



To:  
Ms. Ursula von der Leyen



President of the European Commission

Cc:

Mr. Olivér Várhelyi, Commissioner for Health and Animal Welfare

Ms. Jessika Roswall, Commissioner for Environment, Water Resilience and a Competitive Circular Economy

Mr. Christophe Hansen, Commissioner for Food and Agriculture

Brussels, 27 October 2025

**Subject: Call to strengthen implementation of EU Pesticide Law to protect health and the environment**

Dear Commission President von der Leyen,

We, the 139 undersigned organisations, are writing in the context of the simplification omnibus on Food and Feed Safety to urge for stronger implementation of the EU pesticide law to protect human health and the environment, while ensuring Europe's food production becomes more resilient and sustainable.

The Pesticide Regulation (1107/2009) is a cornerstone of EU legislation, designed to ensure, as a priority, a high level of protection for human health, animal health, biodiversity, and the environment. **In light of overwhelming scientific evidence on the harmful effects of synthetic pesticides on human health, ecosystems, water quality, and food sovereignty, we stress the urgent need to uphold Regulation 1107/2009 and to focus on its effective implementation.**

As [documented](#) by the EU-funded SPRINT project, European citizens are continuously exposed to a cocktail of pesticide residues through air, water, house dust, and food, and their impacts extend far beyond agricultural areas. [Biomonitoring data](#) indicate the presence of these chemicals, often in combination, in both adults and children. Alarming, synthetic pesticides are engineered to kill insects, fungi, and weeds, but they can also interact with human cells and organs, posing serious risks to health. Chronic exposure to pesticides has been linked to a [wide range of diseases](#), including many types of cancers, respiratory illnesses, reproductive disorders, neurodegenerative diseases, and developmental delays in children. Farmers, agricultural workers, and rural communities face heightened risks, with evidence pointing to increased incidences of blood cancers, prostate cancer, and Parkinson's disease. Children, who are especially vulnerable as their bodies and neurological systems are still developing during both

prenatal and early postnatal stages, were shown to develop cognitive disorders due to early life exposure to pesticides<sup>1</sup>.

The [environmental impacts](#) are even better demonstrated by science. Pesticides contaminate terrestrial and aquatic ecosystems, threatening countless species and their habitats. The Commission-supported [INSIGNIA-EU](#) preparatory action, which utilised honeybees as environmental microsamplers due to their ubiquity and relevance in our food security, demonstrated the omnipresence of pesticide residues, including some that are illegal. [Insect](#) and [bird populations](#) have been plummeting at an alarming rate, with pesticides a main driver. [Pesticide drift](#), for instance, has been shown to reduce wild plant diversity by over 50% within 500 metres of treated fields, drastically limiting resources for pollinators. This alarming decline in biodiversity undermines crucial ecosystem services, such as pollination, pest control, and soil health, that are vital for sustainable agriculture and food security<sup>2</sup>.

Citizens across Europe are alarmed by the dangers of harmful chemicals. The broad demand for pesticide reduction has been consistently demonstrated in the EU over the last years<sup>3</sup>, through [consultations](#), [barometers](#), [opinion polls](#) and two successful [European citizen initiatives](#).

Synthetic pesticides are replaceable. [Scientific evidence](#), projects and farmers across Europe<sup>4</sup> show that Europe can feed its population without relying on harmful pesticides. Agroecological farming and the ambitious implementation of Integrated Pest Management (IPM) presents a viable and necessary alternative. By working with nature, rather than against it, farmers applying IPM, agroecological and organic practices enhance biodiversity, improve soil health, capture carbon, and build resilience to pests, diseases, and climate change. In addition to environmental and health benefits, such approaches preserve long-term crop productivity and support farm profitability<sup>5</sup>.

We are therefore highly concerned about the [recent 'simplification' proposals](#) from several Member States asking the European Commission to extend transition periods for banned substances, broaden the use of temporary approvals of harmful substances under Article 4(7) of Regulation 1107/2009, and consider reintroducing the so-called "essential use" derogation. Such proposals run directly counter to the purpose of the Regulation, which aims to ensure a high level

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<sup>1</sup> [The impact of pesticides on people's Health](#)

<sup>2</sup> [The impact of pesticides on biodiversity](#)

<sup>3</sup> [Citizens' Demands for Pesticide Reduction in Europe](#)

<sup>4</sup> Pe'er et al. (2023). [Scientists support the EU's Green Deal and reject the unjustified argumentation against the Sustainable Use Regulation and the Nature Restoration Law](#); Schiavo et al. (2021). [An agroecological Europe by 2050: What impact on land use, trade and global food security?](#); INRAE, (2023). [European Pesticide-Free Agriculture in 2050](#), IPMWORKS project. [Reducing pesticide use is a must for the future](#), INRAE (2022). [Protect crops by increasing plant diversity in agricultural areas](#), United Nations (2017). [Report of the Special Rapporteur on the right to food](#), EARA (2025). [Farmer-led Research on Europe's Full Productivity](#)

