

Brussels, 9th June 2023

Subject: No backward step in pesticide regulation

Dear Member of the European Parliament,

In these times of increasing attacks on the regulation proposal for the sustainable use of pesticides (SUR), we - the 83 undersigned civil society organisations - are writing to you to recall the European Parliament's request to the Commission and Member States to improve the existing pesticide regulation in a plenary vote in January 2019. Under the chairmanship of Eric Andrieu (S&D) and leadership of Norbert Lins (EPP) and Bart Staes (Greens/EFA), all major groups in the European Parliament agreed that protecting human, animal and environmental health from pesticides stood as a priority in Europe and that a stricter and thorough regulation of pesticides was needed for that very purpose. We urgently ask you to take action in light of your mandate to make sure this EP action plan is implemented.

Five years ago, following citizens' concerns over the evaluation of glyphosate in Europe, the US' ongoing litigations and subsequent publication of the Monsanto Papers, the European Parliament set up a special committee (PEST) to investigate the authorisation procedure for all pesticides.¹ 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, and was not fully achieved due to 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 in 2019.² Among these, stands a clear demand to ban the use of pesticides in areas used by the general public, the adoption of specific measures to protect vulnerable populations and the environment, and a full implementation of Integrated Pest Management (IPM).³ All were meant to improve protection from pesticides and to restore citizens' trust in the European institutions after glyphosate's reapproval.

On the four-year anniversary of the adoption of this report, and while glyphosate is being re-evaluated, an assessment by PAN Europe revealed⁴ that only 15% of the recommendations to improve the pesticide authorisation system have been implemented. These include recommendations that aim to set a new policy regulatory framework driving the transition towards a pesticide-free Europe; to improve public access to industry studies, and to reform

¹ [Pesticides: MEPs propose blueprint to improve EU approval procedure | News | European Parliament \(europa.eu\)](https://www.europarl.europa.eu/news/en/press-room/2018/05/statement-by-the-pest-committee-on-pesticides-20180524)

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

³ See paragraphs 11, 13 and 14: https://www.europarl.europa.eu/doceo/document/TA-8-2019-0023_EN.pdf

⁴ [Gaps in EU pesticide authorisation | PAN Europe \(pan-europe.info\)](https://pan-europe.info/gaps-in-eu-pesticide-authorisation)

procedural guidance documents for pesticide applicants. A further 7% of the recommendations would be implemented if the proposed SUR by the Commission is adopted.

In this context, the frontal opposition of some political groups to the SUR proposal is concerning. It means that many MEPs are now blocking the implementation of recommendations that the Parliament itself has issued, cementing thereby a backward movement in the institution's ambitions. Yet, such a setback is not justified as the voice of European citizens remains consistent and has become even stronger than it was in 2019 when it comes to pesticide regulation⁵.

Therefore, in times when evidence on the deteriorating state of European ecosystems⁶, whose role is central to ensuring food security, and when vulnerable populations continue to be exposed to unacceptable levels of health-harming pesticides,⁷ your institution must not back down. **You are bound by the legacy of this institution to represent the European people that you have the honour and responsibility to serve.** The European Parliament as a whole has a democratic duty to welcome the proposed SUR and defend its ambitions to the Council.

Furthermore, we want to highlight that the rest of the non-fulfilled PEST-recommendations, notably those asking to **fully assess the adverse effects of pesticides in the context of an independent, transparent, objective and high-quality risk assessment, and to strictly apply the precautionary principle and the approval criteria in decision-making**, are equally crucial but remain unattended by the Commission, Member States and the European Food Safety Authority (EFSA). Here, as a legislator, it is important that your recommendations are acted upon, also for restoring and keeping trust in the EU decision-making process and governance. In this respect, we share with you the [10 most urgent demands](#) to improve pesticides assessment in Europe.

We hope for a response from you on this important issue.

Thanking you in advance for your consideration and your support.

Sincerely yours,

Angeliki Lyssimachou
Head of Science and Policy
Pesticide Action Network Europe

⁵ 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 \(europa.eu\)](#)

⁶ [State of nature in Europe: Damaged ecosystems need restoration \(europa.eu\)](#)

⁷ [More action needed in the EU to reduce the impacts of chemical pesticides \(europa.eu\)](#)

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
Génération 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