

| Section | Paragraph | Message Id | Message | Country/ Organism. | Date | Action to take | Notes |
|-------------------|-----------------------|------------|---|--------------------|------------|----------------|---|
| Executive summary | A stable and reliable | 171742 | "maintaining or enhancing crop yields and protecting quality in both conventional and organic arable farming" | SANTE | 16.03.2020 | Address | edited text |
| Executive summary | A stable and reliable | 186080 | stable food supply is also partly caused by imports of food into the EU. Maybe good to be more precise when talkign about pesticides. The PPP legislation in the EU also covers microorgsnisms (wider scope than chemical pesticides), but the report concerns chemical pesticides. | SANTE | 16.03.2020 | Acknowledge | |
| Executive summary | A stable and reliable | 442296 | Suggest to also mention organic farming for completeness. "However, they can also lead to harmful effects in the envrionment..." Investigation of possible adverse side effects on non-target organisms and the environment are part of the approval process of pesticides. In case a pesticide is not safe for the environment, it will not be approved. Therefore, this statement is misleading and biased. Although the report is meant to assess pesticide effects in particular it would be good to also mention the risk of chemicals of various origins to set the right context. | ECPA | 16.03.2020 | Acknowledge | It is obviously that even though pesticides are approved, they can have harmful effects (e.g. death of insects) |
| Executive summary | This technical rep | 986540 | For groundwater, the "affection" is only related to the concentration exceedance of the drinking water limit of 0.1 µg/L | EFSA | 16.03.2020 | Acknowledge | |

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| Executive summary | This technical rep | 406069 | In our opinion this approach is scientifically incorrect. It suggests that everything but the lowest EQS is not safe enough and only the lowest EQS is correct. It therefore undermines the authority of those institutions in member states that have set a higher EQS. Furthermore this approach potentially generates misleading information as it will result in higher EQS exceedances than reported on the national level. EQS exceedances should be calculated by considering the respective national EQS values. It should be made clear what "affected" means in this context. Does it mean EQS exceedance? Does it mean exceedance of 0,1 µg/L for groundwater? Or does it mean "detected"? | ECPA | 22.03.2020 | Acknowledge | This is a first step to develop a European overview of pesticide situation. Therefore, we have to develop a pragmatic method to show whole picture. We are aware of your comment and include in several sections explanations on data uncertainties as well as the necessity to further develop this first step. |
| Executive summary | This analysis cont | 520490 | Perhaps explain the reason for this discrepancy in paragraph 1 | SANTE | 19.03.2020 | Address | edited text |
| Executive summary | This analysis cont | 560235 | (Austria) If not anyhow foreseen, please provide a list of abbreviations. | AT | 22.03.2020 | Address | list of abbrev. Included |

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| Executive summary | This analysis cont | 621521 | <p>Did the 2018 report use national EQS or the lowest available EQS to calculate chemical status?</p> <p>In general, initiatives/actions of industry (e.g. product stewardship programs, e.g. for S-metolachlor, bentazone, chlorpyrifos) to farmer and advisory services, TOPPS Prowadis, Round Table Initiatives in DE and AT) to reduce/avoid entries of PPP in surface and groundwater are not mentioned in this report.</p> <p>There are numerous recommendations to improve water monitoring – generally considering the need for intensification, diversification and implementation of strategies for improving focus of monitoring, we note that these recommendations are more easily made and less easily resourced...In our view improvements in monitoring focussing simply upon expansion of surveillance in the diverse databases discussed in the report without ability to obtain further information to place detections or exceedances into context is not necessarily a meaningful advancement To Adress this there should be a companion emphasis on greater transparency (besides the analytical strategy issues which are considered in the report we would add the need for more transparency on aspects such as sampling strategy, location and temporal context) so that follow up efforts may be supported to better understand and Adress detections/exceedances. This is a frequent limitation and does not get the attention that it deserves in this report There is also discussion about adjustment of focus of monitoring to consider metabolites more frequently – we would again, return to the need for greater transparency regarding context as discussed above</p> | ECPA | 16.03.2020 | Acknowledge | For status assessment, EQS listed in Annex 10, WFD was used. Monitoring, transparency and data availability is key and important point, and will be further considered. |
| Introduction | 2.1 Problem cont | 521796 | <p>The absence of European data on the sales of biocides, so that their relative importance as a source of pollution is not known</p> <p>The absence of useful European data on the use of PPPs and biocides, which could help to identify areas of intensive use, the relative importance of agricultural and non-agricultural use etc</p> | SANTE | 27.02.2020 | Address | edited text |

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| Introduction | 2.1 Problem cont | 918130 | Chemical interactions and transformations between the active substances of pesticides as well as their synergism, enhancement and antagonism mechanisms are little known. Thus, the final product of these interactions may not be detected in monitoring. | TR | 16.03.2020 | Address | edited text |
| Introduction | 2.1 Problem cont | 410552 | UBA-IV1.3: An additional aspect might be added: the role of pesticide metabolites. Particularly those of no or unknown toxicological relevance (non-relevant metabolites) might be underestimated in their impact, i.e. for water supplying companies and with regard to water processing or mixtures in the field. Despite of frequent detections of particular metabolites in relatively high concentrations, the monitoring data basis is scarce and heterogeneous. | UBA-DE | 16.03.2020 | Address | included the role of metabolites |
| Introduction | 2.1 Problem cont | 300442 | In addition, the main entry route of pesticide in surface waters depends on the application type, the physico-chemical characteristics of the substance (mobility, persistence, volatility), and on soil features (e.g. organic carbon content) and on the weather conditions at and after the application. | EFSA | 16.03.2020 | Acknowledge | |
| Introduction | 2.1 Problem cont | 698986 | Some authors argue that, despite a considerably lower application, the loads of urban pesticides and biocides are in the same range as agricultural pesticides. See for example: Blanchoud H, Moreau-Guigon E, Farrugia F, Chevreuril M, Mouchel JM: Contribution by urban and agricultural pesticide uses to water contamination at the scale of the Marne watershed. Sci Total Environ 2007, 375:168-179. Wittmer IK, Scheidegger R, Bader H-P, Singer H, Stamm C: Loss rates of urban biocides can exceed those of agricultural pesticides. Sci Total Environ 2011, 409:920-932.. | EFSA | 16.03.2020 | Acknowledge | |

