

# THE SUR GAP

*An illustration of the gap between the political rhetoric of the ENVI Committee of the European Parliament and the reality on the ground as faced by the farming communities on the proposed reduction in the use of plant protection products (SUR) in Europe.*



The illustration depicts a deep chasm between two worlds. On the left, a dark, jagged rock formation represents political ambition, with a man in a suit and a woman in business attire standing on its edge. The woman is holding a red box labeled 'SUR' and pointing towards the gap. A large red exclamation mark is positioned above the box. In the background, a city skyline is visible. On the right, a similar dark rock formation represents the reality of farming, with a man and a woman in work clothes standing on its edge. A large red question mark is positioned above them. In the background, a rural landscape with a tractor and trees is visible. The gap between the two formations is a bright blue chasm.

**Achieve  
our  
ambition!**

**How ?**

# THE SUR GAP

Reducing the use of Plant Protection Products (PPPs), is an objective shared by everyone in Europe. **The question is not IF, but HOW to sustainably reduce the use of these substances**, whether chemical or organic, and what to replace them with.

For farmers, this is a major challenge, since the effects of climate change are also rapidly changing crop protection needs in the face of new pests and fungal attacks. Keeping crops healthy while minimising the use of PPPs is at the core of agricultural thinking. It affects many aspects of farm work, including yields, working hours, variety selection, crop rotations and farm competitiveness, all of which have an impact on prices, production, imports and, ultimately, part of our food security!

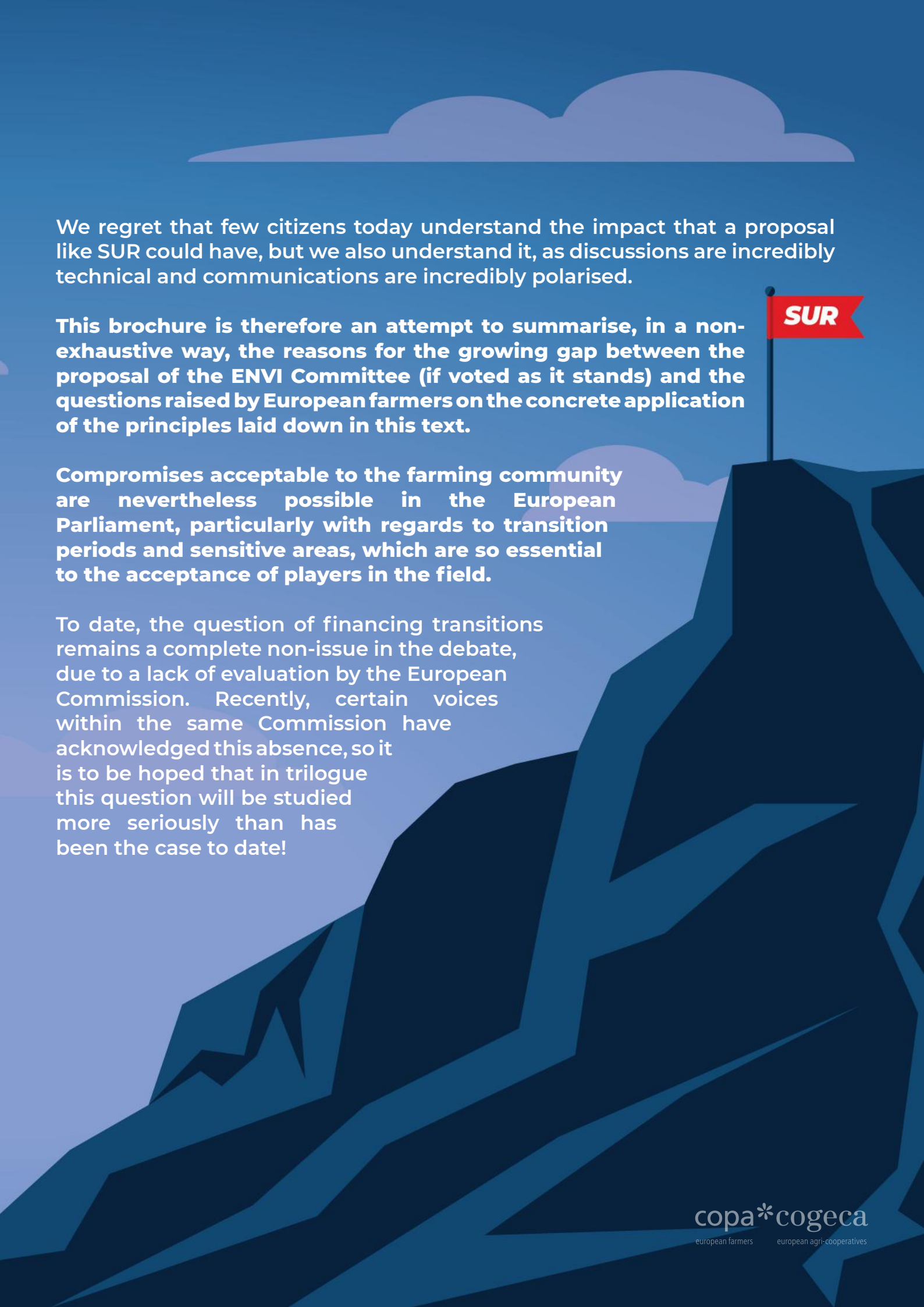
It's easy to understand why these strategic issues are a milestone of the European debate. **The Proposal for a regulation on the Sustainable Use of Plant Protection Products (SUR) was announced in 2020 with the launch of the Farm to Fork Strategy, with a flagship target of a 50% reduction in plant protection products by 2030.** Expectations were high among farming communities, who were hoping for concrete details on technical measures, alternatives and a financial framework that would accurately assess the cost of transition.

