

STUDY SUPPORTING THE EVALUATION OF DIRECTIVE 2009/128/EC ON THE SUSTAINABLE USE OF PESTICIDES AND IMPACT ASSESSMENT OF ITS POSSIBLE REVISION

PRELIMINARY EVALUATION FINDINGS

PRELIMINARY FINDINGS - RELEVANCE

Key evaluation question

- To what extent are the SUD's objectives and required actions relevant today to address the current needs and problems and expected developments related to the use of pesticides in the EU?

Main finding

- The objectives and actions of the SUD remain highly relevant. Developments (political targets, awareness in society, technologies) since adoption have further underlined the relevance of the legislation regulating the use phase of pesticides in the EU.

PRELIMINARY FINDINGS - EFFECTIVENESS

Key evaluation question

- To what extent have the actions envisaged by the SUD contributed to achieving its objectives?

Main finding

- Effectiveness is mixed: Evidence shows Member States have taken action to implement the SUD, however positive effects in terms of risk reduction and reduction of dependency cannot be established with the data currently available.
- The aim of being able to monitor progress and review actions accordingly is not being achieved because data on sales and use has shortcomings, IPM implementation is not monitored.

PRELIMINARY FINDINGS - **EFFECTIVENESS**

Key evaluation question

- Which were the key contributing and hindering factors in achieving the intended objectives?

Main finding

- Factors at different levels hinder the full achievement of the objectives of the SUD, main emerging factors were the varying implementation in Member States, little enforcement by the Commission and lacking viable alternative for users.

PRELIMINARY FINDINGS - EFFICIENCY

Key evaluation question

- Which elements of the SUD pose an administrative burden or are overly complex? What are the administrative costs for the different actors?
- To what extent were the SUD's costs proportionate to its benefits (i.e. positive outcomes)?

Main finding

- Little evidence was found to indicate overly burdensome or costly elements of the current SUD.
- Farmers seem to bear many of the direct costs (through fees) and risks (loss of yield) while they do not have many direct economic benefits.

PRELIMINARY FINDINGS - COHERENCE

Key evaluation question

- To what extent has the SUD created an effective and coherent link with other EU legislation and policies related to the use of pesticides?
- To which extent is the SUD dependent on implementation of the linked legislation in achieving its objectives?

Main finding

- Overall high coherence of the SUD's objectives with other relevant EU legislation such as 2009 pesticide package, health and safety legislation and environmental legislation. Low levels of implementation and enforcement result in coherence challenges in practice.
- Dependency on Regulation 1107/2009 and Pesticide Statistics Regulation, with partial overlaps on IPM and use instructions.
- Lacking synergies with the CAP, where sustainable pesticide use was so far not considered in cross-compliance.

PRELIMINARY FINDINGS – EU ADDED VALUE

Key evaluation question

- To what extent has the SUD produced additional value compared to what could have been produced at national or regional level in its absence?
- To which extent did the SUD strike the right balance between action at EU level and national action? Is it a proportionate response to the problem?

Main finding

- Two main elements of added value are identified: (1) the creation of a harmonised framework for the use of pesticides and (2) the awareness raising for sustainable pesticide use.
- The possibility for national action is valuable to adapt the SUD's measures to national and regional conditions. However, the role of the Commission in ensuring effective implementation of the SUD is found to be weak and does not reap the potential of a harmonised framework.

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Contact: SUD_study@ramboll.com