

**Informal Expert Group meeting on
Directive 128/2009 (SUD):**

Brussels, 14th June 2010

**OPERA's REFLECTIONS
ON THE OUTCOME OF THE INFORMAL
EXPERT GROUP ON SUD**

OPERA



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The OPERA meeting Informal Expert Group on SUD took place in Brussels on 14th June. More than 60 representatives from State Ministries, Universities, Associations, and Companies, NGOs gave their precious contribution to the knowledge exchange and debate.

The different contributions presented the state of play on transposition of The Sustainable Use Directive in different countries and provided details from multiple points of view and interests on the approach that should be taken. The debate stimulated comparison of experiences, know-how, innovative and alternative solutions applied in various countries. The meeting also laid a solid basis for further discussions and debates on the SUD implementation on which OPERA will undertake the task to further investigate and develop.

Introduction

Professor **Ettore Capri**, OPERA Director, after having introduced, with a brief description, the Research Centre and its

modus operandi, focused his attention on the importance in achieving integrated solutions regarding the implementation of the Sustainable Use Directive.

He pointed out that in order to extract value from the SUD implementation for the society as a whole, the main objectives should focus around reduction of risks and preservation of natural resources, integration of all available tools, professional education and information, and the measurement of the performance.

The transposition of the Directive in the MS legislation has to take account the increasing attention paid towards environment and food safety alongside with the due consideration for the difficult economic situation. Furthermore, each Action Plan must consider the complex legislative framework and promote a balanced set of measures to achieve risk reduction. Agricultural activity is strictly wired to natural resources and environment; this is the reason why land managers need to find sustainable use of water, energy and soil to maintain their availability in the future.

This holistic approach should be applied also to rural development where pure agriculture activity, tourism, infrastructures and recreation are all part of an equilibrated living system. To reach this balance, or in other terms a multifunctional approach, the respective representatives of these contrasting interests must find a synergistic compromise.

The opening speech given by the **Secretary General of COPA-COGECA, Pekka Pesonen** was calling for pragmatism and coherence in the SUD implementation as seen from the consumer and a farmer's perspective.

He pointed out that, these two protagonists, the farmer and the consumer, stand respectively at the beginning and at the end of the chain of production but it often happens that the information is not penetrating from one to another. Growers make great efforts supporting increasing costs deriving from economic instability, stricter quality standards and more aggressive import competition. At the end farming remains a business and consumers should acknowledge these efforts through a fair price paid on the market. This dimension will contribute to economic sustainability, which together with social and environmental ones ensures a stable and sound growth for the sector.

Public information campaigns to improve communication should underline not only health and environmental aspects but also the flip side of the coin about the means necessary to produce at high standards and the benefits that PPP use brings to society in terms of food security and land management.

In order to create an optimum climate for the successful implementation of requirements related to the sustainable use of pesticides, we have to ensure that third country trading partners acting on the

internal market respect the same level of standards.

The contribution agriculture brings to combat climate change is crucial, but the adaptation of agriculture to the new climatic conditions is equally important. Farmers need to have available suitable tools to control new emerging pests and invasive species.

In implementing the SUD, Member States have to present at EU level their National Plans and must find a balance between economical, social and environmental aspects. To achieve this, they need to be able to compare and share their experiences and knowledge in order to base their decisions on scientific data and practical solutions.

The Secretary General pointed out that at national and regional level, the emphasis should be on risk reduction and not on the amount of pesticide used for application. Moreover, the application of IPM should be stimulated in the direction of integrated use of PPP and non-chemical tools according to plant protection needs.

The latest report of EFSA concludes that 96% of food products have the residues under the established threshold. This confirms that good practices are in place and are respected.

The National Action Plans must provide the opportunity for European farmers, as primary actors, and as well for the industry to continue having inputs for their activity, express their opinion and put forward their expertise regarding the choice of tools to adopt.

The transposition of SUD into the national legislation. Process and difficulties

Portugal, Germany and Sweden representatives presented their experience in the transposition process of the SUD either for directly implementing the provisions or for updating the existing legislation.

In Portugal –likewise many other MSs– some of the SUD provisions were already part of the national legislation, and the transposition process had been completed through the introduction of some decree laws mounting up to a combination of 6 different pieces of legislation.

