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Sent: lundi 15 août 2022 11:37
To: SCHREIBER Kristin (GROW); [REDACTED] (GROW)
Cc: [REDACTED]
Subject: Follow-up exchange on CSS Bayer / DG GROW 26 July
Attachments: 34905 - CLE input on PMT criteria in response to CARACAL Meeting [34905].pdf; 35004 - CropLife Europe PMT Impact Assessment.pdf; SUD training obligations farmers.pdf

Dear Ms. Schreiber and colleagues,

thank you once again for the exchange a few weeks ago regarding the EU Chemical Strategy for Sustainability.

As agreed in the meeting, we would like to follow-up on some of the points discussed.

1. Introduction of new PMT hazard class under CLP

2. Extension of generic approach to risk management to professional users

During the meeting we had also discussed the need to **differentiate highly trained professional users** such as farmers or healthcare professionals from others and we would like to share some information regarding the EU-wide obligations farmers have to fulfill in the handling of plant protection products.

For example, [Directive 2009/128/EC](#) aims to achieve a sustainable use of pesticides in the EU by reducing the risks and impacts of pesticide use on human health and the environment. EU countries have drawn up National Action Plans to implement the range of actions set out in the Directive. The [main actions](#) under the Sustainable Use Directive (SUD) relate to **training of users, advisors and distributors of pesticides, inspection of pesticide application equipment, the prohibition of aerial spraying, limitation of pesticide use in sensitive areas, and information and awareness raising about pesticide risks.**

According to Chapter II, Article 5 of the SUD, Member States shall ensure that all professional users, distributors and advisors have access to **appropriate initial and additional trainings** by bodies designated by the competent authorities. The trainings shall be designed to ensure that participants acquire sufficient knowledge on the 13 subjects listed in Annex I of SUD, including: hazards and risks associated with pesticides for human health & environment (non-target plants, beneficial insects, wildlife & biodiversity); risk minimization measures such as safe working practices for storing, handling, mixing pesticides, disposing of empty packaging; emergency actions in case of accidents and first aid measures; use of pesticide application equipment and its maintenance; risk associated with illegal (counterfeit) products and methods to identify them, etc.

In Germany for example every professional user of pesticides has to acquire a so called “Pflanzenschutzsachkundenachweis” and has to do refreshing trainings at least every three years at an accredited organization.

In the context of the current revision of the SUD, these requirements will likely be further reinforced, including a broader set of training topics and a fixed validity of training certificates (10 years for professional users or distributors of plant protection products and for 5 years for advisors).

Furthermore, professional users are protected under the legal framework on the safety and health of workers at work, the chemical agents at work Directives and in addition certain sectors are subject to specific legislation which highly controls the exact manner in which the regulated products are used (e.g. biocides, plant protection products, etc). These regulations ensure that the exposure scenarios for such uses have inherently less uncertainty compared to other uses, are legally binding and subject to enforcement.

Please also find further information regarding the additional commitments regarding the training of farmers in the sector: [Protecting People - CropLife Europe](#)

Lastly, we would like to inform you that we are currently developing an overview of the potential impact of all CSS measures taken together on a specific group of chemical substances. As soon as this is ready we would be happy to share it with you for your confidential information. We also work in cooperation with Crop Life Europe to translate the impacts from CSS into the understanding what this means for the agricultural sector as a whole.

Thank you once again and we are available for any questions you might have.

Freundliche Grüße / Best regards,



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