

# *Open space in SUD after SUR withdrawal*



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# Scope of SUD/SUR

**SUD**



**SUR**

**Pesticides which are PPPs (possible extension for biocides)**

**Framework Directive**

- **more flexibility to MS**
- **already implemented in MS in particular way**

**PPPs**

**Directly applicable in all MS  
higher level of harmonisation  
- is this harmonisation really possible?**

- **different agro-climatic conditions**
- **different level of PPPs use**
- **different starting points and implementation of SUD**

# ***SUR vs SUD***

***SUR with a certain degree of modification preserves some elements of the SUD e.g. professional training in the field of plant protection products, IPM, aerial applications, sale and distribution of PPPs, their storage, handling, disposal of packaging and remnants***

***New obligations were proposed for professional users, such as the obligation***

- ✓ ***to use advisory service and keep records of them,***
- ✓ ***to keep records of the application of IPM principles,***
- ✓ ***to keep records of purchased and used application equipment and their controls.***

***New obligations were proposed for Member States (state administration bodies), Member States would have to monitor:***

- ✓ ***creation and use of independent advisory services,***
- ✓ ***implementation of IPM rules at the level of agricultural holdings through the electronic register of IPM and the use of plant protection products,***
- ✓ ***control of application equipment for professional use through special registers,***
- ✓ ***practical training of professional users, distributors and consultants,***
- ✓ ***use of plant protection products through an electronic register***

## ***SUR vs SUD***

***The SUR proposal has been withdrawn,  
and the questions remains***

***? whether a new regulation proposal is  
necessary to meet the main goals of the  
SUR***

***? what scope for flexibility the current  
SUD provides and how the SUD would be  
modified (amended) (possible  
amendments of annexes?)***

# Definitivos

**SUD**



**SUR**

- Professional user
- Distributor
- Advisor
- Application equipment
- Aerial application
- Integrated protection against harmful organisms
- Risk indicators
- Non-chemical methods

- Chemical PPP
- Chemical active substance
- Application equipment for professional use
- An unmanned aircraft**
- Sensitive areas
- Biological control**
  
- + links to relevant definitions in other legal regulations

# *Reductions targets*



# Reduction targets

*46 substances are authorized in the Slovak Republic from the risk substances that are so-called candidates for substitution according to Article 24 of Regulation (EC) No. 1107/2009), and these are mainly substances that meet at least two criteria of PBT properties, or they have very low toxicological reference values.*

*Their annual use represents approximately 18-20% of the total use of active substances in the Slovak Republic.*

*Therefore, one of the ways to achieve the goals of the Green Deal and the "Farm to Fork" strategy is to find alternatives to the CfS and promote their use in practice.*

*close link to Regulation 1107/2009*



# Annual use of a.s. in Slovakia

The percentage of sales of plant protection products (in a.s.) in individual groups







# National reduction targets

*Average value of use and risk of chemical pesticides/ha of usable agricultural land (UAA)*

<i>EÚ</i>	<i>28,05</i>
<i>SR</i>	<i>11,98</i>

*From the above, it is clear that SR already reaches a value of 43% of the average value at the EU level in the reference period*

***how to reduce further???***

- *Similarly, the use of more dangerous pesticides in expression kg/ha UAA*
- *EÚ*                      *0,41*
- *SR*                        *0,24*
  
- *which represents 59% of the EU average.*
  
- ***the reduction in is in the NAP***
- ***(15% by 2025 - compared to 2020)***

# Overview of sales of PPPs in EU

Country	2018 sales (t)	% EU sales 2018	2019 sales (t)	% EU sales 2019
France	83983.1	23.7	54303.7	16.3
Spain	61343.2	17.3	75190.4	22.6
Italy	54038.5	15.2	48405.3	14.5
Germany	44953.8	12.7	45176.0	13.5
Poland	23156.6	6.5	24253.2	7.3
Romania	11107.6	3.1	9046.7	2.7
Netherlands	9387.1	2.6	9261.4	2.8
Hungary	8535.1	2.4	7815.0	2.3
Portugal	8057.3	2.3	9865.8	3.0
Belgium	6635.2	1.9	6126.5	1.8
Czech Rep	5178.1	1.5	5052.8	1.5
Austria	5279.5	1.5	4954.5	1.5
Greece	4860.5	1.4	4867.5	1.5
Finland	4901.6	1.4	4034.2	1.2
Bulgaria	5044.1	1.4	6660.0	2.0
Denmark	2646.1	0.7	2660.9	0.8
Slovakia	<b>2490.2</b>	<b>0.7</b>	<b>2352.2</b>	<b>0.7</b>
Ireland	2651.4	0.7	2971.8	0.9
Lithuania	2048.6	0.6	2317.6	0.7
Sweden	1870.7	0.5	1800.9	0.5
Croatia	1697.7	0.5	1563.8	0.5
Latvia	1587.0	0.4	1650.6	0.5
Slovenia	1171.3	0.3	973.2	0.3
Cyprus	1183.6	0.3	1230.8	0.4
Estonia	636.1	0.2	745.2	0.2
Luxembourg	63.0	0.0	56.8	0.0
Malta	00.0	0.0	75.6	0.0

