

Glyphosate questionnaire (NL)

Teleconference, 29th March 2019

Please find below the proposal for agreement, based on the outcome of the glyphosate questionnaire. Please note that the proposal reflects the position of the majority of the Member States. Background information can be found in the summary of the questionnaire.

There is an urgent need to conclude on this discussion, since:

- The first glyphosate renewals are in a concluding phase, and
- given the sensitive political issue a harmonized interpretation of the specific provisions is of great importance.

After review and acceptance by the Member States, the final bullet could be published on circabc.

CZSC bullet point (draft): Interpretation of glyphosate specific provisions

The EU renewal regulation for glyphosate (2017/2324) states specific provisions for the assessment of PPP, amongst others:

- Only uses as herbicide may be authorised.
- Member States shall pay particular attention to compliance of pre-harvest uses with good agricultural practices (GAP).

This bullet point informs the applicants on how the Members States will handle with these specific provisions, in connection to several relevant pre-harvest uses.

For these relevant uses it is specified whether they are regarded as herbicide use, which is allowed, or as plant growth regulator, which is not allowed. Use as dessicant could cover both types and is therefore not mentioned as such, but split into either herbicide use or plant growth regulator use.

1. Full-field herbicide – for use against weeds in crops close to harvest:

- Full-field weed control close to harvest is not considered Good Agricultural Practice (GAP), as weeds should not be a problem in a mature crop. In addition an effect as growth regulator can not be prevented, which use cannot be authorized.
- Spot treatment, for weed control close to harvest on a limited area (max 10% of the total field) can be GAP (e.g. crop failure on flooded areas in the field, or local layering of cereals).

2. Herbicide/growth regulator - for use on the crop close to harvest:

- Use on crops close to harvest, for synchronizing the ripening of seeds, or maturation of the crop, falls under the definition of plant growth regulator use, and can not be authorized.
- Full-field use on crops close to harvest can not be authorized, as it does not concern stopping plant growth (herbicide use), but rather speeding up development (plant growth regulator use).

- Spot treatment, for removing the undesired plants or regrowth of the crop in partial areas close to harvest, falls under the definition of herbicide use. This can be considered as GAP, provided that the use is restricted to a maximum of 10% of the area.

3. Herbicide for grassland, cover crops or green manure crops.

Where the aim is to kill the plants/crop without harvesting a product (other than organic matter), this can be regarded as a herbicide use, and falls under GAP:

- When the crop is infested with perennial weeds.
- When the cover crop or green manure crop has a stronger competitive behavior compared to the next crop to be planted.