The legislation now provides for sales, distribution, application, handling and storage including the licensing of sale points for professional users, the certification of distributors, professional users and technicians; requirements for handling and storage of PPP's; diluting mixing and cleaning of pesticides and of the application equipment after use.

Also legislation is in place for IPM, Integrate Production and Organic Farming describing the principles, the guidelines and the respective control measures. Aerial spraying legislation will include the prohibition as well as criteria for exceptional applications. Awaiting its publication is the legislation on Inspection of Pesticide Application Equipment in Use.

Still under elaboration is the legislation related to reduction of pesticide risks related to the applications in specific areas and measures to protect the aquatic environment and drinking water.

Since the process of putting in place the necessary provisions was mainly directed to the update of the existing legislation, the consultation of stakeholders in this process

has played a secondary role, limited to the national legislative procedures.

In a different note, Germany gave importance to the participation of stakeholders in drafting the legislative proposals. Several working groups, meetings and workshops were organized to achieve this result.

Furthermore their approach is a general one not product specific for risk reduction. Implementation of mitigation measures is considered a easier way for achieving risk reduction through: establishment of permanent structures/ habitats in landscape like hedgerows to increase resilience and protect biodiversity, management of “hot spots” like water bodies located in areas with intensive PPP use, increasing awareness of risks and acceptance for mitigation measures and voluntary initiative. They also consider monitoring and risk indicators to check the effectiveness of risk mitigation.

Special attention was given to the development of risk indicators, acknowledging their crucial role in measuring the success of generic mitigation measures. The development of indicators has stumbled on the problem related to the lack of available data.

In Germany the principles setting the basis for discussions on the future legislation include: the need for overall risk reduction; definition of IPM rules; improvement of handling and storage conditions for pesticides; better education and training for users and better risk communication to the general public.

In Sweden, three authorities have been involved in drafting the transposition instruments for SUD (Swedish Board of Agriculture, the Swedish Chemicals Agency, Swedish Environmental Protection Agency) .The transposition was envisaged as an addition to the environmental legislation.

Difficulties were encountered especially in adapting the current legislation, the increasing administrative costs related to

implementation and the lack of information and knowledge (especially regarding the implementation of IPM).

Concerns were raised by participants in the conference about the need to evaluate the economic impact of the measures proposed in the legislations which transposes the SUD. It emerged that there is a need for systematic evaluation of the administrative costs for the government and for the businesses.

The process of constructing the national framework for transposition needs to be involve on a large scale all the actors, to achieve a successful implementation and to ensure that stakeholders support in practice the solutions proposed.

The national legal framework needs to include in a balanced manner compulsory requirements for the sustainable use of pesticides and supporting measures to compensate for loss of income and/or productivity.

The point of departure in the process needs to be a thorough analysis of the situation and identification of the issues where most of the risk reduction can be achieved with as little as possible negative economic and social impact.

Any solution for transposition needs to take into account the latest technical solutions available to reduce risks and to provide incentives for the development and implementation of new ones.

The development of National Action Plans in the member states: status

Countries as the Netherlands and Denmark have a history with national action plans and their aim mainly was to reduce the dependency from chemical plant protection products and their effects on the environmental compartment.

For the future plan it is envisaged to continue in this direction but focus more on reducing the risk exposure of both professional users and bystanders. This is the reason why strict rules on application in particular zones like public gardens, streets and railways would be further foreseen. In the context of the new directive, the NAPs in these countries will focus more on providing the necessary education and training to users.

It was again stressed that in order to evaluate efforts done in the past and those employed in the next years, it is fundamentally important to develop new sensitive and objective indicators.

Regarding Ireland's situation, they have started to conceive the NAP from the conclusions of the recent measurements and monitoring results showing no significant problems detected in relation with the presence of pesticides residues in food and water bodies.

The Irish action plan will reflect the principle of risk reduction. The focus is on a pragmatic implementation of clear measures for training and certification; inspection of application equipment; provisions on handling and storage of pesticides and IPM.

Participants have raised concerns on the recognition of certificates granted by different countries in the case of movement of workers. Also defining appropriate training programs for the different categories of certificates is an issue. The difficulties arise from the different nature of the information that has to be passed on

to the distributor, advisors or farmers. It emerged that a solution has to be found to promote mutual recognition of the qualifications and certification for the foreign workers. A common framework or guideline at EU level was suggested as the solution.

