



Open letter to:

The permanent representations to the European Union

9 December 2022

Subject: Prioritise the protection of people's health and oppose a complementary impact assessment on the SUR proposal

Dear Permanent Representative to the European Union,

On behalf of the Health and Environment Alliance (HEAL) and our health group members working together across Europe to protect health and prevent diseases, we are writing to you to express our deep concerns at the current attempts by certain EU member states to delay the adoption of the proposal for a Sustainable Use of Plant Protection Products Regulation (SUR) by requesting a complementary impact assessment. This [file](#) is critical for the protection of people's health and we appeal to you to not delay its adoption.

The Health and Environment Alliance (HEAL) is the leading not-for-profit organisation addressing how the environment affects human health in the European Union (EU) and beyond. HEAL works to shape laws and policies that promote planetary and human health and protect those most affected by pollution, and raise awareness on the benefits of environmental action for health. Our over 90 member organisations include international, European, national and local groups of health professionals, not-for-profit health insurers, patients, citizens, women, youth, and environmental experts representing over 200 million people across the 53 countries of the WHO European Region.

We are concerned that 19 countries are currently discussing to request a complementary study to the current impact assessment by the European Commission on the SUR proposal, arguing that the possible long-term impacts of the energy and food price crises due to the Ukraine war should be taken into consideration to ensure food security. These attempts, however, will only achieve the contrary. They are blocking the EU's opportunity to address long-term food security by moving towards a healthy, just, and environmentally-friendly food system, where Europe develops its environmental, health and economic resilience, as [previously highlighted](#) by environmental health groups. In fact, the SUR is an opportunity to improve public health for the following reasons.

It is urgent to reduce our exposure to harmful pesticides and protect people's health

The SUR is key to delivering the objectives of the European Green Deal for human health. It aims to improve health protection and disease prevention by promoting the use of safer alternatives to pesticides and therefore is crucial for the future of a healthy food production system. It also responds to the recent [European Citizens' Initiative "SaveBees&Farmers"](#), where over 1 million Europeans are calling the European Commission to phase out synthetic pesticides by 2035 because of their devastating impacts to human and environmental health.

To this day the use of synthetic pesticides in agriculture, green and urban public spaces, continues to put the health of [farm workers](#) and citizens at risk, including that of young children. According to the French health institute [INSERM](#), exposure to pesticides is linked to a range of diseases including different types of cancer, respiratory and Parkinson's disease and cognitive disorders. A [study in Italy](#) showed that communities living in agricultural areas are also affected, as pesticides were detected in playgrounds and schoolyards at distances of 5 to 600 meters from where they have been used. Therefore, it is urgent to set measures to reduce pesticide exposure and protect public health.

The SUR can ensure that Member States deliver on commitments from 2009 by setting legally-binding pesticide reduction targets

It has been over a decade that the Sustainable Use of Pesticides Directive 2009/128/EC was adopted requiring member states to reduce the risks and impacts of pesticide use on human health and the environment, minimize or prohibit their use in areas used by the public and promote the use of non-chemical and safer alternatives to pesticides. According to [the European Court of Editors](#), the implementation of the Directive has been very weak and the pesticide use and risk in certain member states continues to be high. Contrary to the arguments brought forward by Council members, the SUR proposal's pesticide reduction targets are far from ambitious. By setting legally binding long-term targets to reduce pesticide use and risk, the Commission simply aims to ensure the effective implementation of the EU legislation by member states towards a uniform and high level of protection from pesticides across the EU.

The SUR is key to changing the paradigm in agriculture

The war in Ukraine has taught us the importance of long-term solutions to build our resilience and food security. Our current agricultural model is unsustainable and threatens not only our health and that of our children but also biodiversity, soil fertility, ecosystems services and therefore the future of agriculture. The SUR is our last opportunity to change this agricultural model and move towards a sustainable, healthy, just, and environmentally-friendly food system.

We thank you for considering our public health concerns and appeal to you to oppose a complementary impact assessment study on the SUR proposal in view of promoting a healthier, more resilient and autonomous Europe for today's and future generations.

Yours sincerely,

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As an alliance, HEAL brings independent and expert evidence from the health community to EU and global decision-making processes to inspire disease prevention and to promote a toxic-free, low-carbon, fair and healthy future.