

SUMMARY REPORT

February 2018

SME survey for the study supporting the REFIT evaluation of the EU legislation on plant protection products and pesticide residues

Introduction

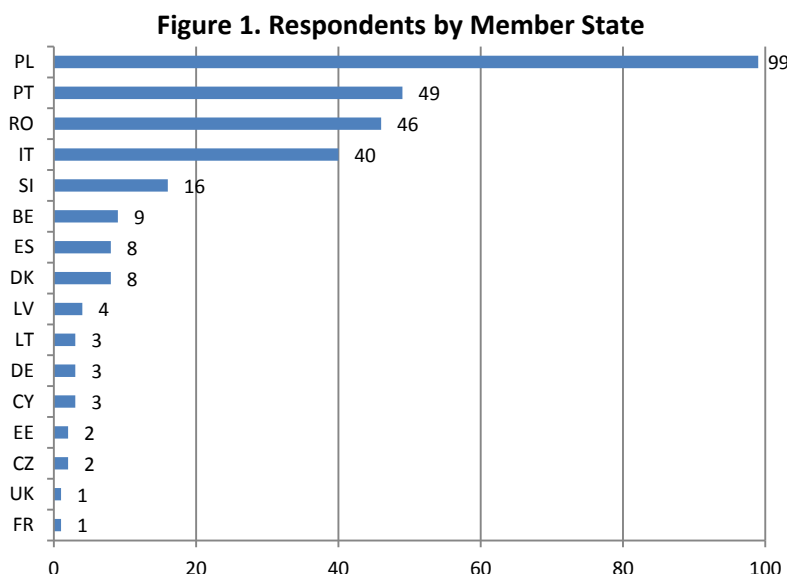
The SME survey was launched on 14 November and closed on 15 January 2018. The overall number of responses submitted was 296. A scan for duplicates yielded two cases, resulting in 294 responses that will be subject to analysis.

The SME survey aimed to collect the views of micro, small and medium-sized enterprises (SMEs) on the EU legislation on pesticides (Regulation (EC) No 1107/2009) and pesticides residues (Regulation (EC) No 396/2005). In particular, it sought to gather information on how the existing rules governing the approval of active substances, authorisation of pesticides and the setting of maximum residue levels of pesticides are working. The survey focussed particularly on administrative burden and costs. The results of the consultation are important to identify the impacts of the existing rules on SMEs and will be used to assess to which extent the existing rules are fit for purpose.

The Europe Enterprise Network was used to collect contributions. The survey was translated into all EU languages. EEN regional partners encoded all answers in English into the EU survey.

Who contributed?

The majority of the 294 respondents originate from four Member States - Poland, Portugal, Romania and Italy (see Figure 1).



This document should be regarded solely as a summary of the contributions made by stakeholders in the survey for micro, small and medium-sized enterprises (SMEs) on the REFIT evaluation of the EU legislation on plant protection products and pesticide residues. It cannot in any circumstances be regarded as the official position of the Commission or its services.

Whom are they representing?

Most of the respondents (109) represent SMEs involved in agricultural business (see figure 2). 50 respondents are processors of food and feed. In the category "other" SMEs have classified their businesses as consultants, importers of seeds, scientific work and research, and breeders just to name a few. Most of the respondents (210) are micro-enterprises with a turnover of less than 2 million EUR from the last year available (see figure 3).

Figure 2. How would you classify your business?

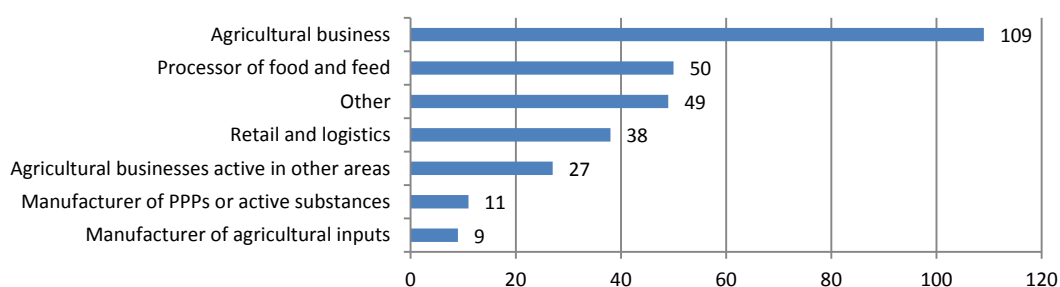
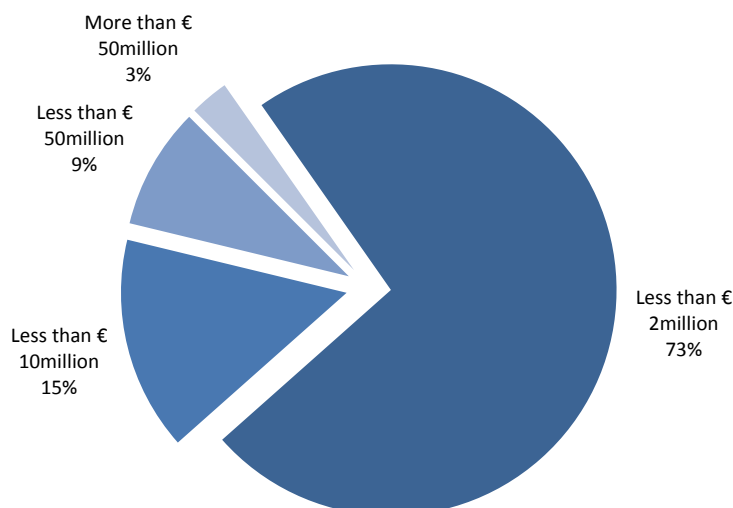


