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COVER NOTE

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| From: | Secretary-General of the European Commission, signed by Mr Jordi AYET PUIGARNAU, Director | |
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| То: | Mr Jeppe TRANHOLM-MIKKELSEN, Secretary-General of the Council of the European Union | |
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Delegations will find attached document COM(2017) 109 final.

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REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL

on the implementation of Regulation (EC) No 1185/2009 of the European Parliament and of the Council of 25 November 2009 concerning statistics on pesticides

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1. Introduction

Article 7 of Regulation (EC) No 1185/2009 (hereinafter referred to as the Regulation) of the European Parliament and of the Council concerning statistics on pesticides stipulates that: 'The Commission shall submit a report on the implementation of this Regulation to the European Parliament and the Council every five years. This report shall evaluate in particular the quality of data transmitted, as referred to in Article 4, the data collection

particular the quality of data transmitted, as referred to in Article 4, the data collection methods, the burden on businesses, agricultural holdings and national administrations and the usefulness of these statistics in the context of the Thematic Strategy on the Sustainable Use of Pesticides in particular with regard to the objectives set out in Article 1. It shall, if appropriate, contain proposals designed to further improve data quality and data collection methods thereby improving the coverage and comparability of data and reducing the burden on businesses, agricultural holdings, and national administrations. The first report shall be submitted by 31 December 2016.'

2. COVERAGE AND CONTENT

According to Article 2 (a) of the Regulation, 'pesticides' refer to 'a plant protection product (PPP) as defined in Article 2(1) of Regulation (EC) No 1107/2009² or to a biocidal product as defined in Article 2(1) of Directive 98/8/EC'³. The Regulation stipulates that the Member States have to transmit annually to the Commission their statistical data on pesticides placed on the market each year (pesticide sales statistics). In addition, they have to provide statistics on pesticides used in agriculture (pesticide use statistics) in five-year periods. The data should include confidential data. The Member States also have to provide the Commission with reports on the quality of the data transmitted, and the Commission in turn has to assess the quality of this data.

2.1. Pesticide sales statistics

For pesticides placed on the market, the reference period is the calendar year. The first reference period was the second calendar year following 30 December 2009. Data is to be transmitted within 12 months of the end of the reference year, while the quality reports are due 3 months later. The data and quality reports transmitted so far cover reference years 2011 to 2014 inclusive.

Regulation (EC) No 1107/2009 of the European Parliament and of the Council of 21 October 2009 concerning the placing of plant protection products on the market and repealing Council Directives 79/117/EEC and 91/414/EEC (OJ L 309, 24.11.2009, p.1).

OJ L 324, 10.12.2009, p. 4.

OJ L 123, 24.4.1998, p. 1. Please note that Directive 98/8/EC has been repealed with effect from 1 September 2013 by Regulation (EU) No 528/2012 of the European Parliament and of the Council of 22 May 2012 concerning the making available on the market and use of biocidal products (OJ L 167, 27.6.2012, p. 1).

References to the repealed Directive shall be construed as references to Regulation EU) No 528/2012.

2.2. Pesticide use statistics

For statistics on the use of pesticides in agriculture, the reference period must be a period of a maximum of 12 months within each five-year period. The first five-year period started in the first calendar year following 30 December 2009. These data and quality reports are expected within 12 months of the end of each five-year period. The transmission of the data and quality reports of the first five-year period (reference years 2010-2014 inclusive) thus concluded in December 2015.

For both sets of data, the Commission (Eurostat) must aggregate the data before publication, taking due account to protect confidential data from the Member States. This means that the Commission (Eurostat) cannot provide any statistics on individual active substances.

The following chapters provide an overall assessment of the quality of the pesticide sales data transmitted by the Member States. This assessment is generated from the quality reports provided by the Member States as required by Article 4 of the Regulation. The quality criteria applied are laid down in Article 12(1) *Statistical quality* of Regulation (EC) No 223/2009⁴. The validation of the quality reports for the pesticide use statistics has not yet been finalised, and they are therefore not analysed below.

