

*"The new EU Legal Framework on Pesticide Use:  
National implementation and participation of the Civil Society in  
Central-Eastern EU" 29 - 30 June , Budapest*



# The process of Identifying the Key Elements and Objectives in Bulgarian Action Plan

Valentina Lukova

# BULGARIAN NAP



- Not any
- Idea at the beginning - A set of main points we tried to create
- Most likely the result will be - a set of groups of questions to laid on the table

*Stages of our work:*

*Investigation sources for  
developing of a principal proposal  
for NAP in Bulgaria*

Existing national legislation  
which potentially could be  
integrated in a future NAP.

*Stages of our work:*

# *Investigation of the Worldwide experience*



- Danish Pesticide Use Reduction Programme,
- DEFRA's Strategy for the Sustainable Use of Plant Protection Products,
- Sustainable Development Action Plan UK,
- The International Code of Conduct on the Distribution and Use of Pesticides,
- USAID/AFR guidance: Preparing PERSUAPs for pesticide programs in Africa,
- Australia experience.
- NAP on Sustainable Use of Plant protection products Germany,
- Norwegian plans,
- Netherland plans , etc.

*Stages of our work:*

## *Current national legal requirements*

- SWOT analysis
- Grouping of aims with other legislative acts
- Set of Recommendations for the main legal instruments

*Results of our work :*

*Structure of the BG NAP - questions to be discussed with stakeholders*

- Several NAPs (and if - which ones to be - envi, agri, health, etc.)?
- Several NAPs by regions (e.g. mountains - strict organic, special regions (NATURA) , possible Ranking?
- Several NAPs by group of crops (horticulture, grain, amenity, etc.)

*Results of our work:*

## *Do we need New structures?*

### **Health & Safety Regional Independent Supervisors:**

- **Supervision and reporting of bad practice and incidents, incl in citizens areas (Incident Reporting & Investigation take actions to make sure that a similar or more serious incident will not happen again)**
- **Participating in update of regional NAPs**
- **Food Safety directorate with CSO representatives**

*Results of our work:*

*Do we need the new items?*

- Occupational Health and Safety legislative instrument
- Exposure Control Plan to Employees, etc.



*Results of our work:*

## *Goal and Possible Aims?*

- Reduce the risk (env, health or??? verse vera?) Reduce the residue OR reduce the risks (it is not equal !)
- Reduce the quantities?
- Drastically to change the approach in BG Agri
- Totally to reject the use of instruct dangerous pesticides, etc.

*Results of our work:*

## *Possible Measures - positive , negative and committed*

- For Farmers
- For producers/importers
- For amenity users
- For relevant hosts (schools, municipalities - supervisors needed ,public (hoseholders)

**BUT FIRST -**

- For Decision makers (capacities)- the first stage
- For Competent Authorities (education of educators)they are still dependent of pesticides

*Results of our work:*

## *A set of possible Indicators*

- Annual Amounts - statistic (incl. by regions)
- Environment load indicators (TFI, Free Areas, etc.)
- Risk Indicators (Health Indicators, Residue, etc.)
- Knowledge indicators (for operators- risks, alternatives, for society- awareness)
- Volunerable groups-connected indicators

*Most of them are not applicable in the near future*

# *Possible Health Indicators?*

- Prevalence of asthma, allergies, EDD, etc. in children
- Infant mortality
- Exposure of children to pesticides (Incl. Biocides)
- Children/population living in pesticides contaminated areas
- Proportion of citizens living in organic agri areas, etc.

*The problems we still could not  
solved:*

- **Implementation** - the ever stumble point in BG plans and strategies - how to ensure
- **Stakeholders involvement**
- **Review and Update of the Plan**

# *The problems we still have not solved:*

- Measures for Citizens commitment to safety
- Proposal for Effective financial instruments to address all aspects along the lifeline of pesticides from production, via trade, advertising and use, to the disposal of pesticides
- Measures for information exchange, still missing

*Our Benefits:*

*A lot of:*

- **New information**
- **New capacity**
- **New contacts**
- **New vision among authorities**

Our Benefit:  
Clarifying (in some degree) the CSO  
approach and area of future work

Influence the policy, BUT not forget to influence  
the society

- To create public attitude of rejecting the idea of buying contaminated with pesticides food ( it will change the farmers approach- they have always in mind potential sales of their products)
- The same for envi rsk
- Influence the other stakeholders (even industry!)
- Need expertise for our future work



*Consultations with key stakeholders on main targets in NAP:*



Health, biodiversity, environment, women and children protection, friendly business (food, water, tourisms, etc.), farmers, retailers, authorities, government, etc.

*Thank you for your attention!*



Valentina Lukova  
Email [val\\_lukova@abv.bg](mailto:val_lukova@abv.bg)