

Brussels, 9th May 2023

To:

Ms Stella Kyriakides Commissioner for Health and Food Safety

Cc:

Mr Frans Timmermans, Executive Vice-President for the European Green Deal
Mr Virginijus Sinkevičius, Commissioner for Environment, Oceans and Fisheries

Subject: 10 demands to urgently address shortcomings and flaws in the EU pesticide authorisation system

Dear Commissioner Kyriakides,

We, the 83 undersigned civil society organisations, are writing to you to ask you to respond urgently to the unfulfilled requests from the European Parliament to improve the current pesticide authorisation system in Europe and ultimately ensure the high level of protection that EU law requires.

Five years ago, following citizens' concerns over the evaluation of glyphosate in Europe, the European Parliament set up a special committee (PEST) to investigate the authorisation procedure for all pesticides¹. After nine months of investigations, the PEST committee concluded that the primary objective of Regulation (EC) 1107/2009 to ensure a high level of protection for the environment, human and animal health, was not fully achieved as a result of major shortcomings in the pesticide authorisation system. To address this worrying situation, it provided more than 100 specific recommendations, which were largely endorsed by the European Parliament's Plenary in 2019². All were meant to improve protection from pesticides and to restore citizens' trust in the European institutions after glyphosate's reapproval in December 2017.

On the four-year anniversary of the adoption of this report and while glyphosate is being re-evaluated, an assessment by PAN Europe revealed³ that only 15% of the recommendations to improve the pesticide authorisation system have been implemented. The remaining ones have been followed up only partly, inadequately or not at all by the Commission, Member States and the European Food Safety Authority (EFSA). These include recommendations that aim to

¹ [Pesticides: MEPs propose blueprint to improve EU approval procedure | News | European Parliament \(europa.eu\)](#)

² https://www.europarl.europa.eu/doceo/document/TA-8-2019-0023_EN.pdf

³ [Gaps in EU pesticide authorisation | PAN Europe \(pan-europe.info\)](#)

improve the conditions for an objective, transparent and high quality risk assessment, which truly endorses recent independent scientific literature and is protected against any conflicts of interest, while in cases of uncertainty strictly applies the precautionary principle in decision-making.

In these four years, the European Court of Justice has also highlighted infringements in the implementation of the EU pesticide Regulation, such as the misuse of the “emergency situation” derogation,⁴ the lack of transparency in the decision-making procedures⁵ and clarifying the legal requirement to thoroughly assess the toxicity of pesticide active substances as well as products.⁶ Moreover, studies continue to show that pesticide use in Europe still poses a threat to human health, including that of children⁷ and the environment.⁵ According to the European Environment Agency, in 22% of European rivers and lakes at least one or more pesticides are still detected above the safety level, whereas a biomonitoring study across five EU countries revealed that at least two pesticides were detected in 84% of survey participants⁸.

These findings undermine the Commission's claim that protecting European citizens, biodiversity and ecosystems from the harmful effects of pesticides stands as a priority. They also run counter to the expectations expressed by European citizens to gradually phase out the use of synthetic pesticides in Europe⁹. Furthermore, they conflict with the EU's Chemicals Strategy for Sustainability, the One Health Approach and the Beating Cancer Plan.

We welcome the European Green Deal, its flagship Farm to Fork Strategy and the proposal for a Sustainable Use of Pesticide Regulation. We acknowledge that this highly needed general framework has the potential to meet some of the PEST Committee's recommendations, namely by cutting in half the use and risk of pesticides and of the more hazardous ones by 2030, and banning pesticide use in sensitive areas, such as those used by the general public and of ecological importance. Nevertheless, the scope of the PEST Committee recommendations was first and foremost to improve the implementation of the existing pesticide authorisation system to ensure a high level of protection for human health and the environment, which remains to be addressed.