2.3. Data collection methods and sources

For most of the 28 Member States, and Norway, all underlying primary data on pesticide sales are derived from administrative sources for which reporting is obligatory under law. All countries except Denmark, Slovenia and Norway consider all information related to individual respondents as confidential. Most countries have no public databases, and aggregated data is usually available in statistical publications and/or web pages. In Belgium and Norway individual data is available on request. As Switzerland has a derogation, no quality reports are available. For more details, see Annex I.

2.4. Quality of transmitted data

All Member States, Switzerland and Norway are compliant on the coverage and timeliness of their data. Most countries provide their data sets on time and react in a spirit of good cooperation when further checks or corrections are required.

Concerning accuracy, reliability, and comparability, most countries stated that since their primary pesticide sales data was collected from administrative sources or from the

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Regulation (EC) No 223/2009 of the European Parliament and of the Council of 11 March 2009 on European statistics and repealing Regulation (EC, Euratom) No 1101/2008 of the European Parliament and of the Council on the transmission of data subject to statistical confidentiality to the Statistical Office of the European Communities, Council Regulation (EC) No 322/97 on Community Statistics, and Council Decision 89/382/EEC, Euratom establishing a Committee on the Statistical Programmes of the European Communities (OJ L 87, 31.3.2009, p. 164)

authorisation holders, they considered that the data supplied was accurate. In addition, sampling errors were not relevant, since only the actual administrative values were collected and estimates or samples were not used. However, different methods of data collection were used.

The Commission therefore considers that all primary pesticide sales data is accurate and reliable, since there were no computations or estimates of the values that the statistics were intended to measure. As a consequence, the aggregated pesticide sales data is also considered accurate and reliable.

In general, most countries reported taking the following precautionary measures to ensure the statistical quality required of their data:

- frequently reviewing and updating their questionnaires;
- taking account of problems reported and recommendations made by respondents in previous years;
- using a complete directory of authorised products;
- subjecting the data to internal quality control processes;
- storing the data in secure environments wherever it is protected by statistical confidentiality.

Pesticide sales data provides a good quality estimate of the total quantity of pesticide products placed on the market on a national basis. It can show trends in new types of pesticides, quantities of products over time and the subsequent risks for people and the environment. Such estimates could be improved in future by distinguishing between professional and 'home & garden' authorisations (i.e. for agricultural and non-agricultural purposes, respectively). Additional checks on data quality could also be envisaged for the volumes of remaining stocks. For more information, see Annex II.

3. RELEVANCE — USEFULNESS OF THE STATISTICAL DATA AND DISSEMINATION

3.1. Information received from stakeholders

Consultations with relevant Commission's services and agencies have brought forward the following important points for consideration:

• Any legislation on pesticides statistics should cater for harmonised risk indicators, which the Commission has to draw up under Article 15 of the Sustainable Use Directive (SUD)⁵, and should facilitate the calculation of risk indicators 'by using the statistical data collected'. The task of collecting the statistical data on pesticides cannot be seen as completely separate from the task of using these data for calculating

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Directive 2009/128/EC of the European Parliament and of the Council of 21 October 2009 establishing a framework for Community action to achieve the sustainable use of pesticides. (OJ L 309, 24.11.2009, p. 71)

risk. It would seem logical that the risk indicators should be known first, before any decision is taken on the data to be collected for this purpose. Further discussions are deemed necessary and Member States shall also be consulted in the SUD working group.