The reality was bitter, **the Commission's proposal never got beyond the stage of political intentions, creating an unprecedented gap between the stated ambition and the weakness of the proposed measures.**

As part of the European co-decision process, the European Parliament's Environment Committee (ENVI Committee) was empowered to amend the Commission's proposal. The result? **Instead of rebalancing the text, ENVI Committee MEPs decided to make it even more unbalanced and out of touch with on-ground realities.**

So, if the text, as it stands, was to be voted in plenary at the end of November 2023, and then confirmed in trilogue thereafter, we believe that the outcome of the several studies already published will confirm that: **many strategic agricultural sectors, in cereals, protein crops, fruit and vegetables will find themselves pushed to the edge of a cliff by the end of this decade, with cascading impacts that are hard to imagine.**





We regret that few citizens today understand the impact that a proposal like SUR could have, but we also understand it, as discussions are incredibly technical and communications are incredibly polarised.

**This brochure is therefore an attempt to summarise, in a non-exhaustive way, the reasons for the growing gap between the proposal of the ENVI Committee (if voted as it stands) and the questions raised by European farmers on the concrete application of the principles laid down in this text.**

**Compromises acceptable to the farming community are nevertheless possible in the European Parliament, particularly with regards to transition periods and sensitive areas, which are so essential to the acceptance of players in the field.**

To date, the question of financing transitions remains a complete non-issue in the debate, due to a lack of evaluation by the European Commission. Recently, certain voices within the same Commission have acknowledged this absence, so it is to be hoped that in trilogue this question will be studied more seriously than has been the case to date!

The introduction of targets for the reduction of Plant Protection Products (PPPs) was championed by the European Commission as a political flagship within the Farm to Fork Strategy.

The ENVI Committee has decided to push it even further with its vote in October 2023.

In fact, **ENVI Committee MEPs voted to require European farmers to reduce their chemical PPPs use by at least 50% and 65% for the most hazardous PPPs by 2030 with a baseline period (2013-2017).**

In addition to European wide targets, the ENVI Committee has confirmed the willingness to add **nationally binding targets**. If Member States were to try to ease the constraints, the ENVI Committee was of the opinion to give the European Commission the right to revise the targets and ambitions sent in by Member States.



# EU TARGETS

**What realities lie behind these targets for farmers?** Such objectives at EU level will have a serious impact on sectorial yield, farming practices, prices, competitiveness, imports and ultimately on the EU's overall food security.

**As incredible as it seems, no studies have been carried out on the targets proposed by the ENVI Committee, making them purely a political totem, that is out of touch with the European agricultural reality!**

In the case of transition, experience shows that the period for changes is crucial to its success. The ENVI Committee decided to keep 2030 as the objective. **Without any serious impact study, was 2030 chosen because it was a round number?** If enforced in this way, this would leave EU farming communities with just a few years to drastically rethink their cultivation method. For many cereals, protein crops, fruits and vegetables productions, with no compensatory alternatives or funding to date, **if such a transition period were to be adopted, the question would be simple: is it still worth the cost of producing?**

There's no need to explain that the mandatory national targets level coupled with an overall unrealistic implementation period (and further regulations resulting from the Green Deal/Farm to Fork) will create de facto an extremely difficult environment for farmers and national public administrations limiting flexibility in an ever challenging global context.



