

The Green Deal, the Farm to Fork Strategy and biodiversity

- The reversal of biodiversity loss was recognised as one of the specific priorities of the new CAP proposal, and the identification of measures addressing biodiversity losses in all species is an essential element of MS Strategic Plans. Approaches to address this however differ.
- Isolated (area based) targets may have significant economic and political consequences
 - The proposed target would decrease EU cereal production by an estimated -15%.
 - The EU would have to import more, with the risk of biodiversity loss in third countries, and export less leading to price increases in particular in North Africa, these countries becoming dependent on imports from Ukraine and Russian
 - EU food prices may raise, resulting in a public debate similar to the effect of biofuels on food security. Based on a comparison of arable land taken out of production, we expect the area impact the current targets to be 4 to 5 times higher than that of biofuels.
- A holistic approach towards the management of all land seems to offer solutions that deliver with respect to biodiversity and at the same time consider the other dimensions of sustainability. In that respect the new green architecture of the CAP includes a compulsory enhanced conditionality applied on all of the agricultural area receiving CAP support complemented by voluntary incentives measures under Pillar I (eco-schemes) or Pillar II (management commitments, etc.). Based on the best data available the following could be proposed to replace the current targets:
 - **Landscape features: doubling of the current area with landscape features**, oblige MS to include in 50% of rotational fallow land biodiversity-enhancing measures and **ban any conversion of permanent grassland in protected area**;
 - **Organic agriculture**: initiatives that **promote the consumption** of organic products with the aim to **double the size of organic production area**. The demand is strong in fruits and vegetables, not necessarily in the big arable crops.
 - **Pesticides**: better target the use of pesticides through a **strategy of providing alternatives and enhancing the introduction of alternative pest management**. This could be developed in the Farm to Fork Strategy
 - **Fertilizers**: a strategy for improving soil nutrient management to **reduce the excess of all nutrients** (both from mineral and organic fertiliser) over all the agricultural areas. The target could be to **reduce the surplus by at least 50% by 2030**

1. The overall approach for the transition towards sustainability in the agricultural sector

- The Farm to Fork Strategy reflects the concrete reality of an on-going major transformation of food systems worldwide. The EU experience is pertinent because policy- and private-driven initiatives demonstrate that **sustainable best practices can be successful in jointly increasing economic and environmental/climate efficiency**.
- The EU experience is pertinent because, in many areas throughout the food chain, bottlenecks (e.g. access to knowledge, investment needs, risk management tools) hamper the generalisation in the use of such practices.
- **Agriculture plays a major role in the Green Deal by managing 50% of EU land surface**, capturing but also emitting carbon and other GHGs, being affected by and needs to adapt to climate change and using natural processes to produce food and other raw materials that are essential for our wellbeing. Obviously, the CAP is the policy that already has an impact in the above, and is asked to deliver much more in the future in improving its overall contribution to the Green Deal.
- **The question that is being asked is whether the CAP reform proposal is at the level of required ambition to transition EU agriculture to a sustainable system**. Most of this doubt and ex-ante criticism is not addressed to the proposal as such, as the Green Deal Strategy clearly identifies that Strategic Plans as the vehicle to introduce such ambition – rather, the doubt is on whether we could have a repetition of the “greening” experience with co-decision watering down the initial level of ambition.
- **The ambition to make the EU food system more sustainable is reflected in the priorities and CAP objectives set**, and the whole analysis underpinning the IA. In it, climate change is considered as the catalyst that will drive policy reform and action around environmental, climate and biodiversity challenges are prioritised. **The issue is not whether, but how we best address these priorities**, with two distinctively different approaches proposed.
- The one chosen in the CAP is that of a **holistic, integrated approach on land use**, which has as its starting point the shift of the CAP towards more performance and uses an evidence-based identification of needs to strategically define actions linked to targets. In this, we address soil, air, water and biodiversity in tandem by **requiring land management to increase the level of ambition throughout all the territory**. Having evidence of the state of play of soil, air, water and biodiversity on all land has the advantage of prioritising exactly the actions addressing the specific problems identified by information, which is publically available, thus guaranteeing not just better transparency, but greater effectiveness and efficiency, and early stakeholder involvement in the design of MS and regional Strategic Plans.