- Stakeholders suggest to adapt the legislation so that figures aggregated at a lower level can be released, as they could be needed for calculating risk indicators. The difficulty of collecting meaningful data on pesticides use from farmers, and the costs to Member States of doing so has been acknowledged as well as the difficulty to reach an EU-wide agreement on which crops are relevant as these can differ considerably between the different climatic zones in Europe.
- Pesticides are a cause of pollution and have a direct effect especially on the state of biodiversity, water bodies, and soils. To ensure that these impacts are addressed appropriately, it is essential that policymakers are able to quantify the risk and the level of pesticide pollution. This would also aid the better implementation of existing environmental policy tools and serve to identify the remaining policy gaps for addressing the environmental pressures caused by pesticides. Currently, the policies concerned by the data needs are the EU Biodiversity Strategy 2020, the common agricultural policy (CAP), the Water Framework Directive, and the Thematic Strategy on Soils.
- Pesticide statistics are too aggregated to effectively inform environmental risk assessment. A robust analysis of the impacts of pesticide application on ecosystems would require data on which specific active substances in pesticides are applied to which crops, as well as information on the types of ecosystems in which those crops are sited. Data on hazard, i.e. (eco)toxicological properties, is specific to active substances. Thus, the only way to effectively combine hazard data with data on exposure in order to understand risk is to have data on the application rates for specific active substances in pesticides by crop, area and ecosystem type. In addition, cumulative risk assessment methods, would need to be applied to provide an understanding of how the mixtures of active substances, safeners and synergists interact to generate combined effects in pesticides.
- The Regulation does not require information from the Member States on the type of ecosystem where substances are applied. The impact of mixtures of active substances on the ecosystem in which a crop is situated depends on the characteristics of that ecosystem, including both biotic and abiotic features. The 'mapping and assessment of ecosystems and their services' project⁶ provides an agreed typology of ecosystems. This typology could serve as a basis for Member States reporting on pesticides application by ecosystem type, and enrich our understanding of the risks of pesticides to the environment. A robust analysis of risks to the environment associated with pesticides is required to support the comparative assessment of candidates for

⁶ http://biodiversity.europa.eu/maes

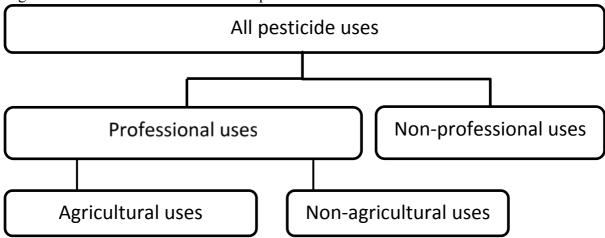
substitution as required under Article 50 of Regulation (EC) No 1107/2009 concerning the placing of plant protection products on the market. This is not possible with the data currently available.

- Should pesticides statistics become available at a sufficient level of detail, they could be extremely useful for conducting retrospective risk assessments of the actual levels of risk expected from the overall use of pesticides in the EU, for human and animal health, and the environment. This would allow the estimation of trends based on risk to complement those on sales. As each pesticide active substance has a different toxicity and likelihood for exposure, trends based on their risk to human and animal health and the different non-target organism groups could be highly valuable for supporting EU policies on public health, consumer protection, animal health and environmental protection. Such assessments would complement the annual assessments of the risk to consumers from the levels of pesticide residues monitored by the Member States.
- A balance between confidentiality and the relevance or usefulness of the data could be achieved by exploring different aggregation options, for example based on toxicity and use patterns. Consequently dialogue is suggested between the Commission's services, agencies, and other relevant actors to explore options that could help maximise the relevance and usefulness of the data in the future.

3.2. Studies on non-agricultural use of pesticides

Agriculture is the most obvious and probably the largest professional sector using pesticides. However, other professional or amateur users may also contribute more or less significantly to the total amount of pesticides used. A comparison of the quantities of pesticides used in agriculture with the overall amount placed on the market is envisaged in the quality report that will accompany the data on pesticide use in agriculture. The Regulation covers both annual statistics on the placing on the market of pesticides and statistics on agricultural use of pesticides. There is a lack of consistency between these two sets as there is no information on pesticides used for non-agricultural purposes. This was also noted in the negotiations preceding the approval of the Regulation, and so an indent was added in Section 6 (Quality reports) of Annex II of the Regulation: '– a summary description of the commercial non-agricultural uses of pesticides obtained in the framework of pilot studies to be led by the Commission'.

Figure 1. Overview of different uses of pesticides



In 2011 the Commission awarded grants for pilot studies to estimate both commercial and non-commercial non-agricultural use of pesticides. Five countries (Belgium, Italy, Lithuania, Latvia and Romania) applied for grants. In addition, the Commission is aware that such surveys have been carried out in the Netherlands and the United Kingdom.

The pilot surveys focused on sectors such as:

- landscaped areas or gardens, outdoor leisure areas, parks;
- sports, leisure areas and facilities;
- railways;
- highways and roads;
- airports and seaports;
- archaeological sites;
- kitchen garden growers /hobby farmers;
- state forests;
- gardens and parks;
- others.