To be coherent with its reduction targets, the ENVI Committee proposed to accelerate the authorisation procedure for alternative such as low-risk PPPs and bio-controls.

**With the same logic, the ENVI Committee proposed the Commission to fix an EU 2030 target for the overall sales of biocontrol and low-risk PPPs.**



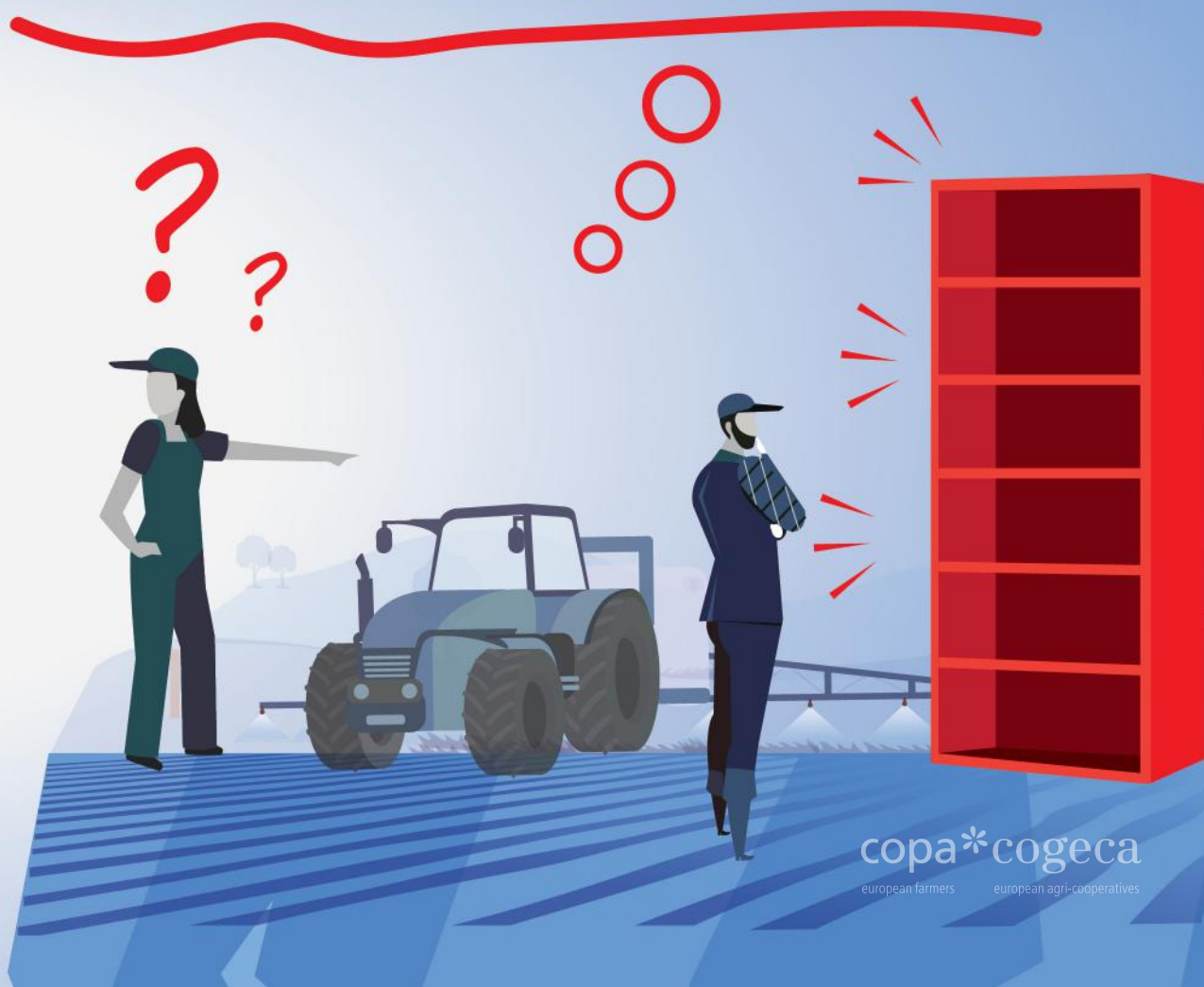
# ALTERNATIVES

Alternatives to chemical PPPs is a key point in the debate. Thus, it is a relevant move from both the Commission and Parliament to push Member States to dedicate more means for the authorisation of those alternatives and to simplify the procedure in order to accelerate their authorisation. **However, from an end user perspective, the question remains: will it be enough to achieve the targets by 2030?**