- **A number of guarantees for the environmental and climate ambition are furthermore embedded in the proposal for a future CAP:**
 - An enhanced conditionality which, with a degree of streamlining, adds to the current environmental and climate rules under cross-compliance (GAEC and SMRs) and the current greening rules a few more important rules have been introduced under conditionality (the Water Framework Directive, the Directive on sustainable use of pesticides, two GAEC standards on protection of wetland/peatland and on nutrient management). This ensure that these rules will apply on a compulsory basis on all agricultural area, one of the asset of conditionality.
 - The conditionality rules will be complemented by voluntary eco-schemes under Pillar I and environmental and climate management schemes under Pillar II. The flexibility will give Member States the possibility to set attractive schemes, aiming at covering as much agricultural land as needed to eventually reach the environmental and climate objectives.
 - The CAP will need to be integrated with the environment and climate policy and specific quantitative thresholds will be set at EU level.
- The alternative approach **raises the level of ambition in specific parts of land with fixed and uniform budgetary or area targets**, it may also **set certain specifications in the EU legislation** ensuring thus a minimum ambition EU-wide, while taking stock of the wide area coverage of certain instruments (in particular certain GAEC under conditionality and eco-schemes). This could however attract the risk of criticism for applying the same a “one-size-fits-all” approach introduced with greening. The specific targets for area equalling 10% for set-aside and 30% for organic also reflects this approach and its risks.
- EU27 agricultural land roughly equals 160 mio ha, 59% for arable crops (including vegetables), close to 34% for permanent pastures and the remaining 7% for permanent crops. This distribution of agricultural land reflects very different needs and challenges affecting targets for landscape features, organic potential, fertilisers and pesticides.

2. Targets for landscape features

- The agricultural area with **landscape and non-productive features** is not known exactly, but is estimated to be **around 0.5% of arable land**. Area under non rotation set-aside, also very beneficial for biodiversity, is not known as is no longer counted under UAA ¹. Rural development also supports landscape features and not-rotational set aside. The main disadvantage of such a target is its rigidity. **In the EU allocating 10% of all land to landscape features will be excessive.**

¹ The current CAP imposes under cross-compliance a retention of landscape features and under greening an obligation to cover an area corresponding to a minimum 5% of Ecological Focus Areas on arable land, but this includes productive areas without pesticides and non-productive areas (including rotational fallow land) and landscape features and various exemptions. For detailed figures, see Annex table 1-2)

- An **alternative** approach could be envisaged:
 - Ensuring that all permanent landscape features contributing to diversity (hedges, wooded strips, trees, field copses, ponds, ditches, traditional stone walls) are adequately protected in all MS;
 - setting as a target to **double the area under landscape and other non-productive features** within the proposed GAEC 9;
 - oblige MS to **include in 50% of rotational fallow land biodiversity-enhancing measures** (such as field margins, bird-nest protection, melliferous crops);
 - under the “stricter protected” core areas in Natura 2000, **ban any conversion of permanent grassland in protected area;**
 - facilitate small farm area payments similar to the “one hectare initiative” for practices such as water retention, flood and soil erosion control, biodiversity shelter and connectivity.

- As regards the protection of grassland in Natura 2000:
 - Building on the experience to date (under greening certain permanent grasslands in Natura 2000 were already protected), the post 2020 CAP proposes to continue to apply certain measures aimed at protecting permanent grassland. At the basic level, via the future GAEC10 Member States will identify permanent grassland located in Natura 2000 sites where the ban on conversion or ploughing will apply, thus contributing to protecting valuable habitats and species associated with the these areas (see table 3 with data on the protection of sensitive permanent grassland inside Natura 2000 under the current greening obligation).