The main lessons learned from earlier action and from the pilot studies are the following:

- 1. there is a huge diversity of patterns of non-agricultural uses of pesticides among the Member States or even between national regions;
- 2. predominant sectors of use can be identified and are common to most Member States;
- 3. a limited list of active substances is associated with the predominant uses;
- 4. the different sectors of use require different methods of data collection or a combination of methods.

Besides the apparent diversity of national or regional situations, certain major actors are common to all Member States and should be the basis for all surveys on the use of pesticides in the non-agricultural sectors. These are:

1. residential areas (including home & gardening);

- 2. public areas (including golf courses);
- 3. industrial areas;
- 4. infrastructure;
- 5. forests

These sectors of activity should be covered as a priority and should be the basis for comparing statistics on non-agricultural pesticide uses between Member States or regions.

3.3. Extending the scope of the Regulation

Recital (5) of the Regulation anticipates that the scope will be extended to cover biocidal products. In its report ⁷ on the sustainable use of biocides, the Commission has stated that it does not seem appropriate to simply extend the scope of the SUD to biocidal products. For that reason, the Commission also finds it unnecessary to extend the scope of the Regulation to biocidal products, even if this was the initial intention.

4. COST AND BURDEN

The costs and administrative burden of the surveys depend greatly on the survey method chosen.

The **pesticide sales statistics** rely in many Member States on the administrative data kept by the pesticide authorities or the authorisation holders (see Annex I). This means that the costs relate to contacting the authorities or the often quite limited number of authorisation holders to request the data, and then to processing it. While no actual numbers are available from all Member States, both the number of working days involved and actual costs are reported to be quite low in most cases. The costs and the burden to the reporting units are also reported to be quite reasonable, since the data required has to be recorded anyway as stipulated in Regulation (EC) No 1107/2009.

The **pesticide use statistics** require the information to be recorded at farm level, which leads to a higher burden. This means that a sample has to be set up, questionnaires prepared and interviewers or letters sent if an electronic collection system has not been developed. The total costs are heavily dependent on the method chosen, which can also be seen from the information transmitted to the Commission. No direct conclusions can be drawn from the reports on the costs involved as the information is not sufficiently detailed for this purpose.

As explained, the information in most countries comes directly from farmers. Under Regulation (EC) No 1107/2009, professional users (farmers or entrepreneurs) must keep accounts of their use of pesticides. This means that the information should be readily at hand when the farmer has to answer the interviewer or fill in the questionnaire. This is mirrored in

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(http://ec.europa.eu/health/biocides/docs/2016 report sustainableuse biocides en.pdf.)

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the quality reports, which in many cases show that limited time — from 15 minutes to about 2 hours per survey (every 5 years) — is needed on farms to complete the surveys.

5. EXPERIENCE FROM THE FIRST FIVE YEARS

Data on pesticide sales have been transmitted annually since December 2012 (2011 data). Despite some initial technical issues within the Commission, the processes are now mature and run well. The first data on the agricultural use of pesticides was transmitted to the Commission at the end of 2015. To this date, due to the very large volume of complex data, it has not been possible to fully process the data, which means it is not yet available to users. Consequently, no assessment of its usefulness has been made yet. Despite this, some observed weaknesses and recommendations are given below.

5.1. Availability of detailed pesticide data

The Regulation prohibits the disclosure of data on individual active substances. According to Article 3(4) .: 'For reasons of confidentiality, the Commission (Eurostat) shall aggregate the data before publication in accordance with the chemical classes or categories of products indicated in Annex III, taking due account of the protection of confidential data at the level of individual Member State. The confidential data shall be used by national authorities and by the Commission (Eurostat) exclusively for statistical purposes, in accordance with Article 20 of Regulation (EC) No 223/2009.'

Consequently, the Commission cannot publish data on individual active substances. In addition, the aggregated data cannot always be disseminated if there is a direct or indirect risk of statistical units being identified, this is the general rule in statistics to protect data privacy.