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| Introduction | 2.1 Problem cont | 428944 | <p>"...interest in pesticides from regulators..." should also mention the benefits they bring in regard to food security. There are industry data bases for a large number of pesticides submitted as part of the EU approval process, which complement Member State monitoring - this gives good complementary data and a good view on concentrations in surface and particularly groundwater. It is not correct to say that "we know surprisingly little". The toxicity of pesticides in water is determined in a significant number of different tests, according to the requirements of the relevant Regulations under Regulation (EC) No. 1107/2009 and Regulation (EU) 528/2012. These tests cover different taxa and the complete food chain. All these tests are done in a dose/response design which enables the accurate determination of toxicity and no effect levels. Therefore, it should not be stated that the toxicity of pesticides is somehow unclear.</p> <p>Point sources of PPP (excl. biocides) as possible entry sources such as farmyard runoff, spill overs, accidents, illegal disposal of spray liquid remnants or cans, are not explicitly mentioned but could be excluded for clarity.</p> | ECPA | 27.02.2020 | Acknowledge | |
| Introduction | Alongside these s | 476619 | Maybe to reshape last sentence to be clearer. | HR | 12.03.2020 | Address | edited text |
| Introduction | Alongside these s | 789423 | Regarding this paragraf maybe to conclude that since we know little about impact of mixtures, they are not in scope of this report. Or to add in chapter 2.2 - last sentence: "Other chemicals and mixtures which may be present in the water are out of scope of this technical report". | HR | 12.03.2020 | Address | edited text |
| Introduction | Alongside these s | 24353 | the last sentence of this paragraph is out of the scope of this report, which should be factual and refer to results. | SANTE | 12.03.2020 | Address | edited text |
| Introduction | Alongside these s | 111561 | Last sentence: EQS are already precautionary with high safety values. These are able to cover any mixture effects. | ECPA | 22.03.2020 | Address | edited text |

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| Introduction | 2.2 Aim and scop | 519959 | Active pesticide ingredients - better to use the term active substances in line with Reg 1107/2009 and Biocides Regulation. Metabolites appear in many of the tables in the report, so should be included here. Why focus on agriculture only? Many of the actives found were widely used on railways, forestry etc. e.g. atrazine | SANTE | 27.02.2020 | Address | edited text |
| Introduction | 2.2 Aim and scop | 664036 | UBA-IV1.3: Regarding aim and scope of the report, the role of non-relevant metabolites might be clarified: Were they actively excluded or was data too scarce to include them? | UBA-DE | 27.02.2020 | acknowledge | scope was changed according to metabolites as well as overall source of pollution |
| Introduction | 2.2 Aim and scop | 612091 | More emphasis should be put on the presence of a vast quantity of non-pesticidal chemicals - at least as context setting. Leaving them out without more context may result in the usual singling-out of pesticides as the main source of concern. Besides, although this report is meant to cover pesticides active ingredients, there is also mention of some metabolites without sufficient context. | ECPA | 27.02.2020 | acknowledge | right, sources cannot be identifies using substance concentration in waters |
| Introduction | 2.3 Definition and | 214863 | Revise the last sentence to state " Active substances used in both PPPs and biocides are approved at an EU level and EU countries can then authorise PPPs and biocides containing these active substances....." | SANTE | 12.03.2020 | Address | edited text |
| Introduction | Overall, pesticide | 511354 | the classification of pesticides given in Regulation 1185/2009 (statistics of pesticides) should be considered in this report, for consistency. Also because under this Regulation data on sales and use of PPP at MS level are collected | SANTE | 27.02.2020 | Address | Regulation included |
| Introduction | Overall, pesticide | 417575 | The mode of action reported in draft EFSA SR is based uniquely on effects on nervous system, which is of course extremely partial when the focus is on the environment and not on humans only. The classification under table 2.1 is indeed more appropriate, but I wouldn't consider it comparable to the one from the draft EFSA SR. | EFSA | 16.03.2020 | Address | Text slightly adopted |

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| Introduction | Table 2.1 Groups | 573036 | HU:We practically do not have any substantial comment on this chapter, all the included classification of pesticides, sources and uses are agreed. | HU | 12.03.2020 | Acknowledge | |
| Introduction | 2.4 Sources, uses | 454548 | I suggest re-word sentence 1 as follows "Pesticides, which comprise plant protection products and biocides, contain active substances with pesticidal properties" "impossible to achieve absolute selectivity" - I would revise to state "very difficult" | SANTE | 12.03.2020 | Address | edited text |
| Introduction | 2.4 Sources, uses | 456168 | Third sentence: this sentence is incomplete and therefore does not make sense - this statement is not appropriate and should be dropped. Pesticides are approved only if their toxicity to humans is excluded according to their use pattern. The classification of pesticides to be toxic or harmful is based on its intrinsic properties. However, a risk to humans or the environment only occurs where the exposure level exceeds the critical safety level. This is a key element in the discussion and should be mentioned here for the sake of transparency and clarity. | ECPA | 27.02.2020 | Address | edited text |
| Introduction | The pesticide pol | 18319 | This paragraph seems to infer that points c and d do not belong to either diffuse or point sources, but in fact they do. In general, entry routes are either point sources, or diffused (nonpoint-source) ones which are due to transport processes such as soil surface runoff, drainage, preferential flow, leaching, atmospheric deposition and spray drift | EFSA | 12.03.2020 | Address | edited text |
| Introduction | Population growth | 821783 | Bactericides are mentioned as having very high sales, but receive no further mention in the report. Some explanation would be useful as to why this is the case. | SANTE | 27.02.2020 | Acknowledge | |

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| Introduction | Beside the sales d | 843447 | Suggested text "The European Commission developed Harmonised risk indicator 1 (HRI 1) Suggested text "HRI 1 is based on the quantities of active substances placed on the market in PPPs, with a weighting applied to reflect the hazardous properties of the active substances. HRI 1 shows a 20% decrease in the risks associated with PPPs in the 2011-2017 period. " This is an important distinction - HRI 1 does not measure quantities sold. It measures risk. I would leave out "This caused surprise by some". HRI 1 was supported and welcomed by a wide range of stakeholders including Pesticide Action Network. | SANTE | 12.03.2020 | Address | edited text |
| Introduction | Beside the sales d | 251485 | (Austria): There should be a brief explanation of the HRI 1 and also about its interpretation/message. | AT | 12.03.2020 | Acknowledge | no further explanation on result to be on hand |
| Introduction | Beside the sales d | 131202 | HRI index should be explained in detail in terms of how it is calculated and what it represents. Also, are there any suggestions on why the HRI trend has been declining? | TR | 12.03.2020 | Acknowledge | no further explanation on result to be on hand |
| Introduction | Beside the sales d | 369555 | Last sentence - "this caused surprise among some": we suggest to drop this sentence as it is perceived one-sided. This seems more like a personal comment by one of the authors. The cited reference links to an online article about the concern of environmental campaigners. No scientific reason for pros and cons regarding the HRI are given. Individual EU Member State sales indeed demonstrate that a decline is real | ECPA | 12.03.2020 | Address | edited text |
| Introduction | There is a need fo | 473061 | Suggested text "There is a need to develop a management tool....." | SANTE | 12.03.2020 | Address | edited text |
| Introduction | 2.5 Legislation an | 516161 | Given text first mentions about two daughter directives of WFD setting quality objectives for pesticides. Further in the text, Drinking Water Directive (EU 1998) is also given among the directives setting quality standards for pesticides in water. | TR | 12.02.2020 | Acknowledge | |
| Introduction | Register and sour | 516347 |the marketing and use of biocidal products. | SANTE | 12.03.2020 | Address | edited text |

