



completed to date. SANTE F3 summarised the outcome/results from IPM training sessions already completed. In this regard, the summary showed that all 10 checklists produced within the frame of the training exercise included specific IPM measures under each of the 8 principles, also identifying potential inspection methodologies to be used in order to verify those.

DE sought clarification on the outcome of the meeting and, in particular, its legal status. SANTE F3 clarified that the outcome of the meeting would not be legally binding. SUD evaluation is ongoing, with a new legislative proposal expected in 2022. Nevertheless, MS need to act to control IPM, as the implementation of the general principles of IPM became mandatory in 2014 under the current EU legislation.

## 2. DG AGRI:

The first presentation of DG AGRI was given by [REDACTED], and it was about the IPM toolbox project. This is a 23 month study, which started in January 2021. There will be 12 case studies in at least 10 MS. The study will identify barriers reducing dependency on PPPs, identify strategies to scale up good practices, and set up an EU database (in English, intended for CAs, advisory services) of relevant information/guidance to help farmers reduce dependency on PPPs. In parallel, DG AGRI are converting FADN (Farm Accountancy Data Network) to FSDN (Farm Sustainability Data Network). Under FSDN, agri-environmental data will be collected at farm level.

The second presentation was given by [REDACTED], and it outlined how the proposed CAP is linked to IPM enforcement. In parallel of the implementation of the National Action Plans under the SUD, each MS will have to develop a CAP Strategic plan for the future CAP, including a SWOT analysis. The Commission will assess and approve these plans, which may be updated each year. As regards the sustainable use of pesticides and IPM in particular, Member States will have to make a consistent link between the CAP plans and the implementation of the SUD. In particular, on the basis of the IPM practices developed under the SUD (in particular the “crops/sectors-specific guidelines”), MSs will have to describe in their CAP Plans the IPM practices –voluntary for farmers- that they want to finance by CAP funding and the compulsory IPM practices that cannot be funded by the CAP (so-called “baseline” of CAP schemes). The compulsory IPM practices will need to be included in the system of conditionality through the relevant instruments (GAECs and SMRs) to make a link between these practices and the granting of CAP payments in general.

DG AGRI also emphasised that following the Farm to Fork Communication, the overall ambition of implementation of IPM should be higher than now. This should also be reflected in the CAP Plans, where the set of compulsory IPM practices (conditionality-relevant) and additional voluntary IPM practices (relevant for support schemes) should be more ambitious than currently.

Following the second presentation by DG AGRI, DK had a question on the expected outcome of the meeting, because in their view, there are two different issues. The first issue is to define EU harmonised guidance on IPM enforcement, where in the context of CAP, each MS will need to define their own solution.

In response, DG AGRI stated that the implementation of the SUD and the CAP are indeed two different issues but which are linked. MSs must define crops/sectors- specific guidelines to implement the 8 IPM general principles at farm level. The practices defined in these guidelines would then be translated into the CAP Plans as either part of conditionality (compulsory practices) or part of support schemes (voluntary) which go beyond the baseline of compulsory practices.

### **III. Presentations by MSs:**

#### **1. Germany**

DE had a 66 farm demonstration project from 2011-2018, provides ongoing training and provides pest monitoring information to growers via the Lander websites. There are now 12 sector specific IPM guidelines already approved, and seven under development. IPM is part of "good professional practice in plant protection". Everyone who carries out plant protection measures is obliged by §3 of the Plant Protection Act to observe "good professional practice in plant protection" and in particular the general principles of IPM. Professional users are not required to keep records relating to IPM and inspectors have different levels of expertise in IPM and assess individual management practices. Following the IPM workshop in Grange in 2019, Germany started to assess IPM in 2021, based on a modified checklist presented by Ireland at the 2019 workshop. The checklist is used as a guideline by the inspector for an interview with the grower at farm level. The accompanying brochure explains the general principles of IPM with pictures and examples. The flexibility of IPM (which is necessary due to differences between seasons, crops and farm types) is an obstacle for controls, as it makes it difficult to have clear verifiable criteria for compliance/non-compliance.

