 2026, users of plant protection products have been required to record additional details, including in particular the approval number of the plant protection product, the EPPO code and the BBCH stage of the crop.

We fundamentally welcome the EU Commission's efforts to harmonise the application data recorded by the Member States more closely. The requirement for standard measuring units when specifying the quantity of plant protection product used appears meaningful. At the same time, we cannot readily understand what benefit the EU Commission stands to gain from the recording of further details, such as approval number, EPPO code and BBCH stage, as is now required. According to the assessment of the competent authorities, these details are not necessary for the purposes of controls under specialised law.

Furthermore, these requirements subject users of plant protection products to a significant additional bureaucratic burden as, in contrast to the information required previously under Article 67 of Regulation (EC) 1107/2009, users do not already have the information now required and instead need to research this information in each case. This represents a considerable burden, particularly for special crop farms, such as vegetable farms or tree nurseries, which cultivate and treat many different crops at the same time.

In view of this, we believe we need an in-depth discussion to simplify the recording requirements introduced with Implementing Regulation 2023/564 and to ensure their proportionality. This should also be fed into the EU Commission's further deliberations on simplifications regarding statistics for agricultural enterprises.

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