



Brussels, 18 November 2025

To: Commissioner Costas Kadis
Cc. Ms Ralitza Rosenova Petkova
Mr Antonio Basanta Fernandez
Ms Vassilia Theophilou

European Commission
Rue de la Loi 200
1049 Brussels, Belgium

Subject: Oppose to pesticides' deregulation in the Omnibus on food and feed safety - More protection is needed, not less!

Dear Commissioner Kadis,

Every week, several new peer-reviewed scientific studies are published in scientific journals, indicating the harm that pesticides cause on human health and the environment. Parkinson's disease among the farming community, certain types of cancer, infertility, pediatric leukemia and brain cancers as well as cognitive deficits in children from rural areas are linked to pesticide use. At the same time biodiversity continues to collapse, as pollinators, beneficial insects and birds decline. The scientific evidence points consistently in one single direction: **our current pesticide regulatory system is not protective enough.**

EU citizens regularly express their voices to demand the phase out of synthetic pesticides through consultations, barometers, the Conference on the Future of Europe and two successful European citizen initiatives. An IPSOS opinion poll from 2023 led in five EU Member States, clearly shows that a vast majority, **over 80% of citizens, ask for a pesticides phase out, and a better protection of health and the environment.**

Against this reality, it is incomprehensible that the Annual progress report on simplification from Commissioner Várhelyi's services, dated 4 November 2025, announced open-ended pesticide approvals, a request from the pesticide industry. Likewise, DG Sante **draft proposal for an Omnibus regulation on Food and Feed Safety**, which is currently in interservice consultation until 24 November 2025, proposes radical deregulation measures of pesticide approvals that will

strongly reduce the level of protection of citizens, natural resources and ecosystems against all pesticides.

In its proposal, the European Commission proposes to grant open-ended approval periods, while now pesticide substances need to be re-assessed every 10 to 15 years in order to take into account the latest scientific knowledge and new data requirements. This periodic review system is fundamental to ensure that dangerous pesticides are identified and phased out, to be replaced by less toxic alternatives. The regular revision, in light of new scientific evidence, is key to the effectiveness of the Regulation for a high level of protection, as it was concluded in the Commission's REFIT of 1107/2009 in 2020¹.

Without periodic assessment, highly hazardous pesticides such as **brain-harming chlorpyrifos, toxic to reproduction mancozeb or thiacloprid, and PFAS endocrine disruptor flufenacet would not have been banned in the past years.**

While the protection of citizens requires the use of the **most up to date scientific knowledge**, the current proposal would remove this obligation for Member States. When national authorities are assessing product authorisations, they may only consider the scientific knowledge available at the time of the EU active substance application, which means several years behind. This move towards less science and rigour is unacceptable leading to a reduction of the level of protection of citizens. Indeed, important new data on toxicity is published on a regular basis, allowing to complement the weaknesses of the pesticide regulatory system.

It is mostly thanks to independent, non-industry scientific knowledge that toxic pesticides are identified. Brain-harming chlorpyrifos and bee-toxic neonicotinoids would never have been banned without independent science and assessment.

Finally, in its proposal, the Commission pushes for **exceptionally long grace periods following the bans**: 2 years for sales and an extra year for use. This invites farmers stockpiling and keeps carcinogens, endocrine disruptors or bee-toxic pesticides in use for years after they are recognised as dangerous.

If a pesticide is banned because it harms babies, farmers or bees, it should be removed from the market immediately, not 3 years later.

Citizens ask for more protection against pesticides, not less. On 28 October, 138 civil society, scientific, water, and farming organisations across Europe have called² on European Commission President Ursula von der Leyen to fully enforce the EU Pesticide legislation. The letter followed the Commission's call for evidence on the 'Food and Feed Safety simplification omnibus,' which received 6,440 responses, over 90% from EU citizens warning that the law is poorly implemented

¹ https://food.ec.europa.eu/plants/pesticides/refit_en

²<https://www.pan-europe.info/press-releases/2025/10/130-organisations-urge-von-der-leyen-strengthen-enforcement-eu-pesticide-law>

and demanding more protection from pesticides, not deregulation. **The Commission proposal is unacceptable and opposed to Europeans' clear demands.**

PAN Europe has identified the following urgent priorities for improvement:

1. total phase out by 2030 of all pesticides listed as 'candidates for substitution', and all PFAS pesticide substances ;
2. obligation for testing of all pesticides for neurotoxicity, including the developmental neurotoxicity;
3. Equal risk assessment of pesticide metabolites and parent active substances;
4. Immediate implementation of cumulative and synergistic risk assessment. The European Food Safety Authority has not come up with a concrete methodology in 20 years, this situation is unacceptable
5. A full, comprehensive literature search at the start of any decision-making procedure, whether it is on pesticide active substances at EU level or on pesticide products at national level.

While the initial intention of the revision of the pesticide regulation (EC) 1107/2009 was to ease access to markets for biocontrol products, the current proposal serves as a 'Trojan horse' to deregulate toxic pesticides, lowering safety standards, reduce costs for the industry at the expense of protection of citizens' health and the environment.

Weakening the pesticide approval system at this moment would not only place citizens and the environment at risk, it would also **damage the credibility of the EU as a global leader** in health, sustainability, and evidence-based policymaking.

In conclusion, the current level of protection against pesticides, as well as the implementation of the current legislation should be improved, not dismantled. We respectfully urge you to oppose the attempt by DG Sante to reduce the level of protection of citizens' health and the environment.

Sincerely yours,

Martin Dermine, Executive Director, PAN Europe