 - On a broader scale, given its carbon sequestration role, GAEC 1 will continue as a tool for maintaining permanent grassland based on the ratio system that provides farmers flexibility in converting such grassland to other users within a certain limit. It is expected that Member States mobilise additional tools based on voluntary participation of farmers to step up the basic levels of protection described above.

3. Targets on organic farming

- For **organic farming**, the **current EU-wide area coverage of 8%** masks very different MS supply and consumption patterns. The **fixed-area percentage of 30%** is not just **excessive**, but **ignores** the realities of a **strong, demand-driven expansion in fruit and vegetables**, a **steady but slow growth in permanent pastures** due to the relatively lower demand growth in both extensive beef and, in certain markets, milk, and the **limited supply response in arable crops**, where organic imports are increasing (Annex table 4).

- x Organic should remain demand driven to allow farmers to benefit from the premium price granted by the market. An artificial increase defined in advance would inflate excessively the supply, through excessive CAP support, and therefore sinking the organic market and the current margins enjoyed by the sector.
- x An alternative strategy would be to introduce a set of initiatives that promote the consumption of organic products (e.g. green public procurement) in particular to increase the consumption of organic food in public canteens, while the CAP support should be enhanced to catch up with the growing demand (the future CAP provides a 30% increase in CAP support for organic farming under the new CAP scheme) in order to double the size of the organic agricultural area

4. Combined production impacts of targets on landscapes and organic farming

- x The combination of setting 10% area in non-productive uses (sea-side and 30% in organic production) would have serious consequences in arable crop production, especially in cereals. Food waste (mainly characteristic of retail) lower demand for red meat is not relevant to this risk. The relevant factor is that cereal production would be reduced by roughly similar amounts due to less area from sea-side and lower yields in organic, creating two mutually exclusive pressures. Fish production would intensify in the remaining area, undermining the net effect of the strategy, or prices and imports would increase, while the strategically important North African market would be left with any EU wheat (see Annex table 5).

5. Pesticides and fertilisers

- x The reduction of pesticides should start from the recognition that plant diseases will not go away with climate change rather, they risk increasing. Therefore, the need to better target the use of pesticides is addressed with a combined strategy of providing alternatives to the most dangerous ones and enhancing the introduction of alternative pest management through new breeding techniques, biocontrols, IPM etc., and improving the monitoring of substances residues, including at farm level. Reducing the volume or value of a long set of very diverse substances is, from the point of view of public health, meaningless.
- x For similar reasons, fertiliser use, by addressing soil health, also requires a strategy for improving soil nutrient management with the optimisation of nutrients promoted by the introduction of a mandatory use of nutrient management by all farmers. Moreover, better implementation of the existing environmental legislation, and in particular a more prudent and smart approach in granting derogations, would be very effective also to enhance actions under the CAP. Again here a unified EU-wide quantitative target would fail to address the very different nutrient balance in MS and the simple fact that the

same fertiliser could be used in very different ways – from an irrational excessive level damaging the soil to an efficient, targeted way improving soil’s nutrient balance. Farm practices and soil health provide the indication of fertiliser use efficiency, not the amalgamated volume of sales of very diverse substance.

- Manure is costly to transport and process. In regions with high concentration of animal, therefore, manure can easily bring excess of nutrient (in view of the needs of the soil, the agricultural practice, the crop yield etc.) and therefore be the main source of pollution of water, air and soil. It may also contain chemicals from animal feeds that are also passed into soil. Moreover, while it has the advantage to enrich the soil in organic matter, its nutrients are less efficient; this is the reason why the Nitrate Directive sets limits per hectare of nutrients from manure. Excess of mineral fertilisers (as compared to the needs of the soil) also cause pollution.
- Therefore, in order to reduce pollution, **the excess of all nutrients** (both from mineral and organic fertiliser) over all the agricultural areas should be targeted.
- **Target:** the **Gross Nutrient Balance** could provide the right indicator to measure the excess. Reported by ESTAT, it is intended to be an indicator of the potential threat of surplus (or deficit) of two important nutrients (Nitrate and Phosphorous) in agriculture.²
- **The target could be to reduce the surplus by at least 50% by 2030**
- **How:** measures to reduce would include:
 - The stricter enforcement of the existing environmental legislation, especially in the most vulnerable areas;
 - A more widespread use of effective Nutrient Management Plan by farmers;
 - Interventions under the CAP: obligations set in conditionality (crop rotation, tillage management, no bare soil, buffer strips, protection of wetland and grassland); and incentives for extensification, precision farming, and other practices that would reduce the nutrients excess in the environment.