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| Data and information sources | 3.1.1.1. Selection | 354427 | "The report focuses on pesticides, which represent a current water pollution and are still being discharged through use." I think there is a word missing here - the meaning is not clear. Many of the active substances in the report are not currently used, so re-wording is needed to be consistent. Comment: 2007 is now 13 years ago - perhaps better to focus on more recent data only? | SANTE | 16.03.2020 | Address | edited text |
| Data and information sources | Based on the exp | 203474 | HU: The list of data sources is complete, but there can be quite a big difference between the countries concerning the amount of uploaded data. For Hungary only the disaggregated data of first WFD cycle (2008-2012) was uploaded in WISE up to now. The concrete pesticide compounds reported to WISE by Hungary reflects to the priority list of EU for this time period, which is much less than 180 and 159 compounds that was included in the Technical Report. | HU | 03.03.2020 | Address | edited text |
| Data and information sources | Based on the explained sele | | To draft the report it has been used two sources of information very different and heterogeneous. The Waterbase - Water Quality contains data of the monitoring programs established in surface water bodies according to the Water Framework Directive. Those monitoring programmes are established by the Member States and reported. The E-PRTR contains information on emissions declared by industrial facilities and urban waste water treatment plants. We'd suggest to use only one type or information and include the level of confident of both datasets, if used jointly. | ES | 09.03.2020 | Acknowledge | The aim of the report is to show all relevant information sources, however only a part of it will be used for further work. |
| Data and information sources | 3.1.1.2. Target se | 454874 | What about including RACs (acute and chronic Regulatory Acceptable Concentrations) so that more or less all pesticides could have an effect-related threshold, not only those listed under some priority list? | EFSA | 03.03.2020 | Acknowledge | will be checked in further process |

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| Data and information sources | 3.1.1.2. Target se | 548804 | 3rd bullet, 2nd sentence: This does not make sense, as some member states (e.g. Italy) used for most substance the drinking water guidance value of 0.1 µg/L as EQS for surface water, without any justification. Therefore, only ecotox-based EQSs should be included in this process. 3rd bullet, last sentence: what is the justification to consider them relevant? | ECPA | 03.03.2020 | Address | edited text |
| Data and information sources | Groundwater bro | 435702 | It would be interesting, for future assessments, to include also the threshold value of 0.5 µg/L for the total sum of all the substances (a.s. and/or metabolites) detected in a sample. | EFSA | 03.03.2020 | Address | With existing data impossible. Explanation included. |
| Data and information sources | 1. Extraction of di | 287436 | Explanation needs to be added as to what an outlier is. | ECPA | 28.02.2020 | Address | explanation included |
| Data and information sources | 2. For both, aggre | 407615 | Exceedances should generally be analysed in more detail, not just when >1000-fold. For example: clarification is needed whether all the exceedances result from a specific point in time or a specific site? | ECPA | 28.02.2020 | Acknowledge | Indeed we took a rather generalised approach towards outlier exclusion. Substantially more work would be needed to go into details of potential outlier distribution (and use an outlier test) or even to check reasons for outliers. |
| Data and information sources | 3. Calculation of a | 824036 | Aritmetic mean calculations are made at monitoring point level or groundwater body level? | TR | 28.02.2020 | Out of scope | As pointed out in continuation of the same paragraph, groundwater data were calculated by individual monitoring point; thus not aggregated to waterbody level. |

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| Data and information sources | 3. Calculation of a | 846732 | How was spatial pseudoreplication treated? The assumption of independency for sites along a stream network might not be the best choice. | EFSA | 28.02.2020 | Acknowledge | We will discuss within indicator development, if any spatial considerations could be taken into account with the existing data (e.g. upstream-downstream relations, different monitoring site density, size of watershed or body, etc.). |
| Data and information sources | 3. Calculation of a | 625989 | It would be helpful to elaborate a little bit what is meant by "monitoring site". | EFSA | 28.02.2020 | Address | edited text |
| Data and information sources | The data on 180 c | 260743 | HU: The procedure of target setting (EQS), and obtaining the finally evaluated dataset is accepted and agreed. | HU | 03.03.2020 | Acknowledge | |
| Data and information sources | Box 1 Defi | 476586 | typo "measurand" | SANTE | 03.03.2020 | Address | edited text |
| Data and information sources | Box 1 Defi | 593252 | Not very clear. The LOQs higher than the EQS is indeed a problem. How to tackle them can be explained in more detail. | TR | 03.03.2020 | Address | edited text |
| Data and information sources | Figure 3.3 Number | 326336 | (Austria): Number of pesticide monitoring sites by year for groundwater and surface water - found where? In Europe? | AT | 28.02.2020 | Address | edited text |
| Data and information sources | Figure 3.4 illustra | 142177 | The arable land definition used excludes permanent crops e.g. vineyards and orchards, where PPPs are used relatively intensively. So, I don't think this is a useful parameter. | SANTE | 16.03.2020 | Address | edited text |
| Data and information sources | Figure 3.4 illustra | 587228 | I don't quite get the usefulness of calculating the arable land ratio. In the end the spatial coverage is well represented by the number of monitoring sites per area of arable land , irrespectively of the proportion of arable land to total area | EFSA | 16.03.2020 | Address | edited text |

