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ISSUE DATE 25/04/2019

Rev. O
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1. EXECUTIVE SUMMARY

1.1. Introduction and overview


The NAP, which is required to undergo review at least every five years, describes how the measures pursuant to the obligations of the transposed Directive are to be implemented to support the sustainable use of pesticides in Malta. The NAP lists objectives and measures to reduce risks and impacts of pesticide use on human health and the environment whilst encouraging the development and introduction of integrated pest management and alternative techniques to reduce the dependency on the use of pesticides.

The proposed reviewed NAP for the sustainable use of pesticides covering the period 2019-2023, expands on the framework of the former NAP to improve the previously set objectives and measures to achieve a better outcome. It takes account of the social, economic and environmental impacts of the previous actions, in addition to the health of the public, with the main aim to generate an efficient tool to support the sustainable use of pesticides in Malta.

The reviewed NAP consists of 6 main area objectives:

(a) Training, Information and Awareness-raising
(b) Controls on Pesticide Application Equipment
(c) Controls on Handling, Storage and Disposal of Plant Protection Products
(d) Controls on the use of Plant Protection Products in Specified Areas
(e) Integrated Pest Management and alternate low pesticide input pest management strategies
(f) Risk Indicators and Data Gathering

1.2. The public consultation dates

The reviewed Malta’s National Action Plan for the Sustainable use of pesticides covering the period 2019-2023 was published for public consultation on the 25th of February. Contributions and feedback were sought regarding the content of the Plan for each of the main area objectives defined by the Plan.

1.3. Views sought during the consultation

Contributions and feedback were sought regarding the content of the Plan detailing the proposed specific objectives and measures outlined for each of the main area objectives defined by the Plan.
2. RESPONSES TO THE CONSULTATION AND PROCESS USED TO SEEK STAKEHOLDER VIEWS

2.1. The closing date of the public consultation, methods used to receive the feedback, total amount of responses, and from whom feedback was received.

The public consultation closed on the 24th of March. The consultation document and the reply form were made available online and responses were accepted electronically and on paper. In total, there were 6 responses. These were received from across the industries, including Non-Governmental Organisations, and the general public.

2.2. Meetings held with stakeholders in relation to the consultation

Two information sessions organised in conjunction with MEUSEC were held during the consultation period. These two information sessions have also contributed to the collection of feedback which was noted and evaluated.

3. SUMMARY OF RESPONSE AND DECISIONS

3.1. Statistics

The following is summary of the consultation responses received. We would like to thank all those who took the time to respond to the consultation and participate in stakeholder meetings around the consultation exercise.

- Total feedback received: 6
- Total feedback received by individuals: 4
- Total feedback received by organisations: 2
- Total feedback received through email: 4
- Total feedback received through online form\(^1\): 2
- Total feedback received by post: 0

3.2. Summary of the feedback received

Overall the feedback received was positive and constructive supporting the Plan. The major remarks, recommendations and concerns expressed can be summarised under the collective headings as follows:

*Education/Training, Information and Awareness-raising*

\(^1\) Online form on www.konsultazzjoni.gov.mt redirected to MCCAA
Positive feedback was expressed towards the reviewing process adopted for the drafting of the reviewed plan and towards the identification of training, information and awareness-raising to all stakeholders as a main area objective of the plan, placing the stakeholders as 'allies' in the overall vision for the implementation of the National Action Plan.

The structured plan was considered as a positive resource which, supplemented by its actuation, should yield a positive risk reduction. It was remarked that education and training to all applicable stakeholders is a fundamental requirement for the implementation of the Plan.

It was also remarked that more emphasis may be placed on the approaches which target a higher number of stakeholders to allow a higher percentage of farmer outreach during the awareness-raising activities. It was also suggested that liaison with all stakeholders including the general public, should be strengthened in view of discussion of emerging issues and availability of guidance material.

The availability of ecological and organic principles was suggested with reference to specific training to the stakeholders concerned with governmental and private garden management to further reduce risks to the general public.

Controls on the handling, storage and disposal of plant protection products (PPPs)

Concerns were expressed over the conduct of controls on the certification of professional users in view of plant protection product handling in the various sectors which make use of such products and at points of sale. Recommendations were put forward to support enforcement in general, including random unannounced spot checks, as a means to reaching the effectiveness of the National Action Plan for the sustainable use of pesticides.