The development of NAP across EU needs a good deal of guidance. Despite of the specificities of each MS that have to be taken into account, common elements to be included have to be approached in a coordinated manner.

NAPs should include instruments for promoting the implementation of good agricultural and environmental practices.

In order to ensure a continuous adaptation of NAPs to the priorities emerging from the real situation of the ground it is useful to ensure that procedures for ex-ante and ex-post thorough evaluations are in place.

NAP's should focus on implementing scientifically based solutions to achieve a direct risk reduction.

It should to be evaluated if certain solutions or measures do not have indirect consequences like: increase in imports of commodities produced with little concern on food safety aspects; increased use of illegal pesticides; negative impact on environment through larger areas brought into agricultural production; etc.

NAPs should include a series of measures to communicate to the general public the results and the positive impacts in risk reduction achieved through the envisaged measures. Such information campaigns would increase the confidence of consumers in European food production with positive consequences on market developments.

The process of public consultation of national stakeholder's

Several instruments have been used to give farmers, farmer associations, NGOs and suppliers the opportunity to comment and participate in designing the proposal such as informal and formal meetings and internet forums.

In France the consultation process for the NAP, "Ecophyto2018" started in 2007 with the definition of the objectives. This was the result of a debate conducted in several thematic groups gathering the relevant stakeholders and a wide public

consultation taking place at local level. Inter-regional meetings have gathered a total of 15.000 participants and the on-line consultation received a similar number of contributions.

From January 2008 to April 2009, the NAP has been developed based on the feedback from stakeholders.

The main actions in the final form of the plan comprise of: diffusing good practices and innovative farming systems; promoting research and experimentation; training of users, sellers, advisors; developing systems to monitor harmful organisms.

For the proper implementation of this plan, France felt necessary to establish a layer of local governance (Local Committee for orientation and follow-up supported by technical groups) to take into account regional specificities.

In the UK, the preferred solution involved a series of informal meetings with the key stakeholders followed by a formal public consultation. The public 12 week consultation gathered contributions from 900 organizations having different interests in the implementation of the directive.

The final product put forward by the national authorities evaluates the impact of implementation for different provisions in three different scenarios which in principle include: status-quo; enhanced voluntary initiatives and further regulation to establish compulsory measures.

It is perceived that whatever solutions will be retained, the principles to be followed are that the measures have to be effective and proportional and that the impact of the economic crisis is an important factor.

The consultation process seemed extremely important for all participants. It is considered to give the opportunity to different stakeholders to express their views and it creates the stage for taking-up the best solutions available from the technical and the political.

It is important to ensure multiple means of participation of stakeholders in the process (conferences, seminars, working groups, internet) in order to obtain a meaningful contribution and participation.

A compulsory part of setting the scene for consultation is to provide the society with a clear image of the existing measures in place to ensure food and environmental safety.

Implementation of the provisions of the SUD

Several concrete multifunctional projects have been presented; some aiming to preserve biodiversity (margins) others preventing PPP losses to water and soil (buffer strips, bio-beds).

All these meaningful practical solutions depend on specific factors and cannot provide a unique effective solution for all situations. However, promoting some of these available solutions, one can reduce significantly the risks for human health and environment with relatively low investments from the farmer. Their applicability has to be judged considering topography, soil characteristics,

environment and climate to ensure the best efficiency possible.

Integrated Pest Management

The Portugal experience of IPM starts in 1994 and it involves about 300.000 ha of its agricultural land used for cultivation of diversified crops. The government, through the DGADR (Biological evaluation and plant health division) provides several tools that are compulsory for farmers who want to be involved in IPM:

- IP guidelines,
- Training programmes for IPM and IP,
- technical guidelines and lists of PPP permitted,
- farm logbooks.

The training course is compulsory for farmers and technicians and is structured in three parts (Basic concepts, IPM and Nutrition). The farm logbook is a document that includes information about the farms performances (eg. PPP applied; irrigations; pests disease and weeds monitoring; nutrition). Through these guidelines the farmers can benefit from a product certifications (IPM label and IP label) and as a consequence is subject to a monitoring by DGADR

However, the requirements for an IPM production standard will have to be reviewed once the new approval criteria for active substances will be applied, as the most problematic compounds will be removed. The Portuguese IPM approach will change dramatically in 2013 as the experiences has showed that the ban of certain compounds is not necessarily helping improving the risk profile of local agriculture.