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| Data and information sources | Figure 3.4 illustration | 116756 | HU: There is an error on page 18, in the text about arable land ratio, Hungary is mentioned twice, first above 50%, later between 30 and 40%. In the next paragraph the number the density of the monitoring network is expressed site per hectare, reporting incredibly high numbers from 10 to 47. In the legend of the next figure the density is given as site per 100 km ² , which seems reasonable contrary to the per hectare unit. | HU | 16.03.2020 | Address | edited text |
| Data and information sources | Figure 3.4 Number | 806624 | (Austria): Pie chart: although it is true that almost all sites in AT are groundwater sites, there are still few surface water sites and this could be highlighted in the pie by a thin line like for DK. | AT | 28.02.2020 | Address | change map |
| Data and information sources | Figure 3.6 illustration | 451710 | I don't quite understand the title of this figure. Is this the number of monitoring sites at which these individual pesticides were detected? | EEA | 28.02.2020 | Address | edited text |
| Data and information sources | Figure 3.6 illustration | 319182 | See previous comment under 3.1.1.1 - most of these substances are no longer authorised for use in the EU | SANTE | 27.02.2020 | Acknowledge | mentioned in Annex 6 |
| Data and information sources | Figure 3.6 illustration | 597392 | Fig 3.6 shows organics that are not pesticides: 1,2-dichloroethane, trichloroethane, carbon tetrachloride | CZ | 24.03.2020 | Address | change figure |
| Data and information sources | Figure 3.6 illustration | 81816 | some of the AS shown are banned since many years in the EU (atrazine, DDT, etc), however they are persistent in the environment and therefore obviously they will continue to appear in samples. This would need to be explained somehow (at least adding footnotes). Please consider checking the whole report according to this observation. Thank you | SANTE | 27.02.2020 | Acknowledge | mentioned in Annex 6 |
| Data and information sources | 3.1.2.1. E-PRTR | 716412 | Many of the PPPs marketed and used in the EU are made abroad, and similarly many PPPs made in Europe are exported to non-EU countries for use. So, the relevance of manufacturers is not clear. I do not know of any EU data on this topic of manufacturing PPPs | SANTE | 27.02.2020 | Acknowledge | |

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| Data and information sources | 3.1.2.1. E-PRTR | 115650 | (Austria): Maybe it would be good to not only put abbreviations in the chapter header. Better write: "E-PRTR - European pollutant transfer and release register" | AT | 12.03.2020 | Address | edited text |
| Data and information sources | Table 3.3 Pesticid | 334330 | Comment: Final check will be needed prior to publication - | SANTE | 27.02.2020 | Acknowledge | Non renewable of the approval in 2020 |
| Data and information sources | Table 3.3 Pesticid | 924074 | This table and various other points in the document: Atrazine and/or metabolite and Simazine are shown although it is stated that the active substances in the report were selected from the Waterbase – Water Quality which were “approved and approval expired during the investigation period 2007 – 2017”. Both are non-approved for a longer time and do not match the definition. | ECPA | 27.02.2020 | Acknowledge | Atrazine and Simazine were approved until 2007; additionally, they are listed as priority substances, which were all considered in the assessment |
| Data and information sources | Figure 3.7 shows | 589242 | (Austria): The sentence above figure 3.7 should be corrected as Figure 3.7 shows all facilities which produce pesticides AND all facilities which have pesticide discharges and not only those facilities which produce pesticides. At least the header of Figure 3.7 says so. | AT | 09.03.2020 | Address | edited text |
| Data and information sources | Table 3.5 Pesticid | 998624 | How are diffuse source loads estimated in the different countries? I find it odd that there is no reporting of this (unless I've missed it). | EFSA | 09.03.2020 | Acknowledge | The methodology to obtain the emissions loads vary in different countries. There might be some information in the remark field in the data file or an explanation appended as a separate file in the reporting envelope. However as seen in the table the most countries don't report even an |
| Data and information sources | 3.1.2.3. WFD Inve | 129988 | I am a bit confused. Some of the substances in the list have been banned for decades in EU. How come countries still reports them as pollutant releases from agriculture? Are these considered legacy pollutants? If so, how are "emissions" defined? | EFSA | 03.03.2020 | Acknowledge | We could not revise reportings of the Member States. |
| Data and information sources | 3.2.2. Drinking W | 244367 | "pesticides are present on a regular basis" This is not clear from the data presented up to this point, so I suggest to delete "on a regular basis" | SANTE | 12.03.2020 | Address | edited text |

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| Data and information sources | 3.2.2. Drinking W | 862176 | (Austria): The 3rd sentence is also true for surface and groundwater and not only for drinking water, where it is explicitly emphasised. | AT | 22.03.2020 | Address | edited text |
| Data and information sources | 3.2.2. Drinking W | 152440 | This statement could be valid for the a.s. but not for the metabolites. In fact, in the EU pesticide risk assessment where predicted environmental concentrations in groundwater need to be provided based on mathematical models, it is more likely that the drinking water limit is exceeded by the metabolites rather than the active substance, | EFSA | 10.03.2020 | Acknowledge | |
| Data and information sources | 3.2.2. Drinking W | 981320 | The statement about the lack of acceptable doses is rather incorrect. Data on acceptable doses for chronic exposure should be available for all pesticides assessed, i.e. approved and not approved following an EU assessment. | EFSA | 22.03.2020 | Address | edited text |
| Data and information sources | 3.2.2. Drinking W | 159572 | 1st paragraph: This statement is misleading and incorrect. The health risk from pesticides in drinking water is not difficult to assess - for each and every pesticide on the market there are certainly enough toxicity data to define a reliable chronic ADI. These ADIs are generally orders of magnitude higher than the limit value of 0.1 µg/L, and this very EEA report shows that compliance with that limit value is very close to 100% - it is completely misleading to insinuate chronic pesticide exposure at relevant concentrations via drinking water. And finally, there are certainly no analytical problems anymore for a long time to monitor drinking water at the level of 0.1 µg/L. | ECPA | 22.03.2020 | Address | edited text |
| Data and information sources | For reporting pur | 466721 | Typo - bentazone, appears in other sections also | SANTE | 27.02.2020 | Address | edited text |