It takes on average 11 years to develop new phytosanitary products. If one focuses on alternatives such as bio-control products, only 6 to 7 new bio-control products have been brought to market every year since 2011 on average.

Since 2017, the new bio-control substances do not compensate for the conventional substances that EU farmers are already losing due to stricter risk assessments for reauthorisation. **The annual number of bio-control products authorised will hopefully increase with the streamlining of the authorisation procedure, but not enough to compensate by 2030! This is also why time for transition matters so much.**

In addition, alternatives like bio-control products mainly focus on specific crops (like gardening, viticulture, arboriculture) leaving other crops (cereals, arable crops or horticulture) with too limited options. Finally, even for the crops for which bio-control substances exist, most of the time, they need to be used together with conventional PPPs in order to be efficient.





# FINANCIAL SUPPORT

The ENVI Committee clearly considered that **farmers should be financially supported in complying with the obligations under SUR**, and compensated for costs incurred, and income forgone, by introducing Integrated Pest Management (IPM).

To support farmers in reducing the use of chemical plant protection products, **the ENVI Committee is asking Member States to consider as many funding sources as possible available to them, including EU funds and national contributions as well as state aids.**

**Additionally, by the end of December 2026, the ENVI Committee is asking for the Commission to propose the creation of a new EU funding instrument for the transition and adaptation of agriculture in the future Multiannual Financial Framework (MFF).**

**SUR Ambition**







It is a fact acknowledged by all: requested transitions will have significant financial costs. **The intentions of the ENVI Committee are therefore laudable, but the concrete questions that farmers are expecting answers from are more precise: what is the financial scale of the SUR transition? How will the cost of this transition be shared out?**

As no impact study has been carried out to date, the question of the cost of this transition has not been quantified and can therefore not be discussed in more detail, resulting in a proposal that remains very vague on this fundamental point!

**The European decision-maker's reflex was to consider the CAP budget as a means of achieving this objective. It is forgetting that CAP funds cannot be repeatedly squeezed for every new EU initiative proposed.**

It is with this understanding that one can see why the AGRI Committee, the competent one on this specific matter, deleted any references to CAP fundings.

**With the same logic, by pointing out Member State funds and national contributions to finance, the magnitude of the requested transitions are very general references without any budgeted approach.**

So here we are today, with a proposal for which part of the financing could be decided... in December 2026, according to the ENVI Committee's proposal.

