

# PUBLIC CONSULTATION ON THE EVALUATION AND IMPACT ASSESSMENT OF DIRECTIVE 2009/128/EC ESTABLISHING A FRAMEWORK FOR COMMUNITY ACTION TO ACHIEVE THE SUSTAINABLE USE OF PESTICIDES

Fields marked with \* are mandatory.

## Introduction

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### About this consultation

#### Target group

All EU as well as non-EU citizens are welcome to contribute to this consultation.

#### Objective of the consultation

The public consultation aims to collect the views of citizens on the EU legislation on the use of pesticides for agricultural and non-agricultural use as well as by professional and non-professional users. It seeks to receive information on how citizens view the strengths and weaknesses of the current legislation and the perceived level of protection of human and animal health and the environment

**What is a pesticide?** A pesticide is a product that prevents, destroys, or controls a harmful organism (the 'pest') or disease. The most important part of a pesticide is the so-called active substance. Just as in a drug treating human diseases, the active substance in a pesticide is the key component that brings about the desired effect. Pesticides can be chemicals or microorganisms. They are further classified into categories depending on their hazard to health and the environment.

**How is pesticide use controlled at EU level?** Pesticides (plant protection products) are used against plant pests, plant diseases and for weed control mainly in agriculture but also in forestry and green urban areas. Since pesticides can have harmful effects on the environment and on human health, they are strictly regulated at EU level through "*DIRECTIVE 2009/128/EC, establishing a framework for Community action to achieve the sustainable use of pesticides*", also named the Sustainable Use Directive (SUD).

The EU Member States are involved in implementing the rules of the sustainable use Directive. The Directive sets the general objectives, while the Member States transpose them into national quantitative objectives, targets, measures and timetables via their National Action Plans. The European Commission established harmonised risk indicators that are used by Member States for risk management at national level. The Commission evaluates progress on the objectives based on national reporting on these indicators.

The [2020 implementation report](#) prepared by the Commission found significant shortcomings in the implementation, application and enforcement of various elements of the sustainable use Directive by Member States. In view of established deficiencies and in line with the ambitions under the Commission's Green Deal to reduce the use and risk of chemical pesticides, the Commission is planning a revision of the

sustainable use Directive to address its limited effectiveness. The Commission will base its revision on a [back-to-back evaluation and impact assessment](#).

This Public Consultation is part of a broader [consultation strategy](#), which includes stakeholder surveys designed to collect the views of stakeholder organisations and Member State Authorities. Further information on the consultation strategy, as well as links to the stakeholders surveys, can be found on a [dedicated website](#) of the European Union. The responses will be taken into consideration in preparation of a Staff Working Document, written by the European Commission, presenting the results of the back-to-back assessment.

## How to submit your response

Your views are important. Please tell us what you think and fill the online questionnaires.

The questionnaire for citizens is accessible in all official EU languages. You can submit your reply in any of the 23 official EU languages. As there may be delays in translating replies submitted in some languages, contributions in English are welcome as they will help to process the survey more swiftly.

You can pause at any time and continue later. Once you have submitted your answers, you will be able to download a copy of your completed questionnaire. Questions marked with an asterisk are compulsory.

Please note that in this questionnaire, we do not intend to obtain data relating to identifiable persons. Therefore, in case you will describe a particular experience or situation, please do it in a way that will not allow linking to a particular individual, whether it is you or somebody else.

Received contributions may be published on the Internet. It is important that you read the specific *privacy statement* attached to this consultation for information on how your personal data and contribution will be dealt with.