# Reduction targets

???

## **Target 1**

*Exclusion of the most risky active pesticide substances will subsequently increase the use of less or low-risk active substances, which, due to their lower effectiveness, will require higher application doses and/or a higher number of applications → the total use of PPPs will rise (we have already been following this trend in recent years)*

## **Target 2**

*Reduction of CFS use is one of NAP quantitative targets*

# *Interventions of SP 2023 - 2027*

*Interventions of the Strategic Plan, e.g.:*

*70.4 Organic farming*

*70.6 AEKO – Thrifty management of arable land, orchards and vineyards*

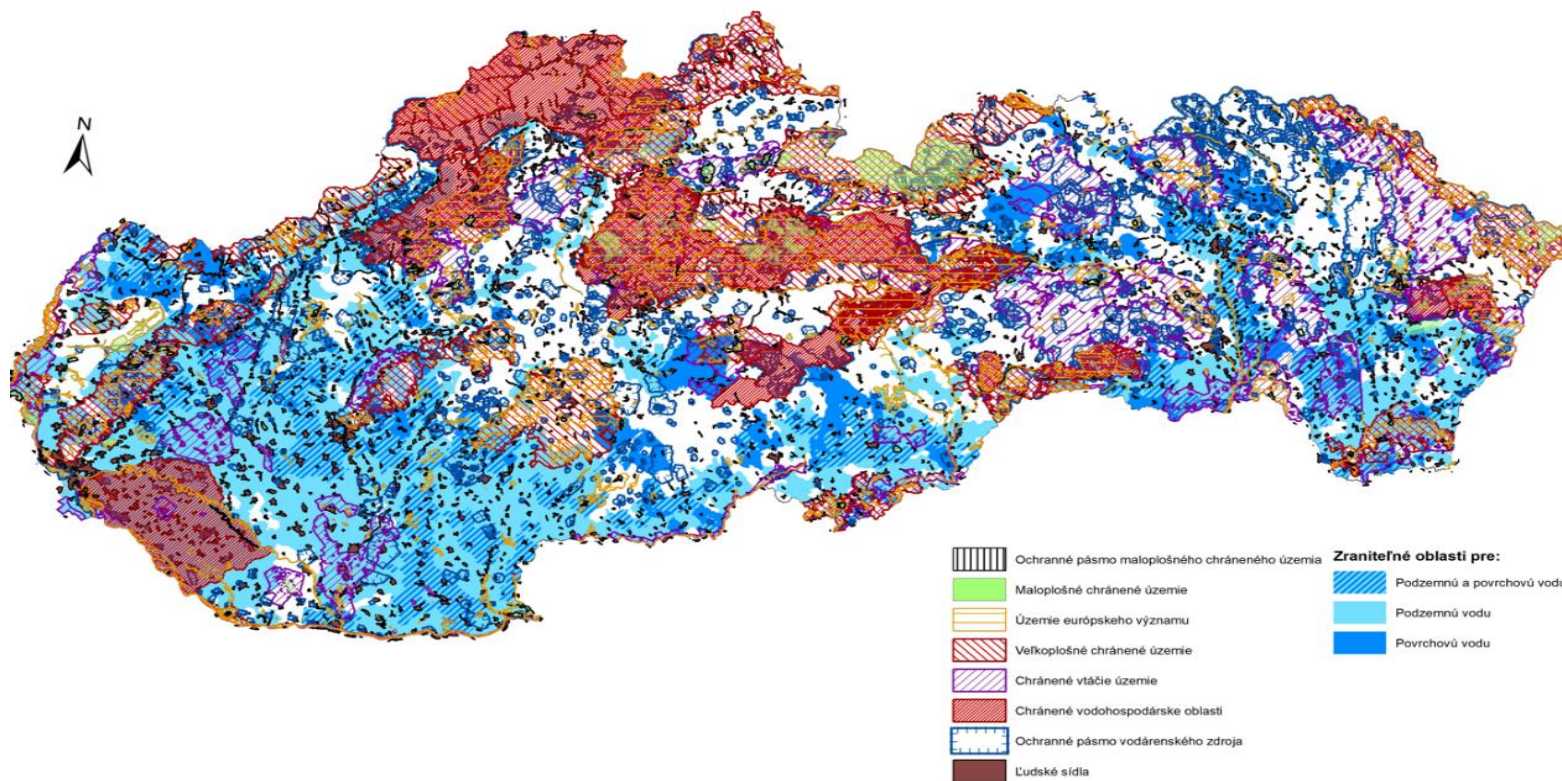
*31.1 Whole-farm eco-scheme (Non-productive elements and areas)*