The Italian experience in IPM started early in 1996 in Region Emilia Romagna, it involves a large areas and in some cases represents now a prerequisite for some large scale retail trade.

Implementation of IPM in the context of SUD has been included in the Italian NAP in two levels: compulsory IPM level and voluntary IPM level. In the first level (basic) the measures involve provision of manuals on IPM, weeds managements and the improving of advisory services

(meteorological services, forecasting services for the most important pests, monitoring pest services, coordination of the warning activities, farm information planning).The second part (advanced) consists in defining voluntary IPM strategies at national and regional level regulating the use of PPP based of technical guidelines.

While Italy has good experience in voluntary IPM, it is difficult to define the compulsory IPM level.

However, it emerged that for IPM it is useful to develop forecast models and monitoring systems for disease and pests. The use of meteorological stations together with the advice of research centres or professionals can provide good results in coordinating the pest treatments according with the existing pest risk in the area. Information technology solutions can contribute also to enable farmers to spray chemicals or apply integrated management only when it is really necessary and at the most efficient timing.

The implementation of IPM needs to benefit from a complex set of financial, technical and communication support system. Farmers need to acknowledge all the pest control measures available, their efficiency and understand how these can be integrated to fit their production needs. Financial support is crucial to ensure initial investments and compensate for the uptake of good practice.

IPM is still seen as a niche standard of production and not as an integrated solution applicable to all agricultural production activities. Application of IPM horizontally to all producers will neutralise farmer's market advantage given by a niche standard, meaning that excessively strict conditions of production and supplementary costs for certification and additional production costs will not be compensated by the price for the final product. Such application of IPM would further reduce competitiveness. Constant monitoring and restrictive lists of products can not find their place when this type of production will become mandatory for all producers.

The concept of IPM needs further development as to ensure that the principles for IPM will provide with effective solutions for pest control. The efficiency of such methods of production has to be judged against the available solutions in terms of efficiency, costs and overall impact on food production.

There is need to envisage a gradual implementation of such systems to allow that pest control techniques and services (either public or private) are in place for the farmers to use.

Again a combination of mandatory requirements and incentives seems to be the most pragmatic avenue for the implementation of IPM.

Field margins

The implementation of this land management practice has emerged as having multiple functions and benefits starting with soil particle retention, maintaining productivity, reducing riverbank erosion, water protection, and biodiversity and pollination enhancement.

As pointed out by technical presentations there are certain parameters that have to be established to ensure their efficacy, like infiltration capacity; flow concentration; positioning and sizing. A technical tool box to establish buffer zones could be the solution to take into account all local specific elements.

It is feasible and practical to balance biodiversity conservation and protect resources on the farm, alongside competitive farming practices. Today, it is

widely acknowledged that field margins are crucial for the protection of soil and water and, where appropriately managed, to boost biological diversity in farming landscapes. Furthermore, by strategically locating field margins on areas of the farm where they will provide maximum protection of watercourses and the greatest benefit to biodiversity, a high level of environmental gain can be achieved with minimal impact, if any, on farm income.

Implementation of this measure is also considered particularly important by the water industries. It has emerged that the implementation needs to take into account and coordinate with other legal requirements to establish such buffer zones. Their position and width has to be judged depending on the local conditions, but there is a need to identify appropriate instruments to financially support their implementation.

Field margins management needs to be promoted as a solution to comply with multiple legal requirements (see OPERA publication "Multifunctional Landscapes").

The efficiency of such a solution to protect the environment and human health is dependant on multiple factors, the emphasis should be on the capacity of the field margin to retain substances and soil particles and not necessarily on the sizing.

It is also important to incorporate technology (including for example satellite imagery) as to provide the right tool to evaluate the best possible position of the field margin to ensure efficiency.

Application technology

The European TOPPS project highlighted that it is crucial to ensure that application machinery are in line with the standards in order to ensure significant risk reduction. The newest improvements in application technology like nozzles and rinsing tanks need to be financially supported and promoted as good practice.

It has been identified that the following measures can significantly mitigate the risk related to pesticide application:

- presence of rinse water tanks;
- internal and external cleaning devices;
- better measurement of water volumes;
- filling and container cleaning devices;
- sprayer design for lowest residual volume.

More precise application technology reduces significantly the risks for the operator, bystander, environment and saves costs for the farmer without negatively affecting the productivity.