Concern was also expressed regarding the procedural steps related to risk assessment as part of the handling procedure governing good practice throughout the use of PPPs and the inclusion of such activities in the training requirements in fulfilment for certification as professional users of plant protection products (PPPs).

Regarding the listing of personal protective equipment requirements, it was suggested to reference face masks and filter changing requirement indication in sections addressing personal protective equipment. This is considered as a positive initiative to support reference to all personal protective equipment (PPE) items to protect the health of the professional user.

Concern and disagreement were also expressed over the possibility for residents to request access to PPP records through a request put forward to the competent authority, the MCCAA.

The reference to minimum distances between storage facilities for PPPs and water features was also noted and concerns expressed over the weighing of such distances on current logistics at the farmer’s end. A suggestion was put forward to consider that it may not always be possible to eliminate pesticide application in fields along roads.
Concerns were also stated over the content of instructions for use presented on labelling of plant protection products and the difficulties in identifying pests and, hence, the correct strategy to be applied. It was remarked that in view of difficulties in the interpretation of instructions on labels, professional users should have support available, particularly in view of risk reduction and preventing the development of resistance. It was also suggested to enhance the available resources to further support the farming sector during product selection relative to pests and crops. Recommendations were also stated over the availability of qualified personnel at the point of sale to further support the farming sector.

Concerns were highlighted for the fact that the local sector lacks the availability of timely laboratory testing services covering pesticide residue analysis which may support the agricultural sector and improve the general public perception.

Low pesticide-input pest management and alternate strategies to pesticide use

Concerns were expressed over the use of glyphosate-based products and organophosphate products particularly in public spaces. It was suggested that organic alternatives are used in public spaces and, if such products, and herbicides in general may be prohibited in public places.

It was also suggested that more alternatives such as botanical, biological and organic products and other non-chemical substitutes are available and addressed, and ways to dissuade the use of pesticides which are not categorised as organic are considered. Soil sterilisation was also suggested as an alternative technique to the use of pesticides.

Additionally, it was suggested that increased awareness and incentives are adopted to promote alternative strategies such as organic farming and enhance the current statistics. The suggestion also included the availability of support at farmer level through the competent authorities, to implement organic farming practices and support an increased turnover. Increased awareness and incentives on organic farming at the general public’s point of view may also support an increase in demand for organic products and hence improve current statistics. It was thus recommended to support more awareness raising at the general public level in addition to stakeholders involved in the farming sector.

Clarifications

Clarification was sought over the characterisations of ready to use formulations, non-professional users and presentation of documentation relating to professional user certification for purchasing of plant protection products.

Clarifications were also sought over contact point(s) for the referral of erroneous activities involving pesticides.
3.3. The assessment of the feedback received

The feedback received was duly evaluated and applicable recommendations falling within the remit and the identified objectives of the Plan as laid down in the Sustainable Use of Pesticides Regulations, were integrated within the reviewed plan.

*Education/Training, Information and Awareness-raising*

The positive remarks in relation to the identification of training, information and awareness-raising to all stakeholders as a main area objective of the Plan which strives to place the stakeholders as key contributors to the implementation of the Plan were acknowledged.

The additional remarks and suggestions were also noted. The NAP strives to strengthen the ongoing liaison with all applicable entities and the wide range of stakeholders to reach the objectives identified. It is highlighted that the NAP strives to liaise with entities, in particular those providing advisory services to farmers to support the prioritisation of guidance material development or revision and the identification of additional concerns requiring the development of such resources. The NAP further outlines collaboration and consultation with applicable Government entities and organisations representing professional users, amongst others, to identify and assess evolving issues for the development of supporting guidance/resource material in support of the applicable stakeholders.

*Controls on the handling, storage and disposal of plant protection products (PPPs)*

The concerns expressed over the conduct of controls were noted. It is highlighted that the reviewed plan identifies compliance in the respective sectors as one of indicators of progress towards the implementation of the Plan and thus the effectiveness of the Plan. The areas identified are encompassed within the reviewed Plan.