*31.1 Whole-farm eco-scheme (Inter-row weeding)*

# Sensitive areas

<b>Citlivé oblasti</b>	<b>Plocha km2</b>	<b>SR km2</b>	<b>%</b>
Chránené vodohospodárske oblasti	6846	49036	13,96
Ochranné pásmo vodárenského zdroja	7119	49036	14,52
Zraniteľné oblasti	21561	49036	43,97
<b><i>CHVO + OP+ zraniteľné oblasti</i></b>	<b>30632</b>	<b>49036</b>	<b>62,47</b>
Ochranné pásmo maloplošného chráne	201	49036	0,41
Maloplošné chránené územie	1327	49036	2,71
Územie európskeho významu	6255	49036	12,76
Veľkoplošné chránené územie	11052	49036	22,54
Chránené vtáčie územie	13100	49036	26,71
<b><i>OP_MCHU+MCHU+UEV+VCHU+CHVU</i></b>	<b>18400</b>	<b>49036</b>	<b>37,52</b>
<b>i+ii</b>	<b>38653</b>	<b>49036</b>	<b>78,83</b>
Ľudské sídla	2576	49036	5,25
<b>i+ii+c</b>	<b>39425</b>	<b>49036</b>	<b>80,40</b>

# Sensitive areas





## *Sensitive areas*

*In the Slovak Republic, there are defined areas with restrictions on the use of certain PPPs based on their risk to the subject of protection (birds, aquatic organisms, water resources) - link to risk assessment outcomes according to Regulation 1107/2009*



# *Other areas of SUR*

## ***NAP***

***No need for change of SUD (possible guideline for NAP format)***

## ***IPM***

- ***Crop-specific guidelines, legally binding***
- ***Annual update***
- ***Keeping records of compliance with IPM principles***
- ***Monitoring pests***
- ***Pest threshold values, list of non-chemical alternatives***
- ***Still possible under SUD but pragmatic approach***

# *Other areas of SUR*

## *Use, storage, disposal of PPPs*

*General requirements  
Use of PPPs in sensitive areas  
(exceptions for 60 days)  
Aerial applications (drones!)  
Advisory service – mandatory*

***DRONES – technical specification  
Authorisations of PPPs for drones  
application – requirements and  
assessment approach under  
1107/2009!!!***

## *Sale of PPPs*

*Similar to SUD*

# *Other areas of SUR*

## *Professional training, information and awareness raising*

*Practical part of the training  
Independent advisory system  
Information on acute and chronic poisoning*

*Still possible under SUD*

## *Application equipment*

- *Electronic register with detailed data on AE*
- *Technical inspections on a three-year basis (new equipment?)*

*Still possible under SUD*

# *Other areas of SUR*

*Methodology for  
calculating reduction  
targets and  
harmonized risk  
indicators 1, 2, 2a*

*???*

*Administrative  
and financial  
provisions*

*Not relevant*

# Conclusion

- *the framework SUD still provides possibilities for better implementation even in the context of some provisions of the SUR proposal*
- *close inter -connection to Regulation 1107/2009 (acceleration of approval and authorization processes, availability of alternatives) and SAIO Regulation*
- *more attention should be paid to drones and the necessary technical specifications, establishing requirements for risk assessment of such application, requirements for PPPs and their risk assessment for drone application under Regulation 1107/2009.*

*Thank you for your  
attention 😊*



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