If the sales statistics would be collected from retail sellers, there would be a high number of statistical units, giving little cause for data confidentiality issues. However, it has become apparent that most Member States collect the data directly from authorisation holders. This is done either in the form of administrative data that have been transmitted to the pesticide authorities, or through a questionnaire. For most active substances, this means that there is only one data provider, which leads to the information being confidential. As there are many classes with only a few substances, or the producer/importer is the same for many of the substances in the group, this has led to a situation where a considerable amount of aggregated data at higher levels is also confidential. The Commission considers that the sales data legally required by the Regulation is being collected successfully and transmitted to the Commission by the countries. It also considers that the overall quality of the data is good. However, the application of the confidentiality rules to a substantial share of the data decreases the value of the statistical information provided to users. It therefore cannot be assumed that users' needs are being well served by the Regulation.

5.2. Pesticide sales statistics

Comparing sales of pesticides between countries and over years is not straightforward because external factors such as climatic conditions, soils and production methods can have a big impact on the types and volumes of pesticides needed.

Where a product is sold may not be where it is ultimately applied, and pesticides may also be sold directly to farmers by retail sellers in neighbouring countries. This may represent a small fraction of the total pesticides sales, but these quantities are not reflected correctly in the sales statistics. There can also be a delay between the sale of the pesticide and its use, depending on whether it is bought for stock or for direct use.

Many users would like to obtain detailed data on the volumes of individual active substances sold. However, neither the Commission nor the national statistics institutes can provide this information as they have to comply with the Regulation and the confidentiality rules.

The Regulation is, as described above, very restrictive in how the Commission may disseminate the data. All data has to be aggregated into classes and groups, regardless of whether or not the data is deemed confidential by the Member States. Moreover, the Commission cannot deviate from the classes established in Annex III to the Regulation.

As users are often interested in specific active substances or groups of substances that differ from the predefined classes, the Regulation could be seen as too restrictive; it does not allow the proper analyses to be carried out. A good example is the recent discussions on neonicotinoids, the group of pesticides that are potentially causing damage to bees. The active substances concerned are not all in the same chemical classes in Annex III, which means that the Commission has not been able to provide all relevant data to the policy makers.

The Regulation stipulates that the only unit to use is the weight but biological pesticides should not be expressed in weight but in 'colony forming units'. This creates problems both for the data providers and the users of the data, as the data provided makes no sense or have to be transformed before data transmission and use. This purely technical issue needs to be developed further.

5.3. Pesticide use statistics

The Regulation provides that for the statistics on agricultural use of pesticides, each Member State has to decide on a selection of crops to be covered during the five-year reference period that is representative of the crops cultivated in that Member State and of the substances used. The selection of crops has to include those most relevant for the national pesticide action plans. However, as national action plans do not always contain any reference to the most relevant crops, the choice of crops has been quite diverse. This has led to a situation where

there is a risk that it will not be possible to fully compare data on pesticide use on crops between countries.

The reference period has to be a maximum of 12 months covering all plant protection treatments associated directly or indirectly with the crop, during a five-year period. Member States may choose the reference period at any time of the five-year period and the choice can be made independently for each selected crop. This has led to a situation where countries have chosen different reference periods and thus it will potentially not be possible to compare data for the same year between countries, nor to give any EU-level results.

6. Proposals for further improvements

The Commission, taking into account the opinion of the relevant stakeholders, considers it important to further adapt the legislation on pesticides sales, so that all data that is not confidential can be made available to the public both as active substance, as well as in different forms of aggregation.

The Commission considers it equally important to adapt further the legislation on pesticides use statistics to ensure a more consistent approach and coverage across the Member States. This could include specified common reference periods and clear coverage requirements for the crops to be surveyed. The coverage rules could be based on the crop production statistics (a certain percentage of arable and permanent crops could be covered) and on analyses of the potential risks to the environment and human health, based on the sales of active substances. These rules would be set up in close collaboration between the relevant Commission's services and agencies and with national experts.

Finally, the Commission has, together with stakeholders, drafted a strategy for agricultural statistics for 2020 and beyond⁸. The strategy suggests that all agricultural statistics, except the Economic Accounts for Agriculture, should be grouped under two framework regulations. The Commission strongly recommends that pesticide statistics should be also merged with the other agricultural statistics domains.

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Strategy for agricultural statistics 2020 and beyond - Final.