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| Data and information sources | For reporting purposes | 944382 | lists S-metolachlor S-metolachlor is a optical isomer that is not analysed, just melolachlor is usually analysed (mixture of optical isomers), in order to analyse S-metolachlor a special chiral analysis must be utilised to distinguish optical isomers. I would put an appropriate remark in the text at least or change S-metolachlor to metolachlor in order to keep consistent substance naming throughout the whole report (other chapters use metolachlor) | CZ | 10.03.2020 | Address | added footnote and note on this issue |
| Data and information sources | For the presented | 409406 | 2nd paragraph: we believe a 60% monitoring rate in large water supply zones does allow to derive information on <u>pesticide risks to drinking water</u> . | ECPA | 22.03.2020 | Acknowledge | Statement was due to given reference. |
| Data and information sources | Figure 3.8 Share of | 279958 | Possibly mecoprop-p, which is approved. mecoprop is non-approved | SANTE | 22.03.2020 | Acknowledge | This was due to given assessments |
| Data and information sources | Figure 3.8 Share of | 152172 | S-metolachlor is a optical isomer that is not analysed, just melolachlor is usually analysed (mixture of optical isomers), in order to analyse S-metolachlor a special chiral analysis must be utilised to distinguish optical isomers (this applies to all optical isomers such as Mecoprop-P, MCPP-P). I would put an appropriate remark in the text at least or change S-metolachlor to metolachlor in order to keep consistent substance naming throughout the whole report (other chapters use metolachlor). | CZ | 10.03.2020 | Acknowledge | The name is based on the list in DWD data dictionary (to be found here : https://rod.eionet.europa.eu/obligations/171). Many countries report CAS 87392-12-9 as substance monitored in drinking water |
| Data and information sources | Table 3.7 Overview of | 560810 | Have you not considered OpenFoodTox? https://www.efsa.europa.eu/en/microstrategy/openfoodtox | EFSA | 12.03.2020 | Acknowledge | Focus is solely on food |
| Data and information sources | Box 2 Example of | 303884 | authorization - US spelling, appears in other sections also | SANTE | 12.03.2020 | Address | edited text |
| Data and information sources | Box 2 Example of | 430610 | not very clear. The LOQs higher than the EQS is indeed a problem. How to tackle them can be explained in more detail. | EFSA | 27.02.2020 | Acknowledge | Addressed in Box 1 |

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| Data and information sources | Box 2 Example of | 234515 | 2nd paragraph - "...the representative monitoring of pesticides in small waters in the agricultural landscape...": the term representative monitoring should not be used here as these are targeted "event-driven" point samples. Representativeness can only be achieved if several samples distributed over the year are taken. | ECPA | 27.02.2020 | Acknowledge | |
| Data and information sources | 3.4. data availability | 10789 | Another uncertainty is the potential mismatch between substances applied and substances monitored in a certain area, unless there is some way for aligning this. | EFSA | 03.03.2020 | Acknowledge | Addressed elsewhere |
| Data and information sources | 3.4. data availability | 560301 | In principle, we agree with the statement about lack of data over multiple years, particularly for groundwater data. However, any temporal trend data in surface water will only be credible in rather big water bodies, where input are coming from a rather large and diverse watershed. The situation in smaller water bodies is much more dynamic over a single year than it is across several year, therefore making a long-term analysis rather | EFSA | 28.02.2020 | Acknowledge | We will discuss within indicator development, if any spatial considerations could be taken into account with the existing data (e.g upstream-downstream relations, different monitoring site density, size of watershed or body, etc.). |
| Data and information sources | 3.4. data availability | 142443 | HU: In part 3.4 data uncertainties are discussed, Hungary has reported all disaggregated values according to Directive 2009/90/EC. | HU | 28.02.2020 | Acknowledge | Description of uncertainties is general, for the complete dataset, which is sourced from 34 countries. |
| Data and information sources | Qualitative data c | 250214 | HU: On page 31, in the second paragraph EQS is called „ecological quality standard”, while its correct name is “environmental quality standard” | HU | 12.03.2020 | Address | edited text |
| Status of information on pesticides | Table 4.1 Number | 391096 | Metolachlor was banned in 2002 in the EU, so possibly S-metolachlor? Table contains many metabolites, but this is no stated in the heading | SANTE | | Address | Footnote included in Annex 6 and Table 4.1 |
| Status of information on pesticides | Table 4.1 Number | 737851 | I would clearly distinguish active substances and transformation products (metabolites). glyphosate, oxadiazon, diflufenican, omethoate, thiacloprid: where the EQS come from? Could not find a reference | CZ | 27.02.2020 | Address | explanation box included |

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|-------------------------------------|--------------------|--------|---|--------|------------|-------------|--|
| Status of information on pesticides | Table 4.1 Number | 39780 | This table is misleading/of limited value: it needs to include the measured values to put the exceedance into perspective. In many cases, an "EQS" of 0.1 µg/L was used for surface water. There should at the very least be a footnote for those compounds where that value is not based on ecotox data, in particular indicating that exceedance of the "EQS" does not mean any ecological risk. Even better if EEA would only use risk-based EQS values. | ECPA | 04.03.2020 | Address | item addressed in chapter 3.1.1.2 |
| Status of information on pesticides | Figure 4.1 shows | 925095 | This paragraph is not clear to me. What is the observation unit? The single sampling event (in a specific site) or each individual site with all samplings "aggregated" by year? | EFSA | 02.03.2020 | Address | edited text |
| Status of information on pesticides | Figure 4.1 shows | 756508 | I find this assessment a bit lacking in information and ignoring potential spatial (and perhaps temporal, pending on the comment above) correlation. For example, if multiple sampling points are present in the same watershed (or even on the same water body) they will be likely to present correlated results. More in general, areas with more sampling sites will weight more on the final result of the index. In addition, with the current approach, an exceedance of 1% of the EQS is counted as equal to a 10-fold exceedance. One alternative way for [partially] accounting for most of these issues is the STE (Spatial, Temporal and Extent of PNEC exceedances) approach promoted by the JRC (Carvalho et al. 2015). | EFSA | 02.03.2020 | Acknowledge | After building the indicator and knowing data better than now, we will discuss whether we should do such assessment. |
| Status of information on pesticides | The results show | 817079 | This paragraph is confusing and should be re-written to improve clarity. | ECPA | 22.03.2020 | Address | edited text |
| Status of information on pesticides | In 2009 the EQS of | 436549 | DE-NRW: For readers who are not familiar with the subject matter, this text reads as a contradiction to the paragraph in chapter 3.1.1.3, which needs to be described more clearly. | UBA-DE | 22.03.2020 | Address | edited text |

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| Status of information on pesticides | In 2009 the EQS d | 97815 | This paragraphs is confusing and should be re-written to improve clarity. | ECPA | 22.03.2020 | Address | edited text |
| Status of information on pesticides | 4.1.1.2. Pesticides | 364101 | Different naming is used i.e. Deisopropyldeethylatrazine vs. Desethylatrazine either use desethyl or deethyl | CZ | 27.02.2020 | Address | edited text |