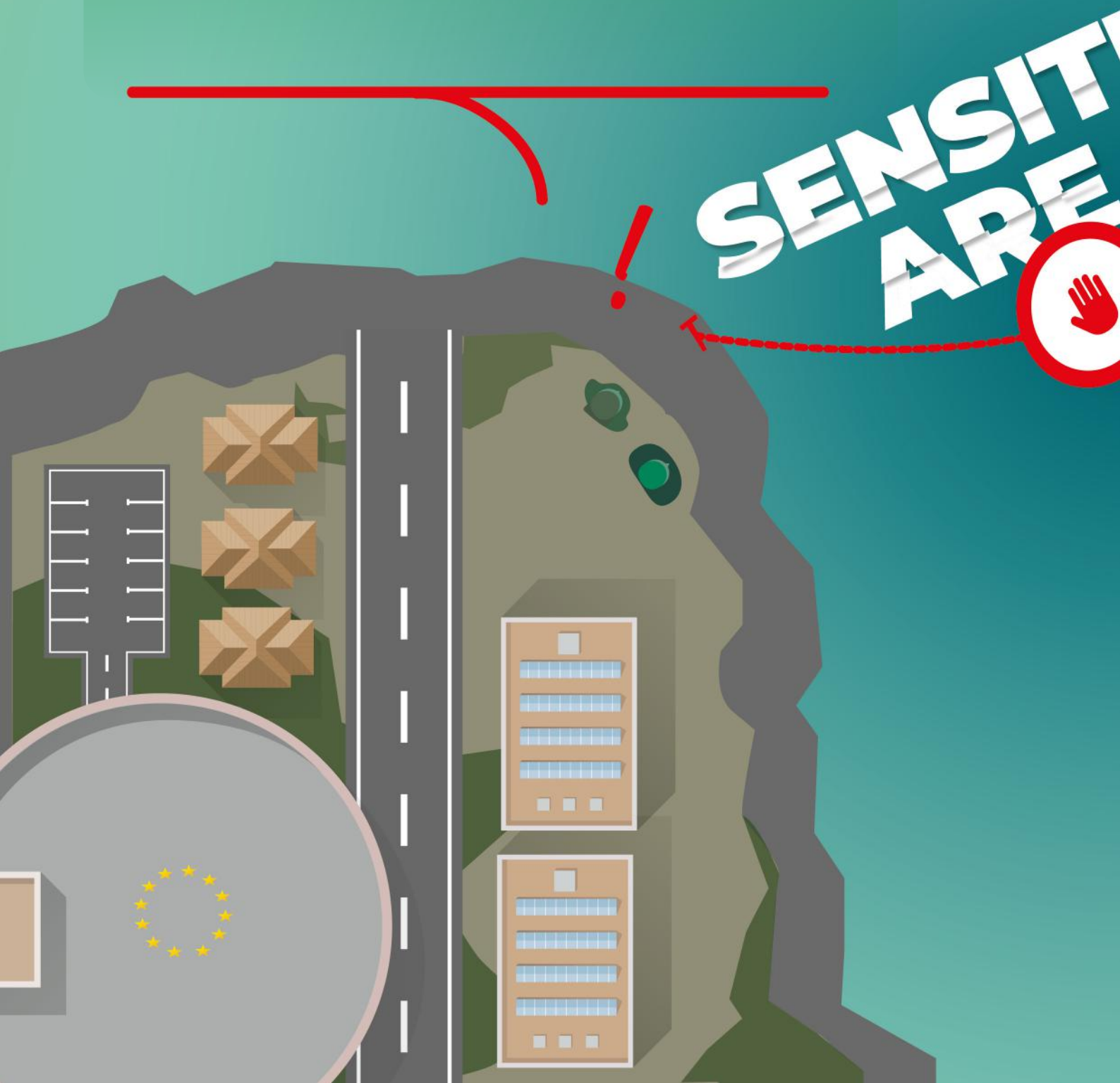


## **SUR Support**

The question of how to define sensitive areas has been the subject of intense debate and rightly so.

The ENVI Committee decided to adopt an approach in which all areas defined as sensitive under the Habitat and the Bird Directives will be considered not-fit for PPPs usage, including low-risk substances with the exception of bio-control and organic PPPs.

Additionally, the ENVI Committee also proposed, along with the Commission, that “all areas that will be defined in the future as sustaining pollinator species being threatened” as sensitive areas.



A stylized map of Europe is shown in shades of green and blue. The map is overlaid with several icons: three red circles containing a white hand with a red palm, indicating restricted areas; a red question mark; and several green bushes. A red arrow points from the text 'SENSITIVE AREAS' on the left towards the map. The background is a dark teal color with a grid pattern in the top right corner.

**SENSITIVE AREAS**

**Once again, no Europe-wide study has been carried out on the ENVI Committee's proposal to determine how much surface area would be impacted and how this would be distributed between Member States!** For Germany, if we take the areas protected under the Habitat and Bird Directives, one will consider that it will be about 19% to 25% of the agricultural land. In Slovenia, it is about 50% and 6% in France. Disparities could also be massive between regions within the same state. For example, if it's 6% of all of France's agricultural land that could be considered as sensitive areas, in some regions, it could as high as 35%.

In Germany, a recent study estimated that a ban on using chemical PPPs would result in a yield reduction of -30% for winter cereals, -40% for rapeseed and a minimum of -30% up to a total disappearance for the vegetables sector!