 $\label{eq:Annex} \textbf{Annex} \ \textbf{I}$ The information presented in this Annex is based on the national quality reports provided by the countries according to the Regulation

| | RESPONSIBLE NATIONAL AUTHORITIES FOR PESTICIDES SALES | DATA COLLECTION METHODS FOR PESTICIDES SALES |
|----|---|---|
| BE | Federal Public Service of Health, Food Chain Safety and Environment | Administrative data; authorisation holders (producers, importers and exporters) are required to declare the amounts placed on the market |
| BG | Ministry of Agriculture and Food | Administrative data based on declarations by the authorised distributors |
| CZ | Czech Statistical Office | Administrative data; entrepreneurs who place products on the market or store them for export to third countries are obliged to report to the Central Institute for Supervising and Testing in Agriculture (CISTA). The data collection is done online and/or through paper questionnaires |
| DK | Danish Environmental Protection Agency, Ministry of Environment and Food of Denmark | Administrative data. Obligatory reporting by Danish authorisation holders electronically and foreign ones by email |
| DE | Federal Office of Consumer Protection and Food Safety (BVL) | Administrative data; authorisation holders (including holders of parallel trade permits), manufacturers and distributors are required to report the amounts sold nationally or exported, including sales for emergency situations |
| EE | Statistics Estonia | Census survey of all importers and suppliers by web application and/or through paper-based postal survey |
| IE | Department of Agriculture, Food and the Marine | The data is collected on a census basis. The administrative data is sourced from all the product authorisation holders and marketing companies |
| EL | Hellenic Statistical Authority (ELSTAT) | Statistical survey of all sellers within the national territory conducted by the Ministry of Rural Development and Food, by letter or email. Since 2014 sellers have been obliged to record the data online |
| ES | Ministry of Agriculture, Food and Environment | Electronic questionnaire/survey (within and outside the national territory) of authorised holders and respondents to whom the commercialisation rights have been transferred. Administrative data is provided by S.G. Sanidad Vegetal |

| | RESPONSIBLE NATIONAL AUTHORITIES FOR PESTICIDES SALES | DATA COLLECTION METHODS FOR PESTICIDES SALES |
|----|--|--|
| FR | Ministry of Agriculture, Food and Forestry | Administrative data; distributors are obliged to declare sales to the water agencies. The sales figures are then further processed by the Ministry of the Environment |
| HR | Croatian Bureau of Statistics | Administrative data; the Ministry of Agriculture is responsible for collecting data from distributors and sales points |
| IT | Italian National Institute of Statistics (ISTAT) | Postal census survey of all distributors |
| CY | Statistical Service of Cyprus (CYSTAT) | Postal or electronic questionnaire/survey of suppliers. Administrative data is provided by the Ministry of Agriculture |
| LV | State Plant Protection Service of Latvia (SPPS) | Full survey (paper and/or electronic) of all respondents — distributors |
| LT | Statistics Lithuania | Full survey of all producers and authorisation holders |
| LU | Institut National de la Statistique et des Etudes Economiques (STATEC) | Census of vendors (retailers or wholesalers) and cooperatives |
| HU | Hungarian Central Statistical Office | The National Food Chain Safety Office (Ministry of Rural Development) collects the data from authorisation holders |
| MT | National Statistics Office (NSO) | Online census survey of authorised importers |
| NL | Statistics Netherlands | Administrative data obtained from the Plant Protection Office (NVWA) |
| AT | Statistics Austria (STAT), Austrian Agency for Health and Food Safety (AGES) | Authorisation; approval holders and distributors are obliged to report data to the Austrian Federal Office for Food Safety |
| PL | Central Statistical Office | Full-scale survey conducted in cooperation with the Ministry of Agriculture and Rural Development and with the Institute of Plant Protection — National Research Institute |
| PT | Statistics Portugal (INE), National Authority (DGAV) | Administrative data is obtained from the National Authority Direção Geral de Alimentação e Veterinária (DGAV) |