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|-------------------------------------|---|--------|--|------|------------|--------------|---|
| Status of information on pesticides | 4.1.1.2. Pesticides in groundwater Table 4.2 shows in analogy to the results of pesticide substances in surface waters (section 4.1.1.1), the number of substances and their exceedance rate for groundwater. The total number of records within the group of herbicides in the time period 2007 – 2017 is some 1,400,000, and the substances with the most exceedance rate are Deisopropyldeet | 321786 | General comment: Monitoring reports of EU Member States (and summary reports thereof at EU level) usually do not carry an appropriate description of possible quality deficiencies of monitoring results, more specifically concerning their probability and frequency of occurrence. This is surprising: for years it is common practice in EU MS that applicants do provide to authorities assessments of exceedances in GW and their possible causality. However, this is not reflected in the monitoring reports. In this context it is common that faulty monitoring stations are identified by the manufacturer of an active substance and reported to the responsible authorities as requested. Such compromised monitoring stations often do not even meet the standards of the competent environmental or water agencies or those stipulated by national authorities for such a monitoring. Experience of the plant protection industry shows that faulty monitoring stations may continue to be used and therefore false-positive exceedances are still reported. Some examples are: a) monitoring stations (or their nearest up-gradient vicinity) are visibly permeable and open to above-ground contamination, b) some monitoring stations are located at inner-city locations, away from any agricultural use, c) some stations are clearly exposed to sewage water influence. These problems are well known in EU Member States but not mentioned in monitoring reports. In absence of a description of known deficiencies in monitoring quality it is often postulated that the regulatory approval process is not suitable to manage contamination and therefore requires further | ECPA | 04.03.2020 | Out of scope | It is impossible to check representativeness of monitoring stations at EEA level. On the other hand it is rule, that MS should report high quality managed stations only. |
| Status of information on pesticides | Reported insectic | 623251 | 1,2-dichloroethane is not a pesticide | CZ | 27.02.2020 | Address | deleted |

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|-------------------------------------|----------------------|--------|--|-------|------------|-------------|--|
| Status of information on pesticides | Reported insecticide | 92889 | It would be worth to mention differences of environmental properties and fate of herbicides (usually more polar and mobile), fungicides and insecticides (usually less polar and less mobile), that would help to explain the differences in occurrence and exceedances | CZ | 27.02.2020 | Acknowledge | |
| Status of information on pesticides | Table 4.2 Number | 477273 | 1,2-dichloroethane and carbon tetrachloride - these are not pesticides | CZ | 27.02.2020 | Address | delete substances |
| Status of information on pesticides | Table 4.2 Number | 288538 | HU: We have no comment for the surface waters, for the groundwater our observations are aligning with Table 4.2. | HU | 12.03.2020 | Acknowledge | |
| Status of information on pesticides | Figure 4.3 shows | 640727 | There seem to be three words missing in the 3rd sentence (should read: "the DECREASING TREND OF exceedances..."). More importantly, it is highly unlikely that issues with the LoQ and a resulting bias is responsible for the observed decline. This may be partially true for SW, where EQS limit values keep changing and can be far below 0.1 µg/L. But in groundwater the limit value is fixed at 0.1 µg/L for decades, and any official groundwater analysis done within the last 20 years will have used a method that fully covers that LoQ. Last sentence: direct comparison between SW and GW regarding number of AI and/or metabolites exceedances should not be made. | ECPA | 04.03.2020 | Address | Last sentence not deleted. |
| Status of information on pesticides | 4.1.2. E-PRTR Table | 677511 | "widely in use" Diuron is authorised in just 2 MS https://ec.europa.eu/food/plant/pesticides/eu-pesticides-database/public/?event=activesubstance.detail&language=EN&selectedID=1271 , so I'm not sure it's currently widely used. We don't have EU sales data broken down by active substance to have exact details on sale, and hence use. | SANTE | 09.03.2020 | Address | edited text (It is one of the most often monitored substances) |

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| Status of information on pesticides | Table 4.3 Total pe | 870562 | Suggest to remove the three substances with n.d. values | SANTE | 09.03.2020 | Address | changed table |
| Status of information on pesticides | Most of the E-PR | 389588 | Chlordane is not approved as a PPP or biocidal active substance. Suggest to delete "if the approval of the biocide usage group is not finalised, in which this substance is included in one of the products " | SANTE | 10.03.2020 | Acknowledge | |
| Status of information on pesticides | Most of the E-PR | 926349 | UBA-IV1.3: According to EU Pesticide Database Chlordane is not approved and the approval of Diuron will expire in September 2020 (no renewal). Diuron is approved and frequently used as biocide. | UBA-DE | 10.03.2020 | Address | changed |
| Status of information on pesticides | Most of the E-PR | 516206 | How can a facility emit substances that are not "in use" anymore? This is not fully clear to me. | EFSA | 09.03.2020 | Acknowledge | There are several possible reasons for it: E-PRTR covers longer period also the period before banning some of the substances, - some substances are not used as pesticides anymore but might be used for manufacturing other substances, - most of the facilities monitoring pesticides in their discharge are urban waste water treatment plants, where the |
| Status of information on pesticides | Based on E-PRTR | 575328 | kg/a - what does this mean? Perhaps explain why the load is so high in Belgium relative to other MS? | SANTE | 09.03.2020 | Address | edited text |

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| Status of information on pesticides | Section 4.1.2 | | Section 4.1.2 of the report and Table 4.3 reflect that Spain emits 99.5% of simazine contamination. This information has been obtained from the PRTR. The E-PRTR of Spain has been consulted online and it has been found that the data comes from the BESÒS Urban water treatment plant in Barcelona. This treatment plant declares that the emission to water of simazine in 2017 was 6,590 Kg. This information does not come from the data of the Monitoring Programmes established by the General Water Directorate, so it has not been possible to verify it. The E-PRTR is run by the General Directorate for Biodiversity and Environmental Quality of this Ministry. We have checked the data with them as it seems to be an anomalous data. In February 2020, the Catalanian Autonomous region reported that the 2017 data were wrong, as the data of 2014, 2015 and 2018. These data have been modified accordingly in the Spanish EPTR, but they are still pendiente to be corrected in the European PRTR, as it is not possible to directly correcreported. Some examples are: a) monitoring stations (or their nearest up-gradient vicinity) are visibly permeable and open to above-ground contamination, b) some monitoring stations are located at inner-city locations, away from any agricultural use, c) some stations are clearly exposed to sewage | ES | 09.03.2020 | Address | updated table |
| Status of information on pesticides | 4.1.3. Waterbase | 593916 | It is questioned if sales data could be retrieved from ECPA. It would be interesting to investigate a possible correlation between the "usage" and the occurrence of pesticides in groundwater at a catchment scale. | EFSA | 04.03.2020 | Acknowledge | sales data discussed in section 2.4 |