Figure 3. Turnover from the last year available



What aspects are addressed?

The main aspect addressed in the survey was the administrative burden and costs of the two Regulations for SMEs. This is covered by several questions, for instance if the businesses have difficulties complying with the Regulations, or if they need to hire external consultants to advise or help them complying with the Regulations. Respondents were also asked to estimate the share of administrative costs stemming from the Regulation on pesticides as a percentage of all administrative costs for their business.

Regarding the MRL Regulation, SMEs were asked if they think the procedures are clearly defined, too burdensome, flexible, cost efficient and sufficiently adapted to technical and scientific progress. For the pesticide Regulation, SMEs were asked how they think the system to approve active substances and authorise pesticides is working.

What are their views and concerns?

When asked about the impacts of the MRL and Pesticide Regulations on their profits, competitiveness, level of production and volume of sales compared to the situation before the Regulations entered into force, a majority of respondents indicated no impacts on all these variables.

The respondents are mainly concerned about the complexity of the rules and the administrative burden, especially considering their relatively small size. When asked if their needs are sufficiently taken into consideration, half of the respondents are satisfied with the Regulations and half of the respondents are dissatisfied (see figure 4).

The majority of the respondents report that the share of administrative costs from the pesticide Regulation is below 5% of all administrative costs for their business. 30 respondents report that the share of administrative costs for pesticides is more than 10% of all administrative costs (see Figure 5).

Figure 4. Are the specific needs of your business sufficiently taken into consideration in the Regulations?

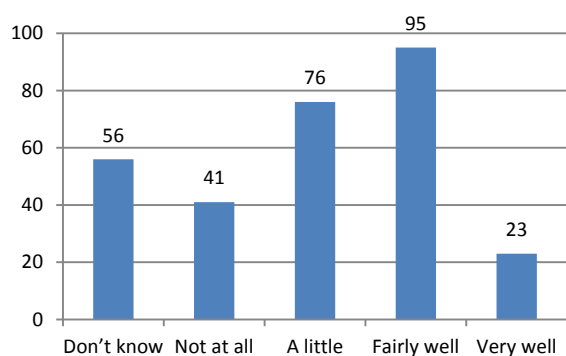
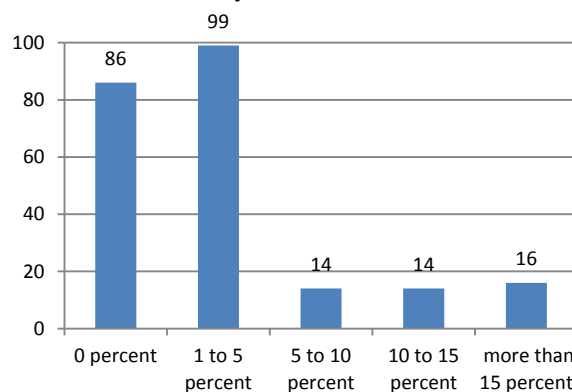


Figure 5. What is the share of administrative costs stemming as a percentage of all administrative costs for your business?



The evaluation process

The Better Regulation agenda is one of the main priorities of the European Commission. Part of this is the Regulatory Fitness and Performance Programme, known as REFIT, which includes both fitness checks and evaluations. REFIT is a rolling programme to keep the entire stock of EU legislation under review and ensure that it is 'fit for purpose'; that regulatory burdens are minimised and that all simplification options are identified and applied.

The SME survey is one part of the data collection for an external study commissioned by DG Health and Food Safety in order to collect evidence for supporting the REFIT evaluation of the EU legislation on plant protection products and pesticide residues. Stakeholders and the public are consulted extensively. In addition to the SME survey, other consultations were launched simultaneously in November 2017: one open public consultation addressed to citizens, one survey to Member State Competent Authorities and one survey addressed to stakeholders such as business associations, non-governmental organisations, international organisations and third countries.

The external study is expected to be finalised in the summer of 2018. The Commission will then draft a staff working document and the evaluation report is expected to be sent to the European Parliament and the European Council during the first half of 2019.