<sup>5</sup> Lechenet, Martin, et al. (2017). [Reducing pesticide use while preserving crop productivity and profitability on arable farms](#); Mouratiadou et al. (2024). [The socio-economic performance of agroecology. A review](#); van der Ploeg et al. (2019). [The economic potential of agroecology: Empirical evidence from Europe](#), Magrach et al. (2022). [Increasing crop richness and reducing field sizes provide higher yields to pollinator-dependent crops](#), Nandillon (2024). [Evolution of practices and technico-economic performances within farms of the DEPHY network](#)

of protection against pesticides while disregarding the scientific evidence on the severe impact of pesticide use.

The measures these Member States are calling for are, in effect, already occurring due to exceptions in the current Regulation (e.g., Article 4(7) when there is a 'serious danger to plant health', Article 53 for 'emergency situations'). These exceptions, however, are [currently abused](#) by certain Member States, resulting in the persistent failure to properly implement the provisions of the Regulation. Substances identified as too hazardous for renewal by the European Food Safety Authority (EFSA) or the European Chemical Agency (ECHA) often remain on the market for years beyond the intended approval period due to delays in risk assessment. Even after a ban is finally enacted, these substances are typically granted additional grace periods ranging from 9 to 18 months, despite the serious risks they pose to human health and the environment. A recent example is flufenacet, a substance identified as an endocrine disruptor and a poly- and perfluoroalkyl substance (PFAS) that releases trifluoroacetic acid (TFA) in groundwater in concentrations significantly exceeding the legal limit (0.1 µg/L). Yet, [flufenacet](#) remained approved for 11 years beyond its initial expiration date and was granted a further undue 18-month grace period.

We are aware of the Commission's [initiative](#) to reduce administrative burdens and simplify aspects of the EU food safety legislation (the so-called 'omnibus'), including measures to facilitate market access for biological control substances. While enhanced capacity and expertise for robust risk assessment of biocontrol products would be a positive step, it is essential that such efforts do not result in any weakening of the protection standards established under the Pesticide Regulation. Furthermore, the growing availability of biocontrol substances is important, but must be complemented by measures that ensure their practical adoption and the effective implementation of Integrated Pest Management (IPM), based on holistic, preventative measures, to achieve effective phase-out of the use of synthetic pesticides. Yet, despite being mandatory since 2014 under the Sustainable Use of Pesticides Directive 2009/128/EC, IPM is very poorly implemented across Member States. The Commission should therefore focus on ensuring the enforcement of the legislation, including by Member States.

**The European Commission should uphold the Pesticide legislation, and serve EU citizens by focusing on the full implementation of its provisions. The health of people, nature, and future generations depends on it.**

Thank you for your attention to this urgent matter. We remain at your disposal should you wish to schedule a meeting to discuss these concerns further.

Sincerely yours,

Dr. Martin Dermine  
Executive Director  
Pesticide Action Network Europe (PAN Europe)

On behalf of:

**European / International Organisations**

Action for Solidarity, Equality, Environment, and Diversity (ASEED Europe)

Agroecology Europe

Animal Advocacy & Food Transition

APIMONDIA Federation

BeeLife European Beekeeping Coordination

Biodynamic Federation Demeter International

BirdLife Europe and Central Asia

Chem Trust

Child Rights International Network (CRIN)

ClientEarth

Corporate Europe Observatory

ECOROPA, European Network for Ecological Reflection and Action

European Environmental Bureau (EEB)

European Network of Scientists for Social and Environmental Responsibility

Foodwatch International

Friends of the Earth Europe

Greenpeace

Health and Environment Alliance (HEAL)

IFOAM Organics Europe

International Association of Waterworks in the Rhine Basin (IAWR)

Natural Mineral Waters Europe

Pesticide Action Network Europe (PAN Europe)

SAFE - Safe Food Advocacy Europe

Save Our Seeds

Slow Food

UNESCO Chair in World Food Systems

Women Engage for a Common Future

WWF European Policy Office

**National organisations**

**Armenia**

Armenian Women for Health and Healthy Environment (AWHHE)

**Austria**

Arche Noah

ÄrztInnen für eine gesunde Umwelt (ISDE Austria)