#### **2. Poland**

PL started by outlining the support tools available for promoting of IPM and its implementation. These include the system in place for early warning, decision-support system, crop-specific IPM Guidelines (about 70) and specialised training, including demonstrations for both growers and CAs' own staff. Official controls at PPP professional users cover issues related to the proper use of PPPs, including SUD related aspects, such as certification of operators, PAE, PPP use records, PPP storage. With regard to verification of IPM implementation at farm level, official controls cover IPM measures applied for prevention and non-chemical alternatives applied, as well as aspects related to decision-making, including pest monitoring, use of thresholds, meteorological conditions, use of early warning systems and/or advisory services. Another aspects checked during inspections includes action taken to minimise the risks arising from PPP use (partial application, lower dose, selective PPPs, reduced number of treatments). In terms of obstacles for IPM enforcement, PL mentioned the assessment of IPM implementation based on farmers' statements/oral declarations, separating the provisions on PPP proper use and on IPM implementation, where most of the individual IPM requirement/measures are rather ambiguous than based on legal provisions.

### 3. Denmark

DK outlined that for each of the 8 IPM principles there are different levels at which it will be implemented, e.g. farm level, field level, pesticide application etc. In DK, all professional users are required to follow IPM, and IPM should be applied to all conventional crops, but there are no provisions for labelling or additional pricing, like for organic. DK has an IPM evaluation scoring system, allowing farmers to score themselves at farm level. Other supporting measures include educational requirements, economic incentives (through taxation), financial support for demonstration farms and funding IPM research. Until now, DK has not carried out controls of IPM at farm level.

From January 2020, a new digital IPM scoring system came into force, that farmers have to fill out themselves. The farmer will see the result of the 14 questions he has answered, but these are not visible for the authorities. There will be checks on 1.5% of farms each year as to whether or not it has been filled out. In DK, they have the view that IPM should not be regarded as something fixed, as it is constantly changing. They do not see that it is feasible to establish fixed IPM requirements at farm level. DK don't believe that authorities can control IPM using tools like a spraying journal, as the administrative burden would be too high, and it would not be possible to judge if the recorded information was correct. It would also need a lot of expert knowledge to control this for each sector.

DK expressed their opinion that a more realistic solution would be for each farmer to complete an IPM evaluation table, with a series of questions, on an annual basis, and thus they would be forced to learn and consider IPM options. If it has a points system, then the farmer would know if he has a high or low score and it can be point for a dialogue for the farmer and advisory services. Authorities can control if the IPM evaluation table is filled in or not, and thus if IPM has been considered on the farm. DK has developed an indicator to measure IPM at national level (pesticide load, based on PPP sales and use data).

In response to a question from DE on the information, which is automatically filled in from the PPP use records, DK explained that there are three different kinds of questions, including the following:

1. Do you use PPPs with a different mode of action (if so, higher points are allocated for this);
2. Do you have a higher or lower pesticide load on your farm compared to last year (this data has already been submitted via the PPP use records reported to authorities on an annual basis, so it can be calculated and the farmer can see the results);
3. Does crop rotation add value in terms of IPM (e.g. wheat following oil seed rape is better than wheat following wheat) (DK has an indicator to rank the value of crop rotations).

In response to a question with regard to sources of information on the use of PPPs, DK explained that it is a legal obligation for farmers, with farmland above a certain size, to submit their data from the PPP spraying journal (PPP application records per crops, and not per plot) each year. There is a software package, which farmers can use to keep records on PPP use, as well as for upload data from the spraying journal for the purposes of this annual reporting.