**We thank you in advance for your time and input.**

## Related Web Links

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[COMBINED EVALUATION ROADMAP / INCEPTION IMPACT ASSESSMENT](#) for revision of the sustainable use of pesticides Directive

[Directive 2009/128/EC](#) of the European Parliament and of the Council of 21 October 2009, establishing a framework for Community action to achieve the sustainable use of pesticides

[Commission Directive \(EU\) 2019/782](#) amending Directive 2009/128/EC of the European Parliament and of the Council as regards the establishment of harmonised risk indicators

[Regulation \(EC\) No 1185/2009](#) concerning statistics on pesticides

[Regulation \(EC\) No 1107/2009](#) concerning the placing of plant protection products on the market

[Directive 2009/127/EC](#) amending Directive 2006/42/EC with regard to machinery for pesticide application

## Contact

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European Commission  
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## About you

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### \* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak

- Slovenian
- Spanish
- Swedish

\* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

\* First name

Nikolai

\* Surname

PUSHKAREV

\* Email (this won't be published)

nikolai@epha.org

\* Organisation name

*255 character(s) maximum*

European Public Health Alliance (EPHA)

\* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)

- Large (250 or more)

\*Country of origin

Please add your country of origin, or that of your organisation.

- Afghanistan
- Åland Islands
- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Djibouti
- Dominica
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Libya
- Liechtenstein
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Saint Martin
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands

- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
  
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
  
- Burkina Faso
- Burundi
  
- Cambodia
  
- Cameroon
  
- Canada
- Cape Verde
  
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
  
- Grenada
- Guadeloupe
  
- Guam
  
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
  
- Guyana
  
- Haiti
- Heard Island and McDonald Islands
  
- Honduras
- Hong Kong
  
- Hungary
  
- Iceland
  
- India
- Indonesia
  
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Nauru
  
- Nepal
  
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
  
- Niger
  
- Nigeria
- Niue
  
- Norfolk Island
- Northern Mariana Islands
- North Korea
  
- North Macedonia
- Norway
- Oman
  
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
  
- Syria
  
- Taiwan
- Tajikistan
- Tanzania
- Thailand
  
- The Gambia
  
- Timor-Leste
- Togo
  
- Tokelau
- Tonga
  
- Trinidad and Tobago
- Tunisia
  
- Turkey
- Turkmenistan

- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

Denmark

Liberia

Saint Lucia

## Transparency register number

*255 character(s) maximum*

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

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The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

### \* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

**Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

**Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

## General views concerning the use of pesticides/plant protection products relevant to implementation of the sustainable use Directive

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How do you rate your knowledge:

	Good knowledge	Limited knowledge	No knowledge	Don't know /decline to answer
* on appropriate measures to protect the aquatic environment/surface water when using pesticides?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* on appropriate measures to reduce human exposure to pesticides when using pesticides close to houses where people live?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* of how to safely use pesticides?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* of how to safely store pesticides?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* of how to safely dispose of pesticides?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

\* Have you completed a training course concerning the safe use of pesticides?

- Yes
- No
- Don't know/decline to answer

\* In your daily professional or private life do you receive any information about the safe use, storage and disposal of pesticides?

- Yes
- No

\* How informed do you believe you are of the impacts that pesticides currently used in the EU may have on the environment and human and animal health?

- Well informed
- Informed
- Somewhat informed
- Not at all informed
- Don't know/decline to answer

Please, indicate the extent to which you agree with the following statements:

	strongly agree	agree	disagree	strongly disagree	no opinion
* The pesticides I can buy in the EU are safe for human and animal health and the environment when they are used properly	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

* Some pesticides available for purchase in the EU pose greater hazards to human and animal health or the environment than others	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Chemical pesticides available for purchase in the EU generally pose a higher risk to human and animal health and the environment than non-chemical pesticides	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* It is necessary to reduce <b>the use</b> of chemical pesticides in the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* It is necessary to reduce <b>the risk</b> of chemical pesticides in the EU	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* It is necessary for Member States to set national targets to reduce the risk and use of chemical pesticides	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* It is necessary for the EU to set targets to reduce the risk and use of chemical pesticides	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

\* Do you think that the public should be informed when pesticides are being used or sprayed in your local area (for example in the town or village where you live or close to your house, in a local park etc., regardless of whether the pesticide is being used for an agricultural or non-agricultural purpose)?

- Yes, certainly
- Yes, probably
- No , probably not
- No, certainly not
- Don't know/decline to answer

\* Are you aware of alternatives to chemical pesticides for the purposes of crop protection in the EU?