Therefore, we ask you to ensure the work of this Parliamentary Committee is not left unattended by the current Commission. We therefore call on you to augment the discussions with other Commissioners, Member States and your services to follow up on these

⁴ Case C-162/21

⁵ Cases T-371/20 and T-554/20

⁶ Case C-616/17,

⁷ Inserm 2021. Collective Expert Review “Effects of pesticides on health : New data”

<https://www.inserm.fr/expertise-collective/pesticides-et-sante-nouvelles-donnees-2021/>

⁸ European Environmental Agency, 2023. How pesticides impact human health and ecosystems in Europe

<https://www.eea.europa.eu/publications/how-pesticides-impact-human-health>

⁹ European Citizens Initiative “SaveBees&Farmers”

https://ec.europa.eu/commission/presscorner/detail/en/ip_23_2084

Conference on the Future of Europe

[Reporting - Conference on the Future of Europe \(europa.eu\)](https://www.europa.eu/Reporting-Conference-on-the-Future-of-Europe)

recommendations, starting with what we consider to be the [10 most urgent demands to improve pesticides assessment in Europe](#).

To discuss the particularly important content of this letter, we hope you will agree to meet with us in the forthcoming weeks.

Thanking you in advance for your consideration and your reply.

Sincerely yours,

Angeliki Lyssimachou
Head of Science and Policy
Pesticide Action Network Europe

On the behalf of:

ACU - Associazione Consumatori Utenti
Agroecology Italy
AIAPP Associazione Italiana di Architettura del Paesaggio
Amigos de la Tierra
APRA Le Chabot
Arthropologia
ASEED Europe
Asociación Galega de Custodia do Territorio
Association Alerte Pesticides Haute Gironde
Bio Consomm'acteurs réunion
Campagne Glyphosate 46
Canopée 12
Pour Notre Santé
Auclair et Marill
Aurelia Foundation for bees, pollinators and biodiversity
Avenir Santé Environnement
BeeLife European Beekeeping Coordination
Bündnis für eine enkeltaugliche Landwirtschaft e.V.
Combat Monsanto
Compassion in World Farming EU
Confédération paysanne
Confédération paysanne du Lot
Consommateurs pas cobayes !
Cooperativa Germinando
Coquelicots du Vaurais
Corporate Europe Observatory

Cork Environmental Forum
De Landgenoten
Decade of Action
Earth Trek
Eco Hvar
Ecologistas en Acción CODA
Égalité
Ekō
European Agroforestry Federation,
Federazione Nazionale Pro Natura,
Foll'avoine
Foodwatch International
Friends of the Earth Europe
Fundacja Strefa Zieleni
Générations Futures
GLOBAL 2000 - Friend of the Earth Austria
GMWatch
Groupe N&P Lorraine Alsace
Halte OGM 07
Health and Environment Alliance (HEAL)
Hellenic Ornithological Society
Hogar sin Tóxicos
Humeco
Institute for Agriculture and Trade Policy Europe
International Society of Doctors for Environment Italy (ISDE)
Italian Coalition Cambiamo Agricoltura
Legambiente
Les Pyrénées re-belles
Lipu - BirdLife Italia
Mensa Cívica
Mouvement Ecologique ASBL
Nature & Progrès Belgique
Nature et Progrès France
Natuur & Milieu
Natuurpunt
Navdanya International
Nous voulons des coquelicots - Mouans-Sartoux
Pesticide Action Network (PAN) Netherlands
Pesticide Action Network (PAN) Europe
Pestizid Aktions Netzwerk e.V. (PAN) Germany
Pisseurs.sseuses Involontaires de Glyphosate (PIG) BZH
Pollinis
ReAct Transnational
Rete Semi Rurali ETS

Santé Environnement Auvergne Rhône-Alpes
Save Bees and Farmers
Secrets Toxiques
SEO/BirdLife
Slow Food
Slow Food Deutschland
Sociedad Española de Agricultura Ecológica/Agroecología
SOS Faim
SOS MCS
Terre d'Abeilles
URGENCI, Voedsel - Anders
WeMove Europe
ZERO - associação sistema terrestre sustentável