#### 4. Hungary

HU has converted IPM principles into a series of yes/no questions and controls professional users using two checklists, for annual field crops and orchards. All requirements on the checklist must be complied with, in order for PPP professional users to be deemed compliant. Some examples were given with regard to questions in the check-list, i.e. Are certified seeds used? (Checked by invoices), Are PPPs used based on forecasting? (Checked based on records kept by the farmer), and is mechanical weed control used in orchards (Checked based on records kept by the farmer). In 2020, there were 800 inspections, with high levels of compliance, with non-compliances mainly relating to the use of certified seed. In HU, professional users are obliged to record PPP use and keep invoices for inputs, with no other PPP/IPM records required. Non-compliant growers were not sanctioned in 2020, and possible sanctions were limited only to growers in receipt on additional payments under voluntary agri-environmental schemes.

In response to questions from DE and Commission on record keeping, HU clarified that, at present, records are kept on paper, but work is on-going on developing IT solutions for it, and the standard form for record keeping is limited to PPP use only, as these are a requirement under the current legislation. In addition to records on the PPP use, growers shall keep invoices for agricultural inputs.

LT asked a question with regard to sanctions imposed in the case of IPM related non-compliances. HU explained that IPM assessment of compliance at farm level is still in an early stage, whereas it will be obligatory to impose sanction in the case of non-compliances from now on. However, inspections at farm level in 2020 did not identify such non-compliances.

#### 5. Lithuania

LT are currently amending national legislation relating to IPM. It has a pest monitoring/forecasting system, and has developed crop-specific IPM guidelines for the main crops, which are made available to professional users. An IPM questionnaire has been used since 2014. However, these IPM questionnaires have not been part of official controls at farm level, but results were used by the relevant authorities in the context of policy needs and drafting new or amending existing national legislation in this policy area. The questionnaire includes a wide range of questions, i.e. Is there a planned crop rotation?, Is certified seed used?, What cultivation method is used?, What decision-making with regard to PPP use is based on?, etc. LT expressed their view that more detailed EU legislation, or guidance, or IPM record-keeping requirements are needed in order to implement IPM.

#### 6. Croatia

HR described, in brief, their early warning/pest monitoring system. The Ministry of Agriculture is drafting a new Act on the sustainable use of pesticides relating to advanced IPM (above the baseline), demonstration farms and IPM guidelines. IPM is controlled using checklists, with yes/no answers, where verification is based on invoices and responses from the farmer. In 2020, 759 controls were undertaken, but no penalties have been applied in

cases of non-compliance. IPM controls are time consuming and require highly trained staff, both of which were identified as obstacles for IPM enforcement.

#### 7. France:

FR described the overall national framework for IPM, and a number of websites for disseminating information relevant to IPM. The inspection services conduct about 5,000 controls per year on farms, and an IPM checklist/questionnaire will be used in these controls from 2021 onwards. It will seek to determine if the grower followed the advisors advice and information on the use of bio-controls, resistant varieties, mechanical weeding etc., where advisory service is an obligation for growers, and in the case of non-compliance identified, advisors could be the ones to be penalised. FR opinion is that the inspectors level of knowledge and IPM not falling under the CAP are the main obstacles for IPM assessment.

### **IV. Discussions**

#### 1. Discussion on preferred options to control the implementation of IPM

SANTE F proposed that one of the MS attending the meeting should present the conclusions at the next SUD WG meeting in April. It was outlined that, based on presentations given, two approaches to controlling IPM were identified, as follows: the Danish model of using a checklist and a scoring system, and the use of a checklist with yes/no questions in the case of all other MSs.

DE do not favour the group recommending a single approach to controlling IPM and emphasizes the need to have an exchange of view with all MS. .

HR was in favour a harmonised, non-binding checklist which could be tweaked by each MS.

PL stated that, even using a checklist, it is difficult to determine compliance with IPM, e.g. what rotation is IPM compliant? In some cases, e.g. apple varieties resistant to scab, consumers will not purchase these apples, so growers do not use these resistant varieties.

LT suggested fewer IPM principles, focusing on those which are easy to measure e.g. use of certified seed and crop nutrition, thus simplifying the criteria for IPM assessment. LT highlighted again that this should be an action at EU level.

In response, SANTE noted that the Commission does not have the expertise/knowledge to determine criteria for compliance/non-compliance, so MS must determine these to evaluate compliance.