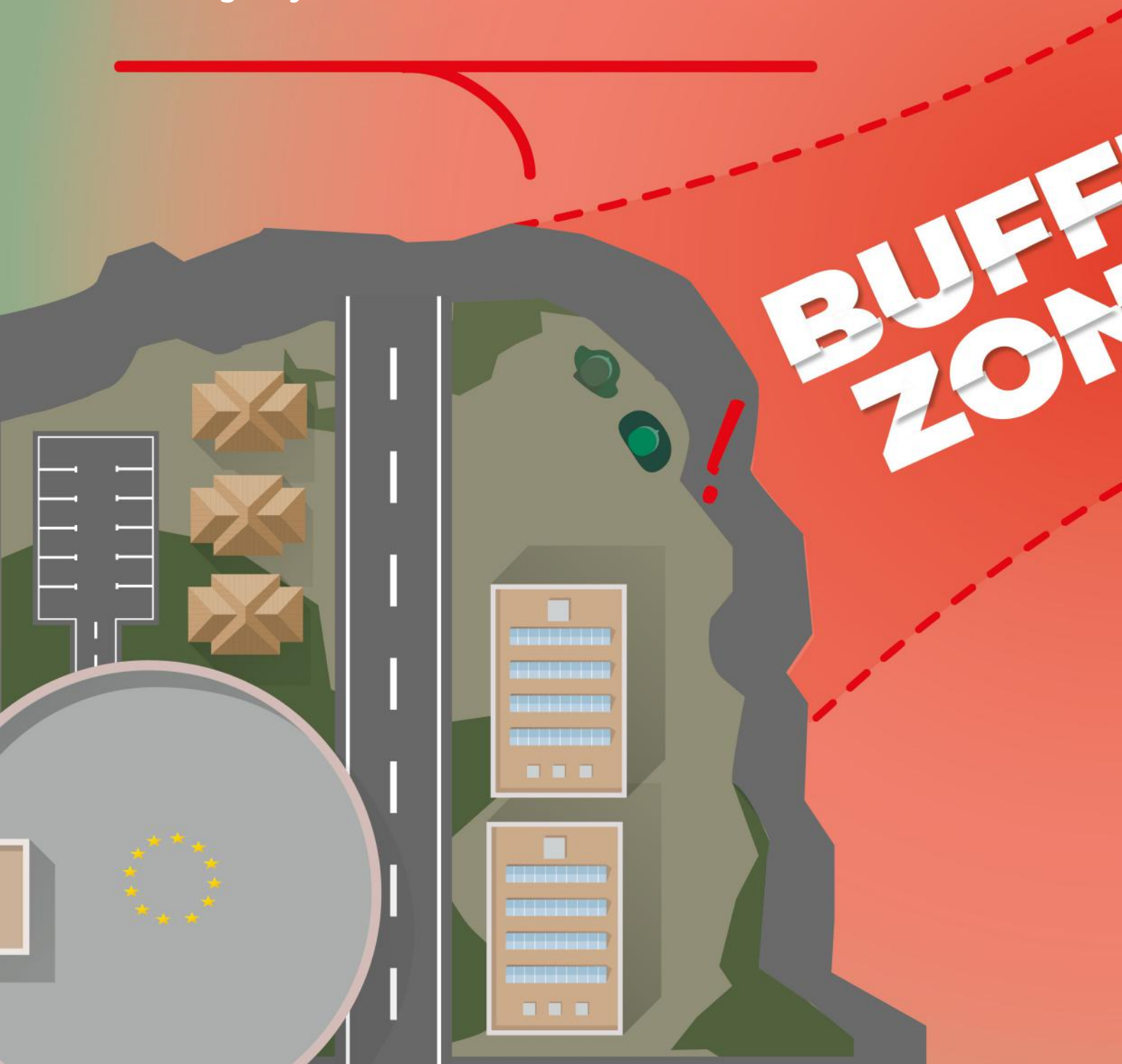
The situation is even more hazardous when adding to this the areas sustaining pollinators under the threat of extinction as... **they have not yet been defined! Is there any EU decision maker that today knows the actual impact of the SUR proposal for farmers having lands under sensitive areas? No.**

The ENVI Committee approach also makes little sense from an agronomic perspective as most bio-controls are used in combination with traditional PPPs! By totally banning their use in sensitive areas, the stark reality is that for many farmers, under current conditions, this means no alternative. Finally, the fact that a PPP is organic does not mean that it represents less or more risk for the environment and human health!

The non-treatment of buffer zones is an important issue that the ENVI Committee has decided to address in a two stage approach:

The ENVI Committee decided that buffer zones should be extended to 5 metres around areas used by the general public or vulnerable groups.