Incentives should be put in place to support the investment and promote the use of the best performing equipments.

Other mitigation measures

On the technical but efficient solution of bio-beds, it has been proven that installing in the ground a tub filled with a balanced mix of soil, peat and straw, makes possible the reduction of point pollution coming from filling and washing sprayer equipment.

Even if modern bio-beds are effective and safe, more research and ideas coming from application, could improve the system in terms of evaporation, chemicals degradation and usage of local materials for the compost preparation.

Indicators to monitor progress and impact

Across the EU, Member States are now committed to implementing strategies to transpose and fulfil the objectives of the Sustainable Use Directive as part of the European Pesticides Package. As part of this process, Member States will have to select adequate and appropriate Risk Indicators that can identify the impact of

strategies and identify those options that will deliver the greatest benefit.

Indicators could be divided into two groups, state indicators and pressure indicators. Those categorised into the first group permit comparison between ecosystem conditions from year to year therefore permitting evaluation of the objectives and underlining the critical aspects. Pressure indicators are predictive assessments of the effects that could take place; they are useful to identify time, space and type of possible events.

If simple pressure indicators are already available, state indicators need fundamental development finding measurable fingerprints of pesticides effect that can secure protection of the ecosystem.

In Belgium, it has been developed PRIBEL, a pesticide risk indicator that covers consumers, farmers, birds, bees, aquatic organisms, earthworms and underground waters. It aims to monitor the pesticide impact following the measures in the Federal Programme for Reduction of

Pesticides and Biocides. It is designed to give risk managers a better perception of the bottlenecks of pesticide usage in specific crops and tackle particular problems in an efficient way.

Sweden on the other hand has adopted a Risk indicator based on a modified version of the US Pesticide Toxicity Index (PTI) and has been monitoring long-term trends of pesticide residues in stream water for 19

years, collecting a huge amount of data. Interestingly enough, they achieved a 90% of residues concentration reduction in analyzed water samples despite the minor decrease in applied amounts of PPP in the area. This suggests that awareness amongst farmers on good agricultural practices and the correct handling of pesticides has been enhanced, demonstrating the relevance of supporting training for farmers.

The indicators are essential to evaluate the progress towards risk reduction and they are tool to communicate to society the improvements.

Any such set of indicators should take into account the impact of the measures on environmental, social and economical aspects of the agricultural production.

The indicators should become a tool in assisting decision making on the continuation, enhancement or suspension of certain measures.

OPERA Conclusions

1. Regardless of the solutions chosen for the implementation of the different provisions of the SUD, attention has to be paid on the implications for the different actors in the agricultural sector and the benefits these solutions bring to society and environment. The economic crisis requires that any implementation solution has to be judged also against the economic and social implications.
2. The general context, of rising food prices and global lack of progress towards food security (including the aprox. 20 million people undernourished in EU) can not be ignored. Adoption of new solutions and promoting the use of efficient ones, can pave the way towards reaching the objectives of the directive without excessive negative impact on the productive sector.
3. There is a diffuse perception that organic food demand is increasing but on the other hand the food request, generally speaking, has a slope even higher. Here questions about sustainability and competitiveness of modern European agriculture compared to the third countries start rising.
4. Europe has decided to put in place the highest standards for approval of chemical compounds used in plant protection. It has to be acknowledged that these thresholds do not need top-ups from artificial measures with low benefit to the society. SUD needs to concentrate on reducing the risk in the use of PPP and not becoming a new filter for the tools available for the agricultural production.
5. It has to be kept in mind that reducing the European production of certain commodities would only create more room for imported products. Some substances banned in the EU are still used in third countries and it has to be noted that agricultural practices are not implemented at a similar level to the EU ones. The knock-out effect is that the risk for the consumers and the impact on the environment rise significantly.
6. Scientific analysis has to be considered as a useful and objective pillar to take the future political choices regarding not only agricultural sector but also consumers and the society.
7. We consider important to organize wide public consultations, to involve all actors to discuss about transposition of the SUD at country or regional level in order to identify the best possible solutions.
8. After 10 years of research at EU level on risk indicators, an agreement between politicians and the scientific community has not yet been reached. One of the reasons is the existing critical data gaps. A possible solution is to identify a balanced combination of the existing indicators, collected and calculated already, to be able to judge the progress of implementation and the impact of different measures.
9. There is a strong need for identifying harmonised solutions for certain elements of

implementation, like training, certification, machinery inspection, etc.

