

To

Mrs. Ursula VON DER LEYEN, President of the European Commission
Mrs. Teresa RIBERA, Executive Vice-President for a Clean, Just and Competitive Transition
Mr. Stéphane SÉJOURNÉ, Executive Vice-President for Prosperity and Industrial Strategy
Mr. Christophe HANSEN, Commissioner for Agriculture and Food
Mrs. Jessika ROSWALL, Commissioner for Environment, Water Resilience and a
Competitive Circular Economy

Paris, December 15, 2025,

Subject: Request for the withdrawal of provisions from the Food and Feed Safety Omnibus

Dear Commissioners,

We, the undersigned environmental protection, public health, farmer, and patient organizations, **wish to express our deep concern about the core measures** contained in the omnibus food and feed safety, **which would eliminate periodic reevaluations of authorized active substances and prevent independent scientific advances from being taken into account.**

We therefore formally call for the withdrawal of this proposal, which would lead to the **deregulation of the pesticide market** and **significantly undermine Member States' sovereignty**, limiting their capacity to protect biodiversity and the health of European citizens.

This request is part of a **collective mobilization** that builds upon the appeals already sent by the French NGO Génération Future, signed by [50 French associations](#) and the European organization [PAN Europe](#) to the French government and the Commissioners.

A [petition](#) has been launched in support of this letter by the french NGO POLLINIS and has collected more than **65,000 signatures in less than 3 days.**

In light of the complexity of the issues at stake, and the fact that they do not cover the same realities in all Member States, we are convinced that they must be addressed at the European level. However, **the freedom of Member States to protect the health of their citizens and their biodiversity must also be safeguarded, in accordance with the principle of subsidiarity.**

We call on you to **immediately remove the most harmful measures from this text:**

- **The removal of periodic reviews for active substances**

This provision is completely **disproportionate** to the stated objective of the omnibus