Review of the Pesticide regulatory process – State of the play

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European pesticide legislations

- Plant Protection Products (PPPs) Regulation 1107/2009
  - Priority must be given to human health, animal health and the environment
  - High level of protection
  - Underpinned by the precautionary principle

European pesticide legislations

- Plant Protection Products (PPPs) Regulation 1107/2009
- Maximum Residue Limit (MRL) regulation 396/2005
  - Priority must be given to human health and animal health
  - Combined exposure shall be assessed

European pesticide legislations

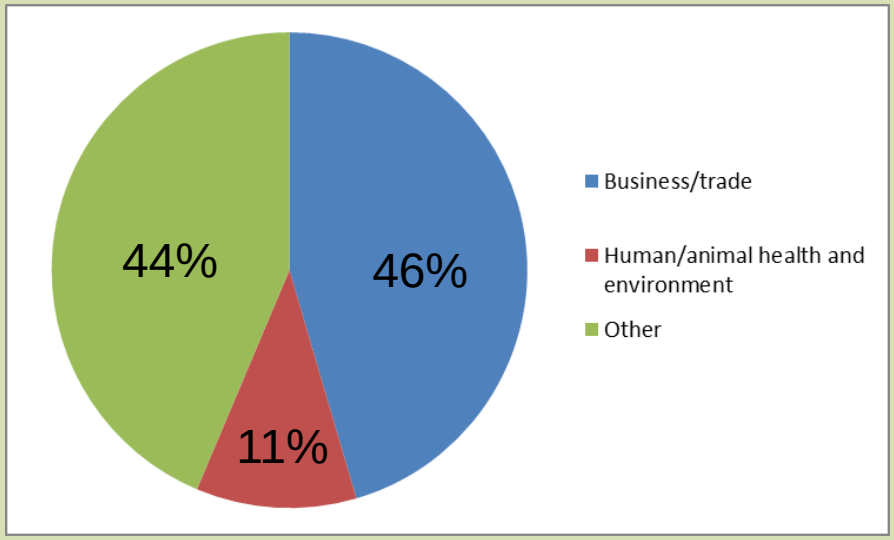
- Plant Protection Products (PPPs) Regulation 1107/2009
- Maximum Residue Limit (MRL) regulation 396/2005
- Sustainable Use of Pesticides Directive (SUPD) 129/2008
  - Integrated Pest Management mandatory since 2014
  - Pesticides shall be used as a last resort
  - Member States shall provide information on alternatives to pesticides to farmers
  - Use of pesticides in sensitive areas (schools, hospitals…) must be avoided

Pesticide legislation reviews

- REFIT of PPPs and MRL regulations (DG Sante, consultant)
- Evaluation by the European Parliament Research Service on the implementation of the PPP regulation
- Evaluation of the implementation of the PPP regulation by the Committee on the environment, public health and food safety from the European Parliament
- Evaluation of the authorisation process for pesticides in the EU by the Scientific Advice Mechanism (SAM) from the European Commission

Pesticide legislation reviews: REFIT

- Fitness check: only pesticide regulation (1107/2009) and MRL regulation (396/2005)
- NOT Sustainable use of pesticides directive (128/2009)
- ToR and 53 questions and sub-questions biased towards business/trade usefulness of the regulations rather than health and the environment.



Pesticide legislation reviews: REFIT

- Compilation of opinions, focus on administrative and financial burden

- No investigation on the proper implementation of the regulations

  E.g. Public consultation: 91% of responses: Use of pesticides does not minimise the impact on the environment.

Pesticide legislation reviews: ENVI committee (European Parliament)

- Main findings (PPPs regulation 1107/2009)
  - Increase in number of derogations without a proper justification
  - Cut-off criteria are not correctly applied
  - Integrated Pest Management and low-risk substances not sufficiently promoted
  - Regulation not in line with other policies: agriculture, food security, climate change, sustainable use of pesticides, maximum residue levels
- Efforts needed at EU and Member States levels to correctly implement the regulation

Pesticide legislation review: European Parliament Research Service

- European Implementation Assessment of PPPs regulation 1107/2009
- 4 studies carried out by consultants
- IPM not addressed by regulation
- Production of scientific evidence by the pesticide industry
- Competent authorities are understaffed and the quality of their work is highly variable
- Misuse of emergency authorisations (article 53)
- Lack of transparency

Pesticide legislation review: Scientific Advice Mechanism (SAM)

- EU dual system evaluation
- Biased initial postulate: pesticides necessary for agricultural production
- Importance to launch public debate on the form of agriculture we want
- Any pesticide can have a negative impact on human health
- Active substances and formulations should be all assessed by a single European agency
- Post-market vigilance
- Registration of regulatory studies
- Comparative assessment

Pesticide legislation review: What do experts think?

- Current evaluations are often incomplete, lack of solutions
- Citizens for science in pesticide regulation
- ~20 experts: Reform of pesticide risk assessment document
- Regulatory tests should be carried out by and independent EU agency and the results publicly available

Pesticide legislation review: What do experts think?

- Review the conflict of interest policy at EU and MSs level
- Review conflicts of interest policy in designing test methodologies / review test methodologies
- EFSA should rely on real, actively publishing experts with a correct compensation
- Ensure a correct use of non-industry studies

Thank you!