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| Status of information on pesticides | 4.1.3. Waterbase | 423128 | Using the "emission models" (NMI3 and WEISS), sales data is multiplied with constant emission factors (see Fig 4.5 which clearly shows that the curves of the different compounds have identical shape). The temporal trends the models give are therefore the same as when just using sales data, and are therefore at least redundant, if not meaningless. Specifically, it should be mentioned that models do not consider the increasing implementation of mitigation and stewardship measure which reduce emissions even when the use rate remains the same. The WEISS model is a specific model (is it peer-reviewed?) for a specific MS featuring specific pedoclimatic conditions and other environmental conditions. Reader might draw biased conclusions relative to other MS | ECPA | 09.03.2020 | Acknowledge | an example should be given to show uncertainties |
| Status of information on pesticides | Table 4.5 shows t | 605252 | ".....and 17% in France are affected by pesticides from agriculture" How is this link to agriculture established? If not clear, perhaps delete. Many of the problem actives were used in forestry, railways etc. | SANTE | 13.03.2020 | Address | edited text |
| Status of information on pesticides | Table 4.5 shows t | 277016 | Column headers need to provide better explanation, otherwise unclear - the text description is not clear either. | ECPA | | Acknowledge | List of grouping is given in Annex 6 |
| Status of information on pesticides | Based on the pub | 566418 | Are exceedances due to Tributyltin in groundwater or surface water? I am asking because the sentence is about surface water but the rest of the paragraph is about groundwater. | EFSA | 04.03.2020 | Address | edited text |
| Measures | In the Program of | 843620 | Paragraph above Table 5.1: numbers given here are not plausible, e.g. $(285 * 21) + (6 * 25) + (19 * 243) = 10752$, i.e. ~10800 basic measures instead of 12800. Moreover, it is stated that only 4% can be assigned to mitigation measures to reduce pesticide contamination. That is confusing, i.e. isn't the latter already predefined by those put in KTM 3. Here we have a total amount of $21 * 285 = 5985$ which are ~56% of all basic measures. | ECPA | 12.03.2020 | Acknowledge | the two columns cannot be multiplied. It illustrates the information, that in e.g. 21 MS in total 285 measures were implemented (mean of 13.5 measures per MS). |

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| Measures | 5.1.2. Measures u | 862331 | HU: Chapter 5 – Measures In the second paragraph of 5.1.2 the protection of raw water is emphasised in connection with drinking water supply. We would like to draw the attention that in Hungary mainly protected, deep ground water and bank filtered surface water and somewhere karstic water are used to gain raw water. Practically, shallow groundwater is not utilized for this purpose. | HU | 12.03.2020 | Acknowledge | |
| Measures | Three case studie | 861978 | Delete (automatoc weed detection and chemical application system) and add thus avoiding spray drift | SANTE | 12.03.2020 | Address | edited text |
| Measures | A screening of the | 106474 | Typo: A screening of the implemented NAP, should be NAPs "Research, e.g. Study of pesticide wash off in soils, establishment (spread) of cultivation mode and/or plant edges to prevent wash-off and soil erosion" prehaps re-word to make clearer? "Implementing the use of herbivorous fish to limit aquatic plants in basins (Walloon fish farms)" - It is not clear that this is relevant to pesticides. "All available NAPs were screened, and the most valuable types of measures listed." Suggest to revise "All available NAPs were screened, and relevant measures for water protection listed" | SANTE | 12.03.2020 | Address | edited text |
| Measures | Within the report | 588666 | "Within the report, examples for an improved implementation of regulations, actions and measures - named as best practices - were analysed in six out of 28 Member States:" Suggested text "Within the report, examples of best practices were highlighted in six out of 28 Member States" meters - US spelling | SANTE | 12.03.2020 | Address | edited text |

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| Conclusions and future perspectives | We lack an overview | 774578 | I very much agree with the final conclusion of the report, which clearly highlights the need for a more coordinated effort in order to draw a much more reliable picture of pesticide contamination of European waters. | EFSA | 12.03.2020 | Acknowledge | |
| Conclusions and future perspectives | We lack an overview | via email | Harmonization of data gaps might be helpful - but with a sense of proportion. The local situation and necessity should determine the monitoring - and not a standardized requirement from Brussels. " Regardless of this, I know how difficult it is to evaluate and evaluate the existing data at European level ... and more investigations are always desirable (and I would also like to have them). But whether this report helps - I don't know ... The authors may therefore look at this somewhat "general criticism" - but the events around the Fertilizer Ordinance and the evaluations / conclusions on the European side make me somewhat "sensitive" | DE (NRW) | 05.03.2020 | Acknowledge | |
| Conclusions and future perspectives | This report has covered | 417499 | The report shows a different picture than scientific literature (I know that is due to limited data availability in the Waterbase). The most problematic substances are namely metabolites of herbicides such as chloridazon, metazachlor, alachlor, acetochlor, metolachlor, dimethachlor etc. that are poorly covered in this report. | CZ | 05.03.2020 | Address | edited text |
| Conclusions and future perspectives | The Waterbase – | 837494 | could facilitate effective use of scarce resources. suggest to change to could facilitate the more effective use of scarce resources. | SANTE | 12.03.2020 | Address | edited text |

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| Conclusions and future perspectives | The Waterbase – | 469091 | <p>We support the effort to increase comparability and quality of monitoring data. With respect to monitoring stations this means that site selection should focus on, for example, representativeness and not on number of stations.</p> <p>Last sentence: it is a simplification to save resources that will result in undue bias of results. This contradicts the monitoring principles recommended in other legislation. Resources can be better saved by looking into the appropriate set of substances.</p> | ECPA | 05.03.2020 | Address | edited text |
| Conclusions and future perspectives | Enhanced monito | 174138 | <p>Together with agricultural area usage suggest to change to</p> <p>Together with detailed EU-wide data on the sale and use of both PPPs and biocides</p> <p>as these substances not only hint to their ‘mother’ substance, but many of these still have toxic potential (assigned to an EQS) and therefore increase the overall toxicity to organisms.</p> <p>suggest to change to</p> <p>as these substances are derived from ‘mother’ substances, and many of them have toxic potential (assigned to an EQS) and therefore increase the overall toxicity to organisms.</p> | SANTE | 05.03.2020 | Address | edited text |