BirdLife Austria

GLOBAL 2000 – Friends of the Earth Austria

Südwind

## **Belgium**

Adoc Companie

Arsenic2

Bond Beter Leefmilieu

Bioforum vzw

Canopea

Collectif 5C

Dryade

Entraide et Fraternité

Iles de Paix

Les Amis de la Terre - Belgique asbl

Mutualités Libres – Onafhankelijke Ziekenfondsen

Natagora

Nature & Progrès Belgique

Natuurpunt vzw

Velt vzw

Vlaamse Parkinson Liga vzw

Voedsel Anders Vlaanderen

Vogelbescherming Vlaanderen vzw

West-Vlaamse Milieufederatie vzw

Christelijk Mutualiteit-Mutualité Chrétienne

## **Bulgaria**

Agrolink

Via Pontica Foundation

## **Croatia**

Earth Trek (Zemljane staze)

Eco Hvar

## **Czech Republic**

Czech Society for Ornithology

Hnutí DUHA - Friends of the Earth Czech Republic

## **Denmark**

Green Transition Denmark

## **France**

Collectif de soutien aux victimes des pesticides de l'ouest

Fédération Française des Apiculteurs Professionnels

Fédération SEPANSO Aquitaine

Génération Futures

Notre Affaire à Tous  
POLLINIS  
Riverains Ensemble  
Secrets Toxiques  
SOS MCS, Association d'aide et de défense des personnes atteintes du syndrome d'hypersensibilité chimique multiple  
Terre d'Abeilles  
Union Nationale de l'Apiculture Française (UNAF)  
Vaurais Nature Environnement

### **Germany**

Anuk e.V. Biodiversity through pesticide reduction Rhineland-Palatinate  
Bündnis für eine enkeltaugliche Landwirtschaft  
Coordination gegen BAYER-Gefahren  
Deutsche Umwelthilfe (DUH)  
Deutscher Imkerbund e.V.  
Deutscher Naturschutzring (DNR)  
German Speleological Federation  
Imkerverband Rheinland-Pfalz e.V.  
Institute for Soil Conservation & Sustainable Agriculture  
Manfred-Hermsen-Stiftung for Nature and Environment  
NABU e.V.  
Pestizid Aktions-Netzwerk e.V. (PAN Germany)  
Slow Food Deutschland  
Umweltinstitut München e.V.  
Zukunftsstiftung Landwirtschaft

### **Greece**

EcoCity

### **Ireland**

Environmental Pillar  
The Environmental Forum  
Zero Waste Alliance Ireland

### **Italy**

ACP (Associazione Culturale Pediatri)  
Associazione Nazionale Giacche Verdi Sicilia ODV (Bronte)  
Cillsa (Cittadini per il lavoro la legalità, la Salute e l'Ambiente – Associazione ecologista dell'Ovest Vicentino)  
Égalité  
ISDE (International Society of Doctors for Environment) Italy  
Navdanya International  
Lipu BirdLife Italia

**Latvia**

Latvian Fund for Nature

**Luxembourg**

Campagne “Ouni Pestiziden”

Ëmweltberodung Lëtzebuerg asbl

Meng Landwirtschaft

Mouvement Ecologique

Natur&ëmwelt a.s.b.l.

Lëtzebuerger Landesverband fir Beienzuucht

**Malta**

Friends of the Earth Malta

**Netherlands**

Natuur & Milieu

Natuur- en Milieufederaties

Natuurmonumenten

Pesticide Action Network Netherlands

Soorten NL

Vogelbescherming Nederland

**Poland**

Dobrze Food Cooperative

Fundacja Zielone Światło

Living Earth Coalition

Polish Society for the Protection of Birds (BirdLife Poland)

Zielone Wiadomości

**Portugal**

ZERO – Association for the Sustainability of the Earth System

**Romania**

ROMAPIS – Federation of Romanian Beekeeping Organizations

Romanian Ornithological Society

**Slovakia**

Institute of Circular Economy (INCIEN)

SOS/BirdLife Slovensko

**Slovenia**

The Institute for Health and Environment



## Spain

Alimentta

Amigas de la Tierra

Asociación Bee Garden

Asociación Española de Apicultores

Asociación EXTREMADURA SANA

Asociación Nacional Defensa Animales (ANDA)

Asociación Vida Sana

Cooperativa Agroecológica de Montaña S. Coop

Ecologistas en Acción

Hogar sin Tóxicos

La Garbancita Ecológica S. Coop. Mad.-Spain

Mensa Cívica

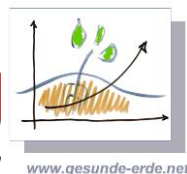
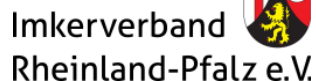
Observatorio para una Cultura del Territorio

Sociedad Española de Agricultura Ecológica y Agroecología (SEAE)

## United Kingdom

Pesticide Action Network UK







Slow Food®  
Deutschland



Environmental  
Pillar



de natuur en  
milieufederaties

NATUUR  
& MILIEU





