

**From:** [redacted]@minInv.nl>  
**Sent:** 20 January 2021 17:26  
**To:** SANTE SUD; [redacted] (SANTE)  
**Cc:** [redacted] (SANTE)  
**Subject:** RE: SUD WG members: Follow up to SUD BTSF workshop 17-19 Nov: possible future policy options  
**Attachments:** NL comments on Possible policy options to SUD WG members.docx

Dear [redacted], dear [redacted]

In reply to your request for reply to the document with possible future SUD policy options, hereby we inform you about some preliminary thoughts on possible developments in the sustainable use of pesticides, based on experiences and personal views of colleagues of the Ministry of Agriculture, Nature and Food Quality and the Netherlands Food and Consumer Product Safety Authority (NVWA, responsible for plant protection advices and enforcement).

As stated before, we believe it is premature to come with a formal position on possible policy options for the SUD as the review of the directive is still ongoing. However, we welcome a discussion to improve the sustainable use of pesticides and are willing to contribute to it. In September 2020 the Dutch government, together with a number of stakeholders, agreed on an Implementation programme to work towards a transition to resilient plant and cultivation systems, a better connection between agriculture and nature and to negligible emission of PPP's to the environment. But that does not mean that there is a need for more stringent EU harmonized regulations. For most of the points mentioned in the Commissions document with possible SUD policy options, we believe that the current SUD provides sufficient tools for the sustainable use of pesticides.

However, we would like to comment on the issues (1) IPM, (5) Coloured coded labelling of PPP's, (9) prescription systems for some PPP's, (13) (legally binding) targets to reduce use and risks and (15) Harmonised risk indicators

See enclosed our preliminary comments on your document.

Kind regards,

[redacted]  
[redacted]  
Plant Supply Chain and Food Quality Department  
Ministry of Agriculture, Nature and Food Quality  
The Netherlands

E [redacted]@minInv.nl

T +31 [redacted]



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**Van:** [redacted]  
**Verzonden:** vrijdag 15 januari 2021 17:09  
**Aan:** 'SANTE-SUD@ec.europa.eu' <[SANTE-SUD@ec.europa.eu](mailto:SANTE-SUD@ec.europa.eu)>

CC: [redacted]@ec.europa.eu

**Onderwerp:** RE: SUD WG members: Follow up to SUD BTSF workshop 17-19 Nov: possible future policy options

Dear [redacted],

I would like to inform you that we are still working on a document with some preliminary and initial comments on your paper with possible future policy options for the SUD. As the evaluation process of the SUD is still ongoing, we believe it premature to come with a formal position. Nevertheless, we would like to share some thoughts with you.

We hope to send it to you in the course of next week.

Kind regards

[redacted]  
Plant Supply Chain and Food Quality Department  
Ministry of Agriculture, Nature and Food Quality  
The Netherlands

E [redacted]@minlnv.nl

T +31 [redacted]



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**Van:** [SANTE-SUD@ec.europa.eu](mailto:SANTE-SUD@ec.europa.eu) <[SANTE-SUD@ec.europa.eu](mailto:SANTE-SUD@ec.europa.eu)>

**Verzonden:** donderdag 17 december 2020 18:23

**Aan:** [SANTE-SUD@ec.europa.eu](mailto:SANTE-SUD@ec.europa.eu)

**CC:** [SANTE-SUD@ec.europa.eu](mailto:SANTE-SUD@ec.europa.eu)

**Onderwerp:** SUD WG members: Follow up to SUD BTSF workshop 17-19 Nov: possible future policy options

Dear Colleagues,

We hope that you are keeping well.

Many of you attended the one-off SUD BTSF remote workshop from 17-19 November (agenda attached).

During the breakout sessions on 19 November you discussed possible future policy options linked to the SUD or how to better achieve its objectives in the future.

However the discussion time available was limited and some of you suggested that a further engagement on these issues would be useful.

We attach to this mail a document listing those policy options which your feedback and comments indicated could be worthy of further discussion.

We would appreciate if you could send us **by 14 January please** your initial remarks on these policy options. You may already have some national experiences if you have already implemented such policy

options, for example on IPM record-keeping, a prescription system for pesticides, possibly higher taxation of pesticides etc. You are also welcome to tell us your initial views on what could be the feasibility and advantages/disadvantages of implementing each policy option in your country or at EU level, relevant aspects that you believe the Commission should take into account in investigating these policy options. You may also wish to share some background or information documents on some of the topics that you think could be useful for us and your colleagues to read.

You are also free to suggest additional policy option topics if you believe we have overlooked something.

After 14 January and based on your feedback comments we will consider if it would be helpful to organise some short virtual meetings with you to discuss some specific topics and the input you have provided.

Thank you for your assistance and best wishes to you all for Christmas and the New Year,

Best regards,



**EUROPEAN COMMISSION**

DG SANTE – (Directorate-General for Health and Food Safety)

Unit F3 - Plants and organics

Directorate F – Health and food audits and analysis

Grange, Dunsany

IRL - Co. Meath

Tel: +353 46 [REDACTED]

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