The ENVI Committee decided to follow the Commission's initial proposal to put a **mandatory buffer zone of a minimum of 3 metres around all ecologically sensitive areas.**





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Some Member States have already implemented restrictions of PPPs usage near places open to the general public, and farmers are taking a number of measures, such as planting hedges or night spreading. European harmonisation on this subject might prevent dumping between Member States. **However, has the SUR proposal voted in the ENVI Committee quantified these financial consequences? As for the other aspects of the text, the answer is: no!**

On the subject of 3-metre buffer zones around sensitive areas, practice has also shown that some Member States have encountered numerous problems. In some countries, plots of land bordering a watercourse or a Natura 2000 area can be dozens of meters wide. **A 3-metre ban on the use of PPPs in such areas would, in practice, considerably reduce the amount of land farmed, with far-reaching consequences.**

**The ENVI Committee voted to require European farmers to fill an electronic only-use register for IPM and PPPs.**

Going beyond the Commission's proposal, MEPs required a minimum 7-year data storage regarding information that ranges from all the mitigation measures whether applied or not and their justifications, the reasons for the PPP application, the way it was applied and the quantity used, to the advisor's name and content of their advice.

**Furthermore, there is the requirement that an electronic record of each application of PPPs and a report on any aerial application must be stored for a period of at least 20 years and must be anonymised after 7 years.** The list of information to be provided has therefore been considerably extended.



# USE REGISTER

On paper, the proposal seems clear-cut, but its implementation much less so... When farmers have to carry out treatments, this is often weather-related, and they have to act quickly. Having to fill in an online register a priori can be stressful, complex and, above all, highly bureaucratic!

If the ENVI Committee's proposal goes through, **how will farmers manage in areas where internet access is limited? What about less tech-savvy farmers?** The one-year deadline for encoding information proposed by the ENVI Committee is not a sufficient response.

There are many IPM measures that farmers will have to demonstrate having considered or applied, including measures that are not relevant for them. **How much time will it take to undergo this extra administrative effort? Will advisors still accept to provide advices to farmers if their name and advices are exposed?**

Finally, nothing is mentioned in the ENVI Committee's proposal on the precise setting up of this platform. The European Parliament's AGRI Committee was so unconvinced by the idea of this online usage register that it proposed that it be scrapped altogether.



**The ENVI Committee proposed to apply a new calculation method for the establishment of the level of risk of a PPP.**

The ENVI Committee suggested a calculation method for Hazard Rate 1 PPPs (HRI) dividing the quantities of active substance by the mean application rate per hectare of that active substance and then multiplying it by the appropriate hazard weighting.

This is in contrast to the standard HRI calculation, which multiplies the quantities of active substances placed on the market by their corresponding hazard weightings.

# HARMONIZED METHOD





# REDUCED RISK TECHNOLOGY



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Why such a technical change?

The active substances for which we need to apply more quantities per hectare will be less risky than other substances with the same hazard level.

In practice, products that sometimes have a high hazard weighting, and are applied in big quantities per hectare, are organic PPPs.

Should we disregard the hazard level of a product because it is classified as chemical or organic? The logic at stake seems, in the end, more political than agronomic!



As part of the registration in the independent advisory system, **independent advisors shall declare in writing that they have no direct or indirect interests in an undertaking involved in the manufacturing, distribution or sale of PPPs.**

Moreover, farmers will have to meet an advisor on an annual basis for the purposes of receiving strategic advice. The ENVI Committee proposal includes the possibility for professional users to deviate, in justified cases, from the time interval and, for more flexibility, to organise strategic advice collectively at farm-level.



# INDEPENDENT ADVISOR

Once again, the ENVI Committee text is going beyond the Commission's initial proposal. Avoiding conflicts of interest between advisors and retailers of PPPs is understandable. **However, what exactly is an indirect interest in the intention of the ENVI Committee?** Is there a precise definition? Nothing is specified.

Behind this request, this is also the role of cooperatives in advising its members that are in question. Farming cooperatives must prove in writing that they have no direct links in undertaking the selling or distribution of PPPs. **As a consequence, there is a real possibility that they will end up filling out paperwork all day instead of providing quality advisory services.**

The obligation to meet an advisor could be understandable but the rigidity of the approach also raises the following questions: **how can we prescribe to farmers how often do they need to receive advisory services? Do we really have all the available advisory services ready to be delivered on an annual basis across EU Member States?**





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