

Analysis of the documents

The German presidency neither asked questions to the Member States nor included any reference in the proposal for draft Council Conclusion regarding the 50% pesticide reduction targets proposed by the European Commission in Farm to Fork and the Biodiversity Strategy, despite the Commission report mentioning that specifically.

A few Member States are trying to improve the German presidency text as follows:

- France is proposing to link the SUD revision to the discussions on the quantitative use targets, but proposing to use as indicator the controversial indicator (Harmonised Risk Indicator 1, HRI1). Lithuania, Ireland and Portugal refer to the Farm to Fork in their reactions recognising that changes are needed.
- France, supported by Sweden, proposes to expand the scope of the SUD to also target pollinators in the upcoming revision of the use the SUD.
- Denmark is highlighting the potential that pesticide taxation has as an economic incentive to reduce pesticide use.
- France agrees with the European Commission about the poor monitoring of IPM and that there is still a significant potential to reduce risk through the wider adoption of IPM practices including the more widespread adoption of non-chemical pest control techniques.
- France explicitly mentions the potential of agro-ecology and calls on the EU to harmonise arrangements aimed at monitoring and controlling IPM implementation, this is echoed by Luxembourg and Austria calling for the SUD should be amended accordingly, proposing a common approach or an IPM baseline, to be respected equally in all the Member States.
- Portugal recognises that IPM elements of the SUD are considered as statutory management requirements of the future Common Agricultural Policy (CAP) and that relevant IPM indicators are progressively included as part of the common conditions that farmers should comply to benefit from direct payments under the various income support schemes, while France recognises that possible extra charges due to implementation of IPM, different tools could be mobilized, including the incentives of the CAP.
- Latvia and Sweden call on the European Commission to collect and compile the results of research projects on sustainable plant protection to promote widespread application.
- Luxembourg mentions that criticism of HRI1 should be taken into account and that the trend of decreasing risks as shown by the HRI1 is not due to changes in actual PPP use patterns, but to the non-renewal of approval of active substances that meet the cut-off criteria; meaning that the target of 50% risk reduction by 2030 could therefore be met by simply further withdrawing or not renewing the approval of such active substances, without any change in PPP use patterns and all member states, recognise the importance of further developing the indicators to measure the quantitative use targets.

Instead a number of Member States are watering down the text:

- Netherlands, supported by Austria, argues that uptake of alternatives is always more expensive- Aside from the fact that farmers can be compensated within the CAP, alternative practices might seem like a cost in the short run, but over time can become a benefit.
- Denmark points at precision farming – rather than agronomy – as the key in the IPM implementation. This is supported by Portugal even asking to *'further discuss the*

appropriate legal frame of precision agriculture technologies such as the use of drones in the application of plant protection products and work towards demonstrating that the use of low flying drones is an effective mean of reducing exposure and environmental risks in comparison to other aircrafts’.

- Majority of Member states focusing on productivity rather than on farmers income and negative externalities in the pesticide debate, illustrated by the Slovenian arguing ‘The farmers economically dependent on yield cannot risk the loosing of crops if there are no efficient alternatives to be used’.
- A number of Member States defend themselves as a result of an audit rather than actually engaging in the debate, ex. Greece argues that it takes time to develop the needed supported structure able to accompany farmers in the ecological transition
- Finland, supported by other Member States, argues for need for further research rather than pointing at the many non-chemical alternatives that we already know today but are still not fully implemented.

GLOBAL 2000 and PAN Europe have carried out a fact-check of the arguments put forward by the Austrian Ministry of Agriculture against the Commission proposal: As a result, none of the arguments stood up to closer scrutiny.

For example, the Ministry of Agriculture claims that ,‘Targets have to be realistic and many are not comparable with those of other member states’, giving the example that as ‘Austria has a very high percentage of biological farming. To increase this percentage by as a high a margin as member states with a much smaller percentage is virtually impossible.’

But in reality the Commissions goal is help the EU’s organic farming sector to grow, with the goal of 25 % of total farmland being used for organic farming by 2030. So, for countries having with a higher percentage of organic this objective will be easier not more difficult to reach.