10. Also it seems necessary to incentives the existing solutions for risk reduction developed by different actors as well as scientific research to set up appropriate innovative technologies and equipments ensuring higher safety standards for all subjects involved.

The significant and interested participation at the meeting suggested the possibility and opportunity to work more in the future about further aspects of the Directive implementation which have not been discussed enough yet, such as the economic impact. Also, it came out clear that we need to continue our activities to provide the opportunity of further in detail debate of specific provisions of the SUD and its respective implementation solutions...

Annex 1.

Questionnaire for the participants

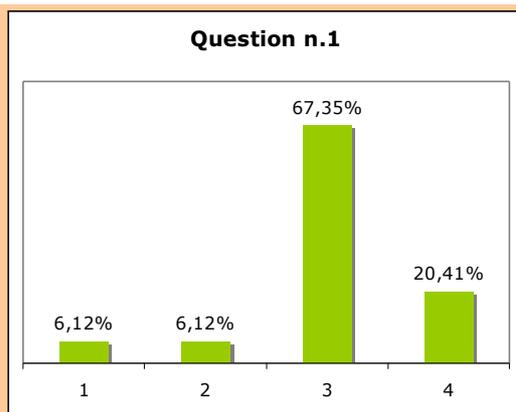
During the Informal Expert Group on the implementation of SUD meeting the participants were requested to answer an electronic questionnaire on issues related to the implementation of the directive. There were proposed 8 multiple-choice questions covering three different subjects:

- A) The transposition of SUD into the national legislation (4 questions)
- B) The development of National Action Plans in the member states (2 questions)
- C) The public consultation of national stakeholders (2 questions)

A) The first topic -The transposition of SUD into the national legislation: process and difficulties included 4 questions as follows:

a) Who is going to receive the major benefits of SUD?

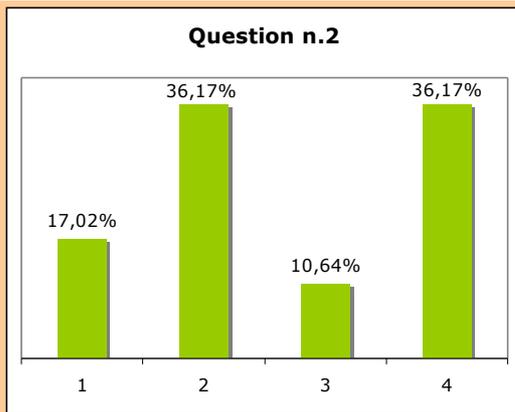
- 1) *Consumers, because they obtain safer food*
- 2) *Farmers, due to the adoption of safer work practices*
- 3) *Society, because of reduced environmental impact*
- 4) *Importers, since increasing domestic prices, will improve very much their competitiveness on the internal market*



The participants indicated that the major benefit of the measures will be received by the whole society (67%) but also the importers got a relevant preference (20%). The added value in terms of safety for the consumers is considered marginal, meaning that the safety level is already ensured. It was also revealed that the implementation will have a negative effect on the competitiveness of European products compared with the imported ones, hence the call for pragmatic implementation and balanced measures.

b) Do you think that the SUD could decrease the agricultural productivity in your country?

- 1) *Yes, because the production will be more work intensive*
- 2) *Yes, because the costs of the inputs will increase*
- 3) *No, because additional costs will be covered by an increase in production*
- 4) *No, because our national law already includes some parts of the SUD*

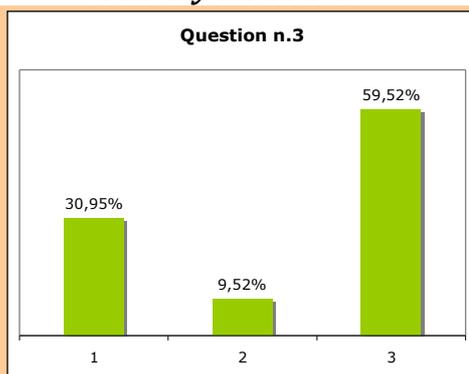


Regarding this question the result was more equilibrated: the first two possible answers got together 53.19% of the votes expressed by participants.

