

Glyphosate questionnaire (NL)

Update after teleconference 29th March, version 10th April 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. **Comments by Germany dated 5th April 2019 have been incorporated.** The position of 5.1.2.a and 5.1.2.a) differs, and is not (yet) included.

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 agreement can be communicated by the Member States.

Please send your comments on **22 April** at the latest.

(as in NL a political discussion on this issue is scheduled for 23 April we would like to have all views before this date).

Please note, in response to questions from MS:

Spot treatment is defined as maximum 10% of the total area. Several member states use this 10% maximum as a standard rule. Spot treatment is fixed at a certain percentage for enforcement purposes, and to prevent that applicants claim odd percentages to just pass the risk assessment. However, this 10% seems not to be set in Guidance or agreements on a Central Zone or Interzonal level.

If well defined in the national label (dose defined per square meter and resulting maximum dose per hectare is 10% of dose at =full field treatment), spot treatment can be enforced through the administration of the use of plant protection products per field that farmers have to maintain.

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 desiccant 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 well-managed mature crop. In addition a simultaneous effect as growth regulator for the crop cannot 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 previously flooded areas in the field, or local layering of cereals).

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

- Full-field use on crops close to harvest for synchronizing the ripening of seeds, or maturation of the crop, cannot be authorized, as it does not concern stopping plant growth (herbicide use), but rather speeding up the life cycle of the plants. This is considered as plant growth regulator use and therefore cannot be authorized.
- Spot treatment, for preventing the undesired growth of 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 this can be regarded as a herbicide use. Provided that treated crop is not fed to live stock, this use can be considered GAP in case:

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