² Table 6 : The gross nutrient balance is calculated as the balance between inputs and outputs of nutrients to the agricultural soil. A balance per hectare of utilised agricultural area is also presented.

The Inputs are:

- Consumption of Fertilizers,
- Gross Input of Manure, and
- Other Inputs.

The Outputs are:

- Removal of nutrients with the harvest of Crops,
- Removal of nutrients through the harvest and grazing of Fodder, and
- Crop Residues removed from the field.

ANNEX

Landscape features definition

In the CAP legal framework there is no definition of landscape features as such.

Current GAEC 7 and in the future proposed GAEC 9) include in their definition (annex to the basic act) a list of **landscape features to be protected**: “ *retention of landscape features including hedges, ponds, ditches, trees in line in groups or isolated, field margins and terraces ..*”. The list is not closed and MS can expand it.

Under the current rules for EFA (Ecological Focus Area), a list of **eligible landscape features** is provided via a delegated act (Art 46 of regulation n° 639/2014) and covers: ***hedges, wooded strips or trees in line, isolated trees, fields copes (including trees, bushes or stones), ponds, ditches, traditional stone walls***. **Buffer strips and field margins** can be qualified as EFA but they are listed as another category, despite that they are considered as non-productive areas favourable to biodiversity .

Under the NDM, the Commission post-2020 proposal for eco-schemes and agri-environmental measures are not accompanied with precise definitions of (possible) eligibility conditions.

It should be mentioned that MS have some leeway to limit the list of the landscape feature to be protected under GAEC and to be qualified under EFA. For instance, **MS can decide to limit the scope of landscape features eligible as EFA to those that can be controlled easily**. Furthermore concerning EFA, **farmers do not have an obligation to report all their eligible area** and can choose to limit their declaration to what is necessary to comply with their obligations.

MS have an obligation to report on areas declared by farmer. **However, because of the flexibilities existing at both MS and farmers levels (see above), only a part of the actual landscape features are reported.**

As regards data for EFA, an annual monitoring has been established based on MS notification. The following table presents the breakdown of EFA declared in 2018 by farmer per EFA type including the share of landscape features, buffer strips and field margins, land lying fallow, green cover and nitrogen fixing crops. As a summary:

- reported **eligible landscape features (as defined in R. 639/2014) + buffer strips and field margins represented in 2018 3.1 % of areas declared under EFA.**
- as areas declared under EFA represented in 2018 13 % of total arable land at EU level, **reported eligible landscape features, buffer strips and field margins represented in 2018 0.4 % of EU arable land.**

Table 1: Quantification of non-productive areas and features by Member States

	UAA	Fallow land		Linear landscape elements		Fallow and landscape elements	
		Area	% of UAA	Area	% of UAA	% of UAA	Target 10%
1 000 ha	Eurostat 2018			JRC estimation excl. dubious cases*			
EU27	161 070	6 600	4.1	920	0.5	4.6	16 107
BE	1 337	9	0.7	10	0.7	1.4	134
BG	5 019	190	3.8	10	0.2	4.0	502
CZ	3 500	26	0.8	0	0.0	0.8	350
DK	2 628	23	0.9	10	0.4	1.3	263
DE	16 673	272	1.6	90	0.5	2.2	1667
EE	1 018	34	3.4	10	1.0	4.4	102
IE	4 463	3	0.1	40	0.9	1.0	446
EL	5 184	145	2.8	10	0.2	3.0	518
ES	23 795	3 100	13.0	40	0.2	13.2	2379
FR	29 088	477	1.6	100	0.3	2.0	2909
HR	1 505	15	1.0	10	0.7	1.6	150
IT	12 823	294	2.3	180	1.4	3.7	1282
CY	115	13	11.1	0	0.0	11.1	12
LV	1 950	317	16.3	10	0.5	16.8	195
LT	2 975	87	2.9	10	0.3	3.3	297
LU	131	0	0.2	0	0.0	0.2	13
HU	5 355	159	3.0	20	0.4	3.3	536
MT	12	1	9.3	0	0.0	9.3	1
NL	1 776	7	0.4	60	3.4	3.8	178
AT	2 596	45	1.7	10	0.4	2.1	260
PL	14 474	247	1.7	80	0.6	2.3	1447
PT	3 582	264	7.4	10	0.3	7.6	358
RO	13 396	415	3.1	40	0.3	3.4	1340
SI	480	1	0.2	0	0.0	0.2	48
SK	1 908	36	1.9	0	0.0	1.9	191
FI	2 280	256	11.2	120	5.3	16.5	228
SE	3 007	163	5.4	50	1.7	7.1	301