There is a strong concern, even if it is a close result, that the implementation of SUD will determine a decrement of the productivity.

c) What is in your opinion the most important step that should be taken regarding the transposition process of the SUD provisions into the National legislation?

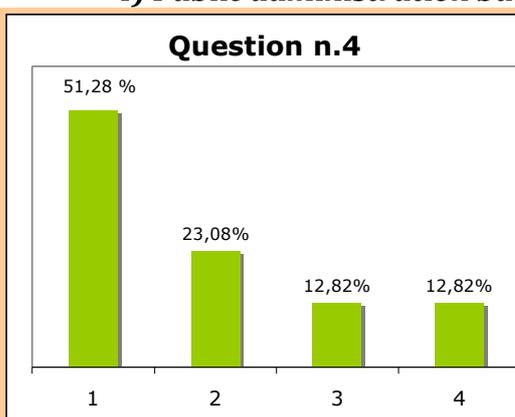
- 1) Reviewing all phytosanitary national legislation in relation to the SUD provisions*
- 2) Drafting a new legislation by the MS authorities disregarding existing provisions*
- 3) Conducting an evaluation of the situation in practice and the existing voluntary initiatives*



The strong preference for a thorough evaluation of the situation in practice indicates the willingness to implement the provisions taking into account the national and regional specificities. It also shows that a review of the national regulatory provisions is necessary and that the solutions for implementation need to be pragmatic and effective.

d) Parts of SUD are already present in some national legislation. However, it might represent a big financial burden for those countries that still have to adjust their business. Who do you think could be the most affected?

- 1) Farmers*
- 2) Pesticide Industry*
- 3) Public administration*
- 4) Public administration but it will be a limited burden*



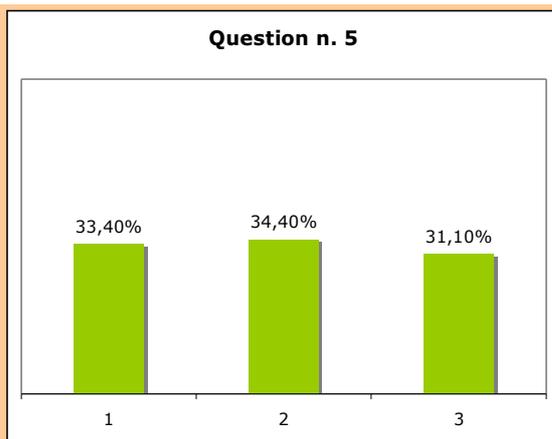
Half of the participants voted to indicate that the farmers will be mostly affected by the new provisions.

We could interpret this result by the fact that the effects of the SUD are uncertain (especially for countries that still have to adjust their business) and in the opinion of our expert group the most important stakeholders risk to be affected.

B) The second topic -The development of National Action Plans in the member states

e) Do you think that in achieving a quantitative target to reduce risk of pesticide means?

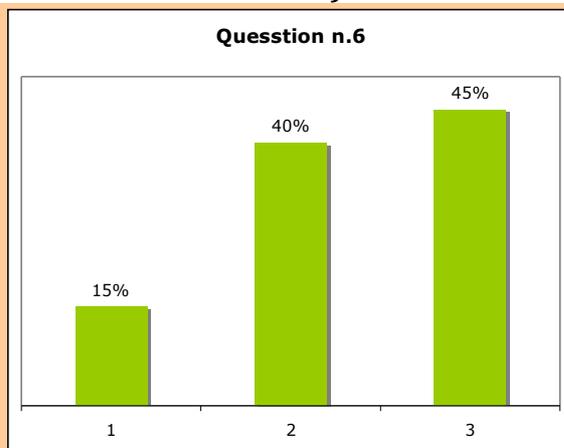
- 1) *Establishing a certain measurable benchmark for the aggregated risk reduction?*
- 2) *Achieve a certain quantity reduction through implementation of mitigation measures in all situations envisaged by the SUD?*
- 3) *Promoting alternative solutions for pest control?*



For this question every possible answer got almost the same percentage of votes. It means that there is no common understanding of the main objective of the directive, even if the legislator has put emphasis on the need to reduce the risk and in measurable way to evaluate the progress towards this aim. It seems that sometimes for reasons independent from the technical implementation of the directive, there is a preference towards quantitative reduction even if (according to previous results) this will not provide more safety for the consumers and it will impact on competitiveness.

f) Do you think MS should recover from farmers and other private actors the costs associated with the work pursuant to obligations under the Directive?