DE noted that all eight principles are not equally enforceable from one year to another, because for example planned rotations could not be implemented due to extreme weather events.

DK noted that a checklist with yes/no answers is not an appropriate way to control IPM, because IPM assessment is not a “ticking boxes” exercise and that the authorities would not be able to check if information filled in such ticking boxes indicate actions that have actually

taken place. In addition, it would require a lot of agricultural knowledge and be very time-consuming for the control authority. DK asked what the legal basis of any agreement at this meeting would be. In response, SANTE clarified that they are not seeking to develop a single checklist for use in all MS, but rather agreeing an approach, which could work across MSs. As an example, SANTE stated that not all points under principle 1 (as per Annex III to the SUD) are to be complied with in all cases. The Commission want to see MS starting to enforce IPM, and improve their controls over time. The SUD evaluation could clarify or improve the legislation in this area based on MS experiences of enforcing IPM. For this meeting is to decide on the approach to go for and, if using a standard checklist is something that could be used in all MS, then it would be left to MS to develop these. It is the role of the CA to decide what is relevant in their specific situation. SANTE underlined that IPM enforcement is a must, as IPM became a legal obligation from 2014. Start enforcing should be the first step to make in the process.

DE noted that MS are making progress on enforcing IPM since the 2019 IPM workshop, and suggested an additional workshop to support MS in enforcing IPM, but does not see any need to change SUD in this area.

DG AGRI noted that the CAP will help farmers to implement IPM, but MS will need to describe in their CAP Plans the difference between normal practices (baseline IPM), which should be included under conditionality and additional actions, for which CAP funds can be claimed.

LT and HR noted, and DG AGRI confirmed, that different MS could decide on different baseline standards, due to different agro-climatic conditions in each MS. These different baselines could result in differences of approaches in different MS for the funds being paid by the CAP for IPM practices.

HU is not in favour of a common EU checklist, but think that those MS, who have not yet introduced any IPM assessment system, should control IPM using a checklist.

DK acknowledge that a checklist is useful to raise awareness, but given the complexity of IPM does not favour using checklists for enforcement purposes.

**Conclusion: Each MS should develop a customised checklist to control IPM**

## 2. Discussion on policy options for the revision of the SUD

DK acknowledge that improved record keeping of a few IPM issues may increase focus on IPM implementation at farm level, but cautioned that the difficulty in determining compliance/non-compliance would remain, thus this requirement will not or will only partly be valuable for enforcement.

HR favour additional IPM records to facilitate controls, but noted that this would increase the burden on users. HR also favour more specific IPM rather than the current general principles, as per Annex III to the SUD.

DK noted that making use of advisory services mandatory for all farmers is not relevant in all MS. In some MS, most farmers already use advisory services, in others they may not. It should be up to the individual MSs to decide if advisory services should be mandatory e.g. for specific categories of farmers if this could be useful.

PL have IPM guidelines for 70 crops, but noted that it is not realistic to make following the guidelines mandatory.

DG AGRI emphasised that, if MS choose to support IPM actions using voluntary measures under the new CAP, they will need to describe the baseline of compulsory IPM practices.

DK favour more frequent, mandatory additional training, focusing on IPM, in order to keep professional users up-to-date on IPM practices.

FR noted that the mandatory receipt of advice is new in France, but it appears to be cost neutral, as reduced PPP use balances out the additional cost of the advisor. DEPHY farms show a 30% reduction in PPP use is possible. On average, French farmers spend 10, 000 EUR per year on PPPs.

LT do not favour the mandatory receipt of IPM advice.

**Conclusion: Most of the MS are in favour of setting out requirements for extended recordkeeping to facilitate verification during official control. However, MS do not support any further amendments of Article 14 and, in particular, advisory services and following IPM Guidelines to become obligations for PPP professional users.**

MS requested, and the Commission agreed, that the Commission would present the conclusions of this meeting at the SUD WG meeting in April.