Note: landscape features considered here: grass margins, shrub margins, single trees bushes, lines of trees, hedges and ditches. Dubious cases refer to the difficulty to assess if one linear element belongs to agricultural area or not. In case of doubt, the JRC removed this element from the estimation. Numbers are to be taken with caution; additional work would be required to improve the quality of this estimate.

Source: Annex 5.4 of the SWD on Impact Assessment for the new CAP proposal 2020-2027; DG AGRI based on Eurostat and JRC based on LUCAS survey.

Table 2: Ecological Focus Area based on MS declarations (2018)

EFA Before WF - Year : 2018

	Land lying fallow	Land lying fallow melliferous	Terraces	Landscape features	Buffer strips and field margins	Agro forestry	Strips along forest	Short rotation coppice	Afforested areas	Catch crops	Nitrogen fixing crops	Miscanthus	Silphium	Total
Belgium	1.345	-	-	1.018	2.018	31	155	34	23	169.236	891	64	-	174.814
Bulgaria	81.433			41	276		356	163		92.534	126.030			300.832
Czech Republic	9.857	-	3	262	1.070	-	-	86	75	141.395	134.534	-	-	287.282
Denmark	32.902	187		779	1.618			2.862		227.792				266.140
Germany	209.900	15.036	1	28.390	21.021	-	1.030	1.548	630	946.989	81.917	835	1.241	1.308.539
Estonia	3.026	-	-	560	-	-	-	-	-	-	20.300	-	-	23.886
Ireland	302			14.839	1.497			31	103	1.018				17.789
Greece	42.147			119	113						51.958			94.336
Spain	633.169	99				-			7.567		176.907	-	-	817.742
France	325.309	2.761		57.134	37.523	26	5.854	929	469	1.597.950	328.984	2.228		2.359.166
Croatia	9.392			213	1.524		499	34		12.208	86.095			109.965
Italy	83.190	131	-	3.889	1.297	-	19	590	813	-	269.598	-	-	359.526
Cyprus	5.211	-	-	22	14	-	-	-	-	-	4.574	-	-	9.821
Latvia	37.310			3.234	1.732					9.029	19.903			71.208
Lithuania	109.237			115	93			3.517		61.554	264.601			439.116
Luxembourg	153	0	-	277	46	-	11	-	-	6.091	827	15	0	7.419
Hungary	90.092	-	-	683	430		171	484	9.333	242.171	158.684	-	-	502.048
Malta	2	-	-	-	-	-	-	-	-	-	15	-	-	17
Netherlands	-	-	-	159	862	-	-	16	-	204.475	5.101	-	-	210.614
Austria	8.084	655		9				228		14.507	5.319	195		28.996
Poland	61.086			4.093	1.572		908	2.398	2.280	660.279	189.500			922.116
Portugal	17.680			243							6.620			24.542
Romania			51	1.507	92			60	288	322.273	278.852	562		603.686
Slovenia	451		-	-	-	-	-	-	-	3.740	4.765			8.956
Slovakia	33.088		5	1.034	138			830		56.620	39.150			130.864
Finland	19.935			-				4			6.394			26.333
Sweden	57.952				-			2.654		46.178	15.916			122.700
United Kingdom	153.725	-	-	48.917	58.625	5	-	11	10	63.463	37.101	-	-	361.856
Totals EU	2.025.978	18.869	60	167.536	131.562	62	9.001	16.477	21.590	4.879.501	2.314.535	3.898	1.241	9.590.310
	21,1%	0,2%	0,0%	1,7%	1,4%	0,0%	0,1%	0,2%	0,2%	50,9%	24,1%	0,0%	0,0%	100%

