



Ms Stella Kyriakides<sup>[1]</sup>  
 Commissioner for Health and Food Safety

May 16<sup>th</sup>, 2024

Mr. Janusz Wojciechowski  
 Commissioner for Agriculture

Mr. Norbert Lins (In copy)  
 Chair of the AGRI Committee on Agriculture and Rural Development

**Subject: Reaction of 29 NGOs to the letter of Mr. Lins dated from April 17<sup>th</sup>, on the availability of pesticides in the EU**

Dear Commissioner Kyriakides,  
 Dear Commissioner Wojciechowski,

We have had the opportunity to read the letter addressed to you by Mr. Norbert Lins, Chair of the Committee on Agriculture and Rural Development in the European Parliament. This letter, in substance, demands an ease in the application of the current regulation on pesticides' market authorisations in the next Commission mandate.

This demand is highly problematic in many regards. While the current regulation is supposed to guarantee a high level of protection for human health and the environment, it already suffers from important caveats in its implementation. Scientific proofs of the adverse effects of pesticide uses are accumulating. Meta-analysis of thousands of scientific papers has shown the deleterious effects of pesticides on both human health<sup>1</sup> and the environment<sup>2</sup>. The European continent has witnessed a decline of 80% in total flying insect biomass in the last 30 years<sup>3</sup>, a decline in which pesticides and intensive farming are the major factors. If regulation 1107/2009 was properly implemented, such effects would be nonexistent. Therefore,

<sup>1</sup> <https://www.inserm.fr/expertise-collective/pesticides-et-sante-nouvelles-donnees-2021/>

<sup>2</sup> <https://www.inrae.fr/actualites/impacts-produits-phytopharmaceutiques-biodiversite-services-ecosystemiques-resultats-lexpertise-scientifique-collective-inrae-ifremer>

<sup>3</sup> <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0185809>

contrary to what Mr. Lins asserts, current regulation is actually under-implemented and procedures for pesticide approvals have to be strengthened. Two recent rulings (in case C-308/2022 and merged cases C-309/22 and C-310/22), the Court of Justice of the EU also underlined the insufficient level of implementation of regulation (EU) 1107/2009 by Member States.

In his letter, Mr. Lins claims that a wide range of chemical options is key to achieving good yields. This vision of agriculture is outdated. Phasing out synthetic pesticide use is being demanded by farmers, agronomists, scientists, citizens who want to move towards a safer, more respectful model of agriculture for the XXI<sup>st</sup> century. They are opposed to blindly carry on with an agricultural model which is heavily dependent on petrochemistry, which feeds the profits of a few while fueling the environmental crises and public health issues, which counts on artificial pollination to replace the annihilated pollinators, which is killing the bioactive potential of soils, and which threatens food sovereignty in our continent.

Agriculture and ecology must not be in opposition, but should work hand in hand in order to guarantee safe and healthy food and agricultural supplies for this and succeeding generations. Food production depends on healthy ecosystems: agriculture needs to protect their healthy functioning. Science has demonstrated the feasibility and the potential benefits of agroecological farming<sup>4</sup>. Farmers are often the first to fall sick from pesticide exposure. When they protested in the first weeks of 2024, their main demand was a guarantee of their income. But this can be obtained in other ways than diminishing the safety requirements on pesticide use and market authorizations. Farmers need comprehensive support in the form of well-planned and organized programs of help to transition from agro-chemistry to nature-inclusive, agroecological and organic systems, while fully implementing integrated pest management.

With the climate crisis, environmental pollution crisis and the collapse of biodiversity, humanity is at a crossroads. The European Union, with its history, cultural diversity and economic power, has the responsibility to be at the forefront of the transition from fossil fuels civilization to a society able to humanely face the challenges that almost two centuries of industrialization have left to the XXI<sup>st</sup> century. Citizens need thriving, healthy, resilient, lively agricultural systems which are fit for purpose to tackle the huge and urgent challenges the EU is facing. It is your responsibility to move forward on this agenda, for which you will find extensive support from European citizens and civil society. Indeed, over the last decade, European citizens have more than clearly expressed their demand to strongly reduce pesticide use (Stop Glyphosate and Save Bees and Farmers European Citizens Initiatives; EU Eurobarometers, Conference for the Future of Europe).

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<sup>4</sup> See for instance

- Schiavo, M., Le Mouël, C., Poux, X., Aubert, P.-M., (2021). An agroecological Europe by 2050: What impact on land use, trade and global food security? IDDRI, Study N°08/21.

- Olivier Mora, Jeanne-Alix Berne, Jean-Louis Drouet, Chantal Le Mouël, Claire Meunier, et al.. European Chemical Pesticide-Free Agriculture in 2050. Foresight Report.. INRAE; DEPE. 2023, 643 p. (hal-04231124)

We urge you to choose this path, to refuse the proposition of Mr. Lins and others to demean the state of the law of the Union on pesticides' market authorisations, and to rise up to the much-needed ambition to implement a truly modern agricultural model in Europe.

Yours sincerely

*Secrets Toxiques*  
*Alerte des Médecins sur les pesticides*  
*Alerte Pesticides Haute Gironde*  
*BeeLife*  
*Biodiversité sous nos pieds*  
*Bündnis für eine enkeltaugliche*  
*Landwirtschaft*  
*Campagne Glyphosate France*  
*Collectif Soutien aux victimes des pesticides*  
*de l'ouest*  
*Comité écologique Ariégeois*  
*Coquelicots de Mouans-Sartoux*  
*Eccologistas en accion*  
*Eco Hvar*  
*Ecoropa*  
*Fédération des Grands Causses*

*Génération Futures*  
*N&P Ariège*  
*N&P Aveyron*  
*Nature et Progrès Belgique*  
*Notre Affaire à Tous*  
*PAN Europe*  
*PAN Germany*  
*Pollinis*  
*ReAct Transnational*  
*SOS MCS*  
*Syndicat National de l'Apiculture (SNA)*  
*Tarn sans pesticides*  
*Terre d'Abeilles*  
*Vigilance OGM 46*  
*ZEA*