| | RESPONSIBLE NATIONAL AUTHORITIES FOR PESTICIDES SALES | DATA COLLECTION METHODS FOR PESTICIDES SALES |
|----|---|---|
| RO | National Institute of Statistics | A census survey based on face-to-face interviews, conducted in cooperation with the Ministry of Agriculture and Rural Development (National Plant Protection Agency). It covers certified selling units, economic operators and natural persons |
| SI | Statistical Office of the Republic of Slovenia | Administrative data reported to the Administration of the Republic of Slovenia for Food Safety, Veterinary Medicine and Plant Protection (UVHVVR) |
| SK | Statistical Office of the Slovak Republic (SOSR) | Administrative data; the Central Controlling and Testing Institute in Agriculture (CCTIA) collects data from authorisation holders or parallel trade permit holders |
| FI | Finnish Safety and Chemicals Agency (Tukes) | The Finnish Safety and Chemicals Agency (Tukes) collects data by mail or email from authorisation holders or their representatives |
| SE | Swedish Chemicals Agency (Keml) | The agency gathers data from authorisation holders |
| UK | Chemicals Regulation Directorate | Voluntary, electronic census of businesses conducted by the British Crop Production Council on behalf of the Office for National Statistics (ONS) |
| NO | Norwegian Food Safety Authority | Administrative data from importers and producers |

ANNEX IIThe information presented in this Annex is based on the national quality reports provided by the countries according to the Regulation

| QUALITY OF PESTICIDES SALES DATA TRANSMITTED | USEFULNESS OF PESTICIDES SALES STATISTICS |
|--|--|
| No estimates are required and overestimates are rather unlikely due to the association between declared data and fees | The data is used to calculate the annual fee for placing pesticides on the market and to estimate the overall quantities used at national level and the subsequent risks for man and the environment |
| The data is comprehensive and covers all available exports and imports | The data is specific, with only a few potential users |
| The sources cover all units legally obliged to report and all products placed on the market | The data is used mainly by CISTA for phytosanitary control purposes, planning and carrying out checks on distributors' compliance |
| The amount of sales is reported as the total amount of the sale of each product | Users are politicians, agriculture, NGOs and the public. Uses of the data include monitoring the target of reducing the pesticide load by 40 % by the end of 2015 compared with 2011 (Danish Pesticide strategy 2013-2015, now prolonged by 1 year) |
| The overall accuracy of the data is considered satisfactory, although non-response mainly due to incorrect contact details of parallel trade companies could be a problem. Under-coverage due to illegal trade cannot be estimated | The Federal Office of Consumer Protection and Food Safety (BVL) uses the data for internal post-registration monitoring tasks. Data is also published in the German Statistical Yearbook on Food, Agriculture and Forestry and in the Federal Gazette ('Bundesanzeiger'). The Julius Kühn Institut (JKI), the Federal Research Centre for Cultivated Plants, also receives this data. Other authorities, e.g. the Federal Environmental Agency (UBA) or research institutions, are provided with substance-specific sales data on request |
| The quality of the statistics is quite high because all sales companies are covered and the response rate was high | Users include the Agricultural Board, the Agricultural Research Centre, the Ministry of Agriculture, other ministries, research and education institutions, the media, other organisations and companies, and private individuals |
| | No estimates are required and overestimates are rather unlikely due to the association between declared data and fees The data is comprehensive and covers all available exports and imports The sources cover all units legally obliged to report and all products placed on the market The amount of sales is reported as the total amount of the sale of each product The overall accuracy of the data is considered satisfactory, although non-response mainly due to incorrect contact details of parallel trade companies could be a problem. Under-coverage due to illegal trade cannot be estimated The quality of the statistics is quite high because all sales companies are covered and |