Table 3**Permanent Grassland and Environmentally Sensitive Permanent Grassland (current greening)**

	PG subject to ratio (farms under greening obligation)	PG in Natura 2000 (ha)	ESPG designated in Natura 2000 (ha)	Share of PG in Natura in PG subject to ratio	Share of designated ESPG in PG in Natura
Belgium	441.037	51.413	19.308	12%	38%
Bulgaria	496.820	425.491	425.491	86%	100%
Czech Repub	560.495	140.348	140.348	25%	100%
Denmark	181.261	35.623	7.500	20%	21%
Germany	4.109.210	998.554	587.750	24%	59%
Estonia	186.861	38.141	3.840	20%	10%
Ireland	4.157.803	765.603	30.175	18%	4%
Greece	1.172.745	513.393	513.393	44%	100%
Spain	5.482.625	6.725.554	2.577.856	123%	38%
France	6.933.025	1.470.428	1.175.941	21%	80%
Croatia	148.807	59.398	34.075	40%	57%
Italy	1.746.285	1.353.591	1.353.591	78%	100%
Cyprus	3.202	872	778	27%	89%
Latvia	349.419	57.167	9.210	16%	16%
Lithuania	746.078	43.629	24.077	6%	55%
Luxembourg	61.983	18.028	3.195	29%	18%
Hungary	624.675	454.916	454.916	73%	100%
Netherlands	708.783	56.194	56.194	8%	100%
Austria	783.084	256.661	25.001	33%	10%
Poland	2.278.754	714.730	270.664	31%	38%
Portugal	872.783	284.050	3.757	33%	1%
Romania	1.881.768	699.630	699.630	37%	100%
Slovenia	238.171	75.746	20.850	32%	28%
Slovakia	407.079	134.597	134.597	33%	100%
Finland	143.091	3.696	3.696	3%	100%
Sweden	478.413	50.603	50.603	11%	100%
UK	9.107.678	1.144.733	917.190	13%	80%
TOTAL EU	44.301.934	16.572.788	9.543.627	37%	58%

Consistency issues with some data (such as ES) under examination

Malta has no grassland

Table 4: % organic area of total UAA by Member States

1 000 ha	UAA	Organic area				
		Area	Share in UAA (%)	Target 30%	Difference to target	
	Eurostat 2018				1 000 ha	% of UAA
EU27	161 070	12 981	8.1	48 321	35 340	21.9
BE	1 337	89	6.7	401	312	23.3
BG	5 019	129	2.6	1506	1377	27.4
CZ	3 500	520	14.9	1050	530	15.1
DK	2 628	257	9.8	788	532	20.2
DE	16 673	1 221	7.3	5002	3781	22.7
EE	1 018	207	20.3	306	99	9.7
IE	4 463	119	2.7	1339	1220	27.3
EL	5 184	493	9.5	1555	1063	20.5
ES	23 795	2 246	9.4	7138	4892	20.6
FR	29 088	2 034	7.0	8726	6692	23.0
HR	1 505	103	6.9	451	348	23.1
IT	12 823	1 958	15.3	3847	1889	14.7
CY	115	6	5.2	35	29	24.8
LV	1 950	280	14.4	585	305	15.6
LT	2 975	240	8.1	892	653	21.9
LU	131	6	4.4	39	34	25.6
HU	5 355	209	3.9	1607	1397	26.1
MT	12	0	0.4	3	3	29.6
NL	1 776	58	3.3	533	475	26.7
AT	2 596	639	24.6	779	140	5.4
PL	14 474	485	3.3	4342	3858	26.7
PT	3 582	213	5.9	1075	862	24.1
RO	13 396	326	2.4	4019	3693	27.6
SI	480	48	10.0	144	96	20.0
SK	1 908	189	9.9	573	384	20.1
FI	2 280	297	13.0	684	386	17.0
SE	3 007	609	20.2	902	293	9.8