Risk assessment procedures are a requisite of the training requirements in fulfilment for certification as a professional user. These training requirements ensure that professional users acquire sufficient knowledge regarding hazards and risks related to plant protection product use to humans and non-target organisms, and the environment in general, and also to ensure that the most appropriate decisions on products are taken such that approaches with the least side effects on human health, non-target organisms and the environment for a given pest problem are selected.

It is highlighted that as stated in Annex III point 1, personal protective equipment (PPE) type and specific controls which must be used when handling or applying the selected PPP are provided on the product label. Point 3 within the same Annex makes reference to all situations, even when the product label may not refer to particular PPE items, where it is good practice to wear basic PPE such as coveralls, suitable protective gloves and boots at all times when handling and applying pesticides. The reference to face masks as components of PPE was taken into account and incorporated in Annex III.

In relation to the remarks concerning the availability of records related to PPP use to third parties, it is highlighted that such information may only be made available to third
parties such as the drinking water industry, retailers or residents, upon justified requests made in writing to MCCAA. The MCCAA, in turn will provide access to such information in accordance with applicable national or Community law. These details are in line with reference to Article 67 of Reg 1107/2009.

It is highlighted that unless otherwise stated on the label of the plant protection product as cited within text of the plan, the minimum distances from water features are recommended when storing plant protection products. In Section 6.3 of the reviewed plan it is also emphasised that storage of PPPs should follow the principles outlined in the Maltese Code of Good Agricultural Practice and Good Plant Protection Practice. The suggestion for consideration that it may not always be possible to eliminate pesticide application in fields along roads was taken into account with reference to reducing as far as possible or the elimination of application of pesticide application along such structures as per current Sustainable Use of Pesticides Regulations. The reviewed plan also includes reference to the availability of advisors acknowledged by the MCCAA to further support farmers on the identified remarks.

The feedback regarding pest identification and product label interpretation was noted. It is highlighted that the reviewed plan addresses the availability of MCCAA acknowledged advisors and advisory services which target the support to farmers regarding methods available to control pests and applicable technical advice. It is reiterated that the NAP strives to liaise with entities, in particular those providing advisory services to farmers, to support the prioritisation of guidance material development or revision and the identification of additional concerns requiring the development of such material.

With reference to the availability of qualified personnel at the point of sale, it is highlighted that the reviewed plan supports the availability of a sufficient number of adequately trained staff at the point of sale to provide safety instructions to manage the risks for the product in question.

*Low pesticide-input pest management and alternate strategies to pesticide use*

The feedback expressed over the use of glyphosate-based products and organophosphate products, particularly in public spaces, was noted. It is highlighted that Malta has banned the dangerous co-formulant POE-tallowamine from glyphosate-based products and is currently awaiting the publishing of a legal notice which prohibits the use of herbicides in areas used by the general public or by vulnerable groups as defined in Article 3 of Regulation (EC) No 1107/2009 as implemented by the Plant Protection Products (Implementation) Regulations.

The feedback expressed over the reference to and awareness-raising of alternative strategies to pesticide use and other techniques which make use of low pesticide-input pest management strategies was noted and it is highlighted that the main objective of the reviewed plan is the promotion of low pesticide-input pest management, giving wherever possible, priority to non-chemical methods so that professional users of pesticides switch to such practices and products with the lowest risk to human health.
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and the environment among those available for the same pest problem. Low pesticide-input pest management are inclusive of Integrated Pest Management techniques as well as organic farming. In addition, the reviewed plan addresses the availability of MCCAA-acknowledged advisors and advisory services which further support farmers regarding methods available to control pests. The Plan also strives to promote available incentives for agricultural producers applying general and/or specific principles of integrated pest management through collaboration with respective entities and to encourage the use of non-chemical alternatives to pesticides wherever possible.

Clarifications
These clarifications were addressed accordingly during the information session delivered.

4. IMPLEMENTATION

4.1. The implementation of the decisions
Following the evaluation and the applicable integration of the feedback received as outlined above, the final reviewed Plan for the sustainable use of pesticides for Malta covering the period 2019-2023 was cleared and submitted to the Commission.

5. CONTACT DETAILS
For any questions regarding this response, kindly contact:
consultations.mccaa@mccaa.org.mt

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