



Brussels, 11 October 2023

To: EU ministers of agriculture, environment and health

Subject: European Commission proposal for a Regulation on the Sustainable Use of Plant Protection Products (SUR) - Public opinion poll on pesticides, EU and national pesticide reduction targets, HRI-1

Dear Minister,

We are writing to you ahead of the next meeting of the Working Group on the Sustainable Use of Plant Protection Products Regulation (SUR) proposal to inform you about the recently published results of an IPSOS citizens' opinion poll regarding pesticide use, and share with you our views on reduction targets and indicators.

1. The report [Play it safe!](#) considers EU citizens' opinions regarding different aspects related to food production, farming and pesticides, e.g. climate change, the environmental and human health impact of pesticides, the need for binding agronomic measures, conditionality of agricultural funding and application of the precautionary principle. Citizens' opinions were collected in six Member States covering different zones of the European Union (DN, FR, DE, PL, RO, ES) with the market research agency Ipsos. The results indicate that respondents across the EU are concerned about the use of pesticides and their effect on health and the environment. When considering the risks, citizens are in favour of a precautionary approach in the process of approval of the use of pesticides (glyphosate included). Three in five respondents think that farmers should always use methods for preventing or controlling pests and diseases that carry the least risks, or else lose access to EU financial support. As many as 73.2% of respondents are in favour of implementing mandatory IPM rules for farming. Regarding the buffer zones, 60.8% of citizens are strongly in favour of large protective zones, over 50 m. Citizens also express different levels of trust in the national government when it comes to decisions on pesticide use. **Overall, the poll voices citizens' urgent need for ambitious goals to protect their health and the health of the environment.**

2. Looking back at the development of the SUR negotiations and the often-used food security argument^{1,2}, attention must be drawn to the science-based facts that point unequivocally to the claims that long-term food security is linked to the preservation of biodiversity^{3,4}. Biodiversity, according to the indicators, is significantly threatened due to the use of pesticides. The opposition to reduction targets will inevitably lead to non-compliance with the European Green Deal goals, which will exacerbate the galloping problem of biodiversity loss, and will end with an unsolvable food security problem. This is not what citizens want - they are, aligned with science, in favour of preserving the ambitious pesticide reduction goals, using the least harmful farming methods and mandatory cropping rules. In addition to the poll, EU citizens raised their voices in the ECI [Save Bees and Farmers](#), asking for an 80% reduction in pesticide use until 2030 and a full ban on synthetic pesticides until 2035, more than the Commission proposed.

3. Harmonised Risk Indicator 1 uses the data on sales of active substances in kg/ha, and multiplies it with a crude Weighting Factor which gives a false picture of the actual risk that active substances, in particular those efficient in small doses, pose to the environment and human health. In addition, when an active substance loses its approval due to its toxicity, the indicator unfoundedly shows a decrease in the risk, as this substance receives, retroactively a much higher weighting factor. Proposals on improving the existing indicator exist, e.g. including a normalisation step that takes into account the different hectare application rates, as also provided for by pesticide indicators such as [NODU](#), or the one developed by [Umwelt Bundesamt](#), as well as the Danish [Treatment Frequency Index](#) (TFI). Moreover, the categorisation in the 4 risk groups should be improved, in particular regarding group 4 (weighting factor 64), which momentarily leads to arbitrary allocations of risk, as this group can include a variety of different substances (candidates for substitution or low-risk), and can lead to seemingly large and retroactive reductions in risks, also when no real change in practice takes place (e.g. when a substance is banned). **The improvement of the existing HRI-1 is urgent and essential to achieve EGD goals and to efficiently protect human health and the environment.**

We invite you to take into account the above-mentioned arguments and to listen to the demands of citizens by advocating for ambitious goals to reduce the use of pesticides and by preserving strong SUR provisions.

¹<https://www.iddri.org/en/publications-and-events/blog-post/war-ukraine-and-food-security-what-are-implications-europe>

²<https://www.spglobal.com/commodityinsights/en/market-insights/latest-news/agriculture/011222-russias-my-2021-22-wheat-exports-lose-momentum-down-18-on-year>

³https://commission.europa.eu/system/files/2023-01/SWD_2023_4_1_EN_document_travail_service_part_1_v2.pdf

⁴ <https://www.inrae.fr/actualites/biodiversite-services-rendus-nature-que-sait-limpact-pesticides>

We take this opportunity to once again request a meeting with you to discuss and exchange thoughts on key elements of the SUR.

Thank you for your time and consideration.

Yours sincerely,

Natalija Svrtan, Campaigner, Agriculture and Pesticide Free Towns, PAN Europe - natalija@pan-europe.info

Kristine De Schamphelaere, Policy Officer Agriculture, PAN Europe - kristine@pan-europe.info