Source: DG AGRI based on Eurostat

Table 5: Outlook balance sheet, 2030, million t

<i>Million tonnes</i>	Total cereals	Wheat	Barley	Maize	Oilseed
Production	320	157	61	72	32
Consumption	306	135	52	90	53
Imports	29	6	0	22	22
Exports	43	28	9	4	1
Net trade	14	23	9	-18	-21

Set-aside target: 8% less production

<i>Million tonnes</i>	Total cereals	Wheat	Barley	Maize	Oilseed
Production	294	145	56	66	29
Consumption	306	135	52	90	53
Imports	29	6	0	24	24
Exports	18	16	4	0	0
Net trade	-12	10	4	-24	-24

Organic area target: 6.6% less production

<i>Million tonnes</i>	Total cereals	Wheat	Barley	Maize	Oilseed
Production	299	147	57	67	30
Consumption	306	135	52	90	53
Imports	29	6	0	23	23
Exports	22	18	5	0	0
Net trade	-7	12	5	-23	-23

Cumulative impact of both targets: 14.6% less production

<i>Million tonnes</i>	Total cereals	Wheat	Barley	Maize	Oilseed
Production	273	134	52	61	27
Consumption	306	135	52	90	53
Imports	33	6	0	29	26
Exports	0	5	0	0	0
Net trade	-33	0	0	-29	-26

Table 6: Surplus of Nitrate from the indicator Gross Nutrient Balance

<i>Million tonnes</i>	2010.	2011	2012	2013	2014	2015.
EU - 27	7,7	7,8	7,7	7,9	7,4	8,1
Belgium	0,2	0,2	0,2	0,2	0,2	0,2
Bulgaria	0,1	0,1	0,1	0,1	0,1	0,1
Czechia	0,2	0,3	0,3	0,3	0,2	0,3
Denmark	0,2	0,2	0,2	0,2	0,2	0,2
Germany	1,3	1,5	1,2	1,3	1,1	1,4
Estonia	0,0	0,0	0,0	0,0	0,0	0,0
Ireland	0,2	0,1	0,1	0,2	0,2	0,2
Greece	0,3	0,3	0,3	0,3	0,3	0,3
Spain	1,1	0,9	1,0	0,9	1,2	1,2
France	1,2	1,5	1,1	1,3	1,3	1,2
Croatia	0,1	0,1	0,1	0,1	0,1	0,1
Italy	0,8	0,8	1,0	0,9	0,8	0,8
Cyprus	0,0	0,0	0,0	0,0	0,0	0,0
Latvia	0,1	0,1	0,0	0,1	0,1	0,1
Lithuania	0,1	0,1	0,1	0,1	0,1	0,1
Luxembourg	0,0	0,0	0,0	0,0	0,0	0,0
Hungary	0,2	0,2	0,2	0,2	0,1	0,2
Malta	0,0	0,0	0,0	0,0	0,0	0,0
Netherlands	0,3	0,3	0,3	0,3	0,3	0,3
Austria	0,1	0,1	0,1	0,1	0,1	0,1
Poland	0,8	0,8	0,7	0,8	0,6	0,7
Portugal	0,1	0,1	0,2	0,1	0,2	0,2
Romania	0,0	-0,2	0,2	0,1	0,0	0,1
Slovenia	0,0	0,0	0,0	0,0	0,0	0,0
Slovakia	0,1	0,1	0,1	0,1	0,0	0,1
Finland	0,1	0,1	0,1	0,1	0,1	0,1
Sweden	0,1	0,1	0,1	0,1	0,1	0,1