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WORKING PAPER

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CONTRIBUTION

From:	General Secretariat of the Council
To:	Working Party on Agricultural Questions (Pesticides/Plant Protection Products)
Subject:	Report on Directive 2009/128/EC - AT comments

Delegations will find in Annex comments from Austria on the Report on Directive 2009/128/EC.

AT Comments on the Report from the Commission to the European Parliament and the Council On the experience gained by Member States on the implementation of national targets established in their National Action Plans and on progress in the implementation of Directive 2009/128/EC on the sustainable use of pesticides - Presentation by the Commission (Andrew Owen-Griffiths)

The following comments are to be seen as the first general statement from Austria. We reserve the right to make additional and detailed comments in the foreseen working groups as soon as further and concrete proposals from the European Commission are available.

We acknowledge that Austria was amongst one of the member states that reviewed their NAP in time and that the reviewed NAP overall meets the targets of the SUD. The Commission identified some points in the current NAP that – in their view – need addressing. Austria has recently started the process to review the current NAP, which is valid from 2017 – 2021 with the aim of finishing the review by the end of 2021. One of the major points of this review will be to address the “weak points” identified by the Commission, i.e. measurable targets and IPM.

As for measurable targets, we would nevertheless like to repeat our concerns brought forward during the Commission audit in February/March 2019: Targets have to be realistic and many are not comparable with those of other member states. For instance, Austria has a very high percentage of biological farming. To increase this percentage by as high a margin as member states with a much smaller percentage is virtually impossible.

As for the implementation of IPM in the NAP we – like other member states – want to repeat our view that a common approach on how to do it would be appreciated. There are no guidelines from the Commission in this regard, despite repeated requests by the member states. However we acknowledge the efforts the Commission has set so far, like the working group on IPM in May 2019 and would appreciate continuing efforts in that field.

Another point concerns the REFIT process of the SUD and the targets in connection with “Farm to fork”: We would appreciate a roadmap for both. This might be essential in the ongoing work of reviewing the NAP as some of its points might need addressing if the basic rules change.