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| Conclusions and future perspectives | Enhanced monitoring | 79534 | <p>UBA-IV1.3: We suggest to add further aspects on pesticide metabolites here or in other sections of the report:</p> <ul style="list-style-type: none"> - As mentioned above, the role of non-relevant metabolites might be underestimated. In Germany, some of these have been measured in high concentrations and cause problems for water supplying companies and in water processing (LAWA, 2019; NLWKN, 2016; LfU, 2019; Schmidt and Brauch, 2008 - references included in www.uba.de/empfehlungsliste). As far as we know, the data basis is scarce and heterogeneous among substances, regions and member states. - In our view it is important to extent monitoring data with regard to metabolites. UBA published a list of metabolites recommended for groundwater monitoring and prioritised on formation rate, leaching behaviour and sales rates of the active substance. The list addresses public authorities responsible for groundwater monitoring, but also water supplying companies, health agencies and other stakeholders. <p>The respective document is published online: www.uba.de/empfehlungsliste (German). It describes the choice and prioritisation process and contains the recommendation list with further information on each metabolite and the respective active substance. Please consider adding the link to the report.</p> | UBA-DE | 27.02.2020 | Address | added in other sections |
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| Conclusions and future perspectives | Enhanced monitoring | 765072 | I find it striking that, in the entire report, there is no mention of modelling tools. There is a large body of literature demonstrating that the processes driving pesticide contamination of surface and groundwater are more or less understood and they could be modelled effectively. These models could help a lot in both providing a better overall picture and, more importantly, to optimize any monitoring strategy in terms of balancing efforts over time and space | EFSA | 17.03.2020 | Address | Short para on modeling was added at the beginning of the report |
| Conclusions and future perspectives | Enhanced monitoring | 355666 | "Additional analysis of spatial and temporal distribution..." clearly speaking against event-driven monitoring which would result in biased simplification. Clear distinction between non-relevant and relevant metabolites needs to be made based on their difference to meet relevant threshold values. | ECPA | 27.02.2020 | Acknowledge | |

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| <p>Conclusions and future perspectives</p> | <p>Enhanced monitoring and fu</p> | <p>The concentration of pesticides in inland water is monitored by the competent authorities of the River Basin Districts, and the information is included in the RBMPs, if it exist. It has been established operational monitoring programmes according to the WFD to carry out the monitoring. For the purpose of improving efforts to monitor water resources, guaranteeing the same level of demand and the same method nationwide, approval was given to Royal Decree 817/2015, of 11 September. In this regulation is set the criteria for the monitoring and evaluation of the surface water status, ant the environmental quality standards https://www.boe.es/buscar/doc.php?id=BOE-A-2015-9806. In this national legal instrument it is established that the concentration of pesticides in water bodies at risk of not reaching good status due to agricultural significant pressures must be controlled. Currently, the following pesticide list is controlled through the monitoring programmes by the nine river basin district competent authorities that manage the twelve river basin districts at the Central Government level: More information on pesticides and the monitoring programmes in the other 13 Spanish River Basin Districts, managed at a regional level, can be found in the second River management Plans: https://www.miteco.gob.es/es/agua/temas/planificacion-hidrologica/planificacionhidrologica/ planes-cuenca/</p> | <p>ES</p> | <p>05.03.2020</p> | <p>Acknowledge</p> | |
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| Conclusions and future perspectives | Enhanced monitoring via email | | In my opinion, the report at European level only records a fraction of the PSM measurements actually available in Germany, since these are only supplied / reported to Brussels to a limited extent. I suspect that this could apply accordingly to other member states. Against this background, conclusions regarding the actual pollution of the water and groundwater with PSM are difficult and erroneous. This large discrepancy between actual monitoring and monitoring known at EU level should be addressed - as this must be taken into account when making conclusions. Against this background, the recommendations / demands regarding more investigations from a European level should be critically examined | DE (NRW) | 05.03.2020 | Address | edited text |
| Conclusions and future perspectives | Data availability from | 342809 | Data availability from scientific projects seems to be very diverse and their quality may also differ. suggest to change to Data availability from scientific projects is very diverse and of variable quality | SANTE | 13.03.2020 | Acknowledge | |
| Conclusions and future perspectives | One goal of this text | 984071 | The historically developed and used way by regulatory bodies is the assessment of risk suggest to change to The current approach by regulatory bodies is the assessment of risk | SANTE | 13.03.2020 | Address | edited text |
| Conclusions and future perspectives | In human pharmaceuticals | 824067 | (Austria): To mention effects of mixtures and sum effects is very important, but this could have been mentioned and described earlier in the text and not only in the conclusions. E.g. when speaking about detection of several pesticides in a sample, sum concentrations, etc...) | AT | 15.03.2020 | Address | Short para was added in the introduction part. |

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|-------------------------------------|-------------------|--------|--|-------|------------|-------------|---|
| Conclusions and future perspectives | Such an indicator | 894349 | Such an indicator also could for example combine toxicity risk assessment of monitored pesticide concentrations with agricultural area uses to identify suggest to change to Such an indicator also could for example combine toxicity risk assessment of monitored pesticide concentrations with data on the sales and use of all pesticides (PPPs and biocides) uses to identify..... | SANTE | 13.03.2020 | Acknowledge | It could be combine with agricultural use; if and how to include sales data is an open question, which should not be mentioned in this first results report |
| Annexes | Annex 6 Overview | 165460 | Contains substances that are not pesticides: 1,2-dichloroethane, Arsenic and its compounds, Carbon tetrachloride | CZ | 27.02.2020 | Address | edited tables |
| Annexes | Annex 6 Overview | 350722 | Table headers: AA-EQS: only the EU AA-EQS should be listed here. It does not make sense to always use the lowest MS EQS, as some Member States did not derive EQS according to the CIS guidance no. 27, but used the DW limit value, for instance. MAC-EQS: only the EU MAC-EQS should be listed here. And see AA-EQS comment. AA-EQS regulated in MS: it would be worthwhile to list all existing MS EQS values, providing a good overview about the variability of EQS MS values. Lowest AA-EQS regulated in MS: why is always the lowest EQS value used? Actually, the one with the most solid and scientific derivation procedure should be used to calculate EQS exceedances in this report. See also comment on use of the 0.1 µg/L value as AA-EQS for many compounds: it is not ecotox-based and contradicts the CIS guidance no. 27 on derivation of EQS values. Therefore, all 0.1 µg/L values based on the DW limit value should not be used to calculate EQS exceedances in this report. | ECPA | 05.03.2020 | Address | edited tables |

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| Annexes | Annex 6 Overview of pesticides | <p>In Annex 6 of the report is showed the relationship of pesticides with the Environmental Quality Standard (EQS) expressed as the annual average EQS (AA-EQS) and maximum acceptable concentration EQS) (MAC-EQS). It is not possible to correlate an AA-EQS value to the Watch List substances because it has not been calculated for now. The value included in Annex 6 is the desirable detection limit. Using this value as AA-EQS is not an accurate approach that could create a misunderstanding, so we'd kindly suggest not to be include it in the draft technical report</p> | ES | 05.03.2020 | Acknowledge | see explanation in 3.1.1.2 |
|---------|--------------------------------|--|----|------------|-------------|----------------------------|