



CHEMTrust
Protecting humans and wildlife
from harmful chemicals



wecf
International



To:

Ms. Ursula von der Leyen



UNESCO Chair in
World Food
Systems



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. Alarmingly, 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 pesticides¹.

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 security².

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 years³, through [consultations](#), [barometers](#), [opinion polls](#) and two successful [European citizen initiatives](#).

Synthetic pesticides are replaceable. [Scientific evidence](#), projects and farmers across Europe⁴ 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 profitability⁵.

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

¹ [The impact of pesticides on people's Health](#)

² [The impact of pesticides on biodiversity](#)

³ [Citizens' Demands for Pesticide Reduction in Europe](#)

⁴ 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](#)

⁵ 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
ÄrztlInnen 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
Générations 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 Naturschutzzring (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





WEST-VLAAMSE
MILIEUFEDERATIE



Hnutí DUHA

Green Transition Denmark



générations FUTURES



POLLINIS

RIVERAINS ENSEMBLE



SOS MCS
Association d'aide et de défense
des personnes atteintes du syndrome
d'hypersensibilité chimique multiple



vaurais nature
environnement



ANUK e.V.
Artenschutz * Naturschutz
Umweltschutz * Klimaschutz

Bündnis für
eine enkeltaugliche
Landwirtschaft



Deutsche Umwelthilfe

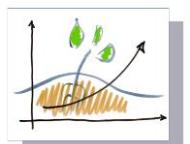
DEUTSCHER
IMKERBUND E.V.



DNR
DEUTSCHER
NATURSCHUTZRING



Imkerverband
Rheinland-Pfalz e.V.



www.gesunde-erde.net





INSTITUTE
OF CIRCULAR
ECONOMY



