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WORKING PAPER

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CONTRIBUTION

From:	General Secretariat of the Council
To:	Working Party on Plants and Plant Health Questions (Pesticides/Plant Protection Products)
Subject:	Proposal on a Regulation of the European Parliament and of the Council on the sustainable use of plant protection products and amending Regulation 2021/2115 - comments from Austria

Delegations will find in annex the Austrian comments on Chapter II of the above proposal.

Dear colleagues,

we'd like to thank the presidency for the opportunity to further discuss the calculation methodology of the reduction targets. The latest discussions in the meetings on the 12th and 13th of September showed the urgent need, but also the willingness of member states to further discuss and improve on the methodology.

However, we do have to point out the very restrictive timeframe that is given to the member states to propose a new methodology. We recognize the difficulties that are involved in the creation of an indicator which can adequately reflect the risk arising from the use of plant protection products. Furthermore, when setting national reduction targets, it is important to correctly consider national characteristics such as the crops grown and the weather conditions, thus ensuring a fair basis for comparison between Member States.

It is important to highlight the fact that member states are faced with a very limited amount of available data. They are mainly restricted to their own states data, therefore it is rather difficult to assess the effects of possible proposals on other member states.

We further recognize the lack of data on the actual PPP usage and that an indicator using data on PPP's placed on the market will always be a compromise.

AT proposals for the calculation methodology:

- The most important subject for Austria is carbon dioxide, which is approved as active substance according to EU-Regulation 1107/2009. Currently, there are only authorisations for plant protection products containing this active substance in the EU in Germany and Austria. The high quantities of carbon dioxide placed on the market - currently more than 2000 tonnes in Austria out of a total active ingredient quantity of about 5000 tonnes leads to a distortion of reality. The active substance is only used in closed rooms and containers for the treatment of stored goods, and not in the primary production. The application does not cause any residues and, considering a proper application, bears almost no risk for the user or the environment. Due to the characteristics of CO₂, it is often not included in international statistics on active substances. We therefore advocate for CO₂ to be classified as non-chemical active substance not to be included in the calculation.
- A refinement of the indicator is to be considered. The inclusion of application rates per hectare may be a viable step to display plant protection intensity more accurately. Clarification of the data used would hereby be necessary.

- The inclusion of application rates per hectare may also address the issue of the increased usage of PPPs requiring higher amounts of active substance per hectare and shorter application intervals.

As we want to highlight the importance of these discussions and see the further need to assess the problems and possibilities together with other member states experts, as well as the commission's experts, we would also like to bring forward the suggestion for the establishment of a commission-working group.