- Yes
- No
- Don't know/decline to answer

## **Introduction to policy options questions**

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The sustainable use Directive sets objectives at EU level to achieve the sustainable use of pesticides but lets the Member States design and define the actions and methods to achieve the objectives, while taking into consideration the specifics of each Member State. Various data and reports demonstrate shortcomings

in the implementation, application and enforcement of the Directive across Member States. The Commission is planning a revision of the legislation to address the identified problems. This is in line with the ambitions under the Commission's Green Deal to reduce the use and risk of chemical pesticides. The purpose of the questions to follow is to determine public opinion on the choice and potential impacts of some possible future policy options.

## How important are in your view the following issues for future EU policies on the sustainable use of pesticides?

(please rank in order of importance, 1 - most important, 10 - least important)

	1	2	3	4	5	6	7	8	9	10
* Enforcement of the existing Directive for example by more frequent audits by the Commission in Member States and taking legal action in case of non-compliance	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Use of new technologies and innovations such as precision farming	<input type="radio"/>	<input checked="" type="radio"/>								
* Use of more pest-resistant crops that could help to reduce the use and risk of chemical pesticides	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>				
* Training and guidance for pesticide users to reduce the use and risk of chemical pesticides	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>							
* Availability of less hazardous and non-chemical pesticides on the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Collect data on the use of pesticides in the EU	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>					
* Inform and educate EU citizens about the risks and potential harmful effects of pesticides	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>						
* Measures to protect the aquatic environment and drinking water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Restrict the use of pesticides in certain public areas like parks, nature reserves and others	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Introduce economic measures (e.g. tax, price increase) to reflect the cost of the pesticides' potential negative impact (e.g. on water quality, on human health and on biodiversity) in their price	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Precision Agriculture/Farming involves the use of automation, remote sensing, information and communication technology and other technologies to improve the efficiency of key agricultural management practices by targeting specific areas or crops.

Biodiversity refers to the variety of life and its processes and is closely associated with ecosystems and habitats. Agricultural biodiversity includes:

- all components of biological diversity of relevance for food and agriculture
- all components of biological diversity that constitutes the agro-ecosystem

In your view how effective would the following options be to reduce the use and risk of chemical pesticides in the EU :

(1 - most effective, 10 - least effective)

	1	2	3	4	5	6	7	8	9	10
* Introduce economic incentives and stimuli for the application of integrated pest management by pesticide users and other alternative methods for pest management	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Promote the expansion of organic farming in the EU	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the price of more hazardous chemical pesticides to discourage and reduce their use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Restrict access to more hazardous chemical pesticides for example by introducing a prescription-like system to purchase them	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Set stricter rules for the use, handling and disposal of pesticides including the recycling of empty containers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Reinforce Commission oversight of the implementation of Member States' National Action Plans on the sustainable use of pesticides, including penalties for underperformance	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Promote information on the existence and availability of low-risk and non-chemical alternatives to more hazardous chemical pesticides	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>* Introduce more detailed labelling or colour codes on pesticides packaging to inform users and purchasers on the hazards they may pose to human and animal health and the environment</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>				
<p>* Increased sampling and inspection of food produced in the EU for traces of pesticides</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>* Increased sampling and inspection of food imported from outside the EU for traces of pesticides</p>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>				

In general, what do you think would be the impact of achieving the [Green Deal and Farm to Fork strategy](#) objective to reduce the use and risk of pesticides in the EU on:

	a major improvement or increase	some improvement or increase	no change	some dis-improvement or decrease	a major dis-improvement or decrease	don't know /decline to answer
* Quality of food produced in the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Quantities of food produced in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Affordability of food produced in the EU	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Safety of food produced in the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* EU food security	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Quantities of food imported from outside the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Incomes/profitability of EU farmers, foresters and horticulturalists	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Ability to control pests in the EU	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Public health of citizens in the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Biodiversity in the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Water quality in the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Your opinion matters. Please, upload here any document/position paper that you would like to share with us.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

## **Contact**

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