- 1) *No, as one cannot charge a cost to someone else who has no competence to decide on the cost.*
- 2) *No, because these measures address a general public interest.*
- 3) *Yes, but only for some measures and to cover from public funds elements like education and information.*



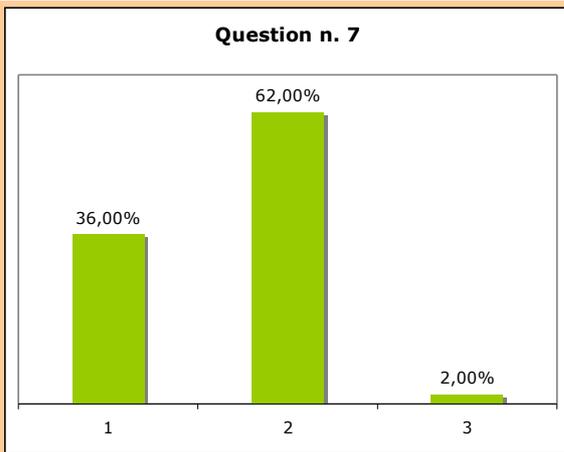
The preferences expressed for answers 1) and 2) amounting 55% of the group shows that stakeholders think that farmers and private actors do not have to pay the costs generated by the directive.

C) The third topic - public consultation of national stakeholders was addressed by two questions related to the approach and to the instruments to be used in consulting

stakeholders.

g) What would be the best approach authorities should have in consulting stakeholders?

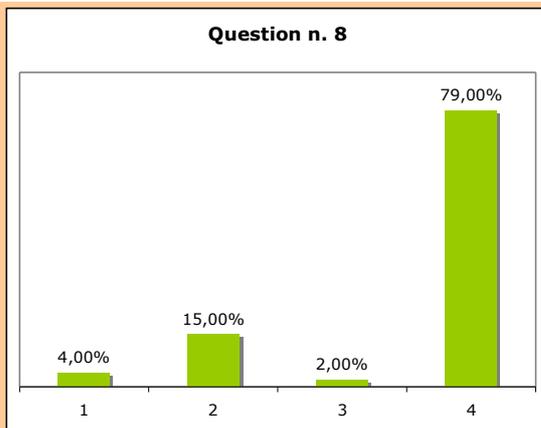
- 1) Consult only relevant stakeholders regarding transposition and NAP's.**
- 2) Undergo a public consultation of all stakeholders from different sectors as well as the civil society that might be affected by the SUD provisions.**
- 3) Consult only other public institutions.**



The majority of the group voted for the answer 2) reflecting the need of a wide consultation of all stakeholders in order to identify the best solutions for implementation.

h) What is form of consultation you think would bring best results?

- a) Internet questions.**
- b) Stakeholder meetings.**
- c) Public debate.**
- d) A combination of those mentioned above.**



The 4th answer was chosen by the large majority of the participants showing that a single instrument is not enough to ensure balanced consultation.

Annex 2.

List of participants*

OPERA Informal Expert Group on the SUD implementation
Brussels, 14 June 2010

	Name	Surname	Organization
1.	Juliette	Auricoste	Ministry of Agriculture France
2.	Davide	Barnabe	Compagnia delle Opere Agroalimentare
3.	Katarina	Benovska	Ministry of Agriculture of the SK
4.	Karel	Bolckmans	Koppert BV
5.	Xavier	Bourgeois	AgriBrussels
6.	Maura	Calliera	OPERA Research Centre
7.	German	Canomanuel	Syngenta ES
8.	Ettore	Capri	OPERA Research Centre
9.	Claudia	Castell-Exner	EUREAU
10.	Miriam	Cavaco	Ministry of Agriculture Portugal
11.	Jita	Cernohlavkova	PAN Europe
12.	Paul	Chambers	NFU
13.	Henriette	Christensen	PAN Europe
14.	Riccardo	Cossu	Regione Lombardia
15.	Arlette	Curez	EFFAT
16.	Vincent	Dalmau	Regional Ministry of Agriculture Valencia
17.	Romano	De Vivo	Syngenta CH
18.	Tineke	De Wilde	Universiteit Gent
19.	Erica	Durigon	OPERA Research Centre
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