| | QUALITY OF PESTICIDES SALES DATA TRANSMITTED | USEFULNESS OF PESTICIDES SALES STATISTICS |
|----|---|---|
| IE | Data returned from the product authorisation holders and marketing companies is the actual real figure involved. Consequently the quality of the data is considered to be high | Only a few requests for this data have ever been received. Companies and authorisation holders have access to this register and can view information for each product |
| EL | The implementation of the online system has improved the overall quality. In particular it has raised the response rates from the low levels seen in the past | The Ministry of Rural Development and Food, the government, the press, the media and academic researchers use this data to reduce the risks associated with pesticides |
| ES | The data is subjected to an internal consistency process | To assess the impact of public policies and calculate relevant health indicators and associated environmental risks |
| FR | The declaration system covers sales to endusers (or purchases abroad by end-users). This prevents double counting linked to authorisation transfers or intermediaries in the sale chain | We are not currently aware of any specific user needs |
| HR | no information provided by the country | Data users are state bodies, local governments and legal and natural persons |
| IT | Quite satisfactory | Data is mainly used by the Institute for Environmental Protection and Research (ISPRA) and the Ministry of Agriculture to assess risks to man and the environment |
| CY | The survey was exhaustive with full coverage as there were only a few suppliers in the country | The data meets the needs of the Ministry of Agriculture |
| LV | The overall quality of the statistical output is assessed as good. The main strength of the process is that the data collection is based on legislation | Mostly scientists, students and the media have shown interest in the data. The statistical information superficially satisfies national user needs |
| LT | The data is collected from reliable sources applying high methodological standards | The main users are state and municipal authorities and agencies, international organisations, the media, research and business communities and students. The data is used to identify potential risks to human health and the environment |

| | QUALITY OF PESTICIDES SALES DATA TRANSMITTED | USEFULNESS OF PESTICIDES SALES STATISTICS |
|----|--|--|
| LU | Respondents are also invited to indicate the shares of domestic and foreign suppliers or intermediaries in order to eliminate potential double counting between national wholesalers | Sales statistics might be of interest to policy makers, the Ministry of Agriculture, the Ministry of Environment, environmental lobby groups and the research community |
| ни | Marketed quantities are compared to and cross-checked with data from previous years at product level | no information provided by the country |
| МТ | The overall quality is good. The data collection is exhaustive and detailed processes are in place to validate and analyse the data | The European Commission is the main user |
| NL | The quality of the data is routinely reviewed using a framework that is based on the European Statistical System definition of quality | The data is used to evaluate government policy |
| AT | no information provided by the country | Supervision and control |
| PL | Obligatory survey of producers, national distributors and importers through electronic questionnaires | Data users include central offices, scientific and research institutes, students and companies operating in the agricultural sector. The data may be used to assess the conditions and costs of agricultural production and the environmental impact |
| PT | Validations are based on comparisons of aggregated data with previous years | The data is used to evaluate the market and its connection with sales authorisations by the national authority |
| RO | no information provided by the country | Users include the Ministry of Agriculture and Rural Development, the National Plant Protection Agency, the Plant Protection Units, the Academy of Agricultural and Forestry Sciences, the National Institute Research and Development for Industrial Ecology, the Centre of Applied Biochemistry and Biotechnology, the Ministry of Environment, Waters and Forest, and the Institute of Research and Development for Plant Protection |

| | QUALITY OF PESTICIDES SALES DATA TRANSMITTED | USEFULNESS OF PESTICIDES SALES STATISTICS |
|----|--|--|
| SI | The data covers wholesalers within the national territory. However, the data cannot be disaggregated to lower territorial units as it does not allow any conclusions to be drawn on where the retail and actual use occurs | Used as a proxy for the amounts of active substances used in agriculture |
| SK | The data is of good quality with sufficient accuracy and completeness | The European Commission is the main user |
| FI | The quality of the data can be considered good | Users of the data are agricultural, environmental, food safety and health authorities, research institutes, and the media. Detailed data has been submitted on request for research and monitoring purposes |
| SE | The data covers all products placed on the market. The data is processed manually and therefore there may be calculation errors | We have very little information on users. Trends are often more interesting than the data itself |
| ик | The qualitative measure of accuracy is deemed acceptable. A multinational estimated to have approximately 8 % share of the UK market by volume is reported to have consistently refused to supply data. Other missing responses were not considered to be significant as most non-responders are among the smaller players in the market | Potential national users may include members of the Crop Protection Association. This is the UK trade association of companies engaged in the manufacture, formulation, development and national distribution of pesticides and crop protection products for agriculture, forestry, horticulture, home gardening, industrial and local authority outlets |
| NO | The data quality is considered very good. All imports and production have to be reported and confirmed by the companies' accountants. Data estimates are not required | The data is used as a basis for calculating the environmental tax. Users include government bodies, farmers associations, NGOs, industry etc. The data is available for both active substances and products. Users' comments indicate a need for data at regional level, not only national level. However, this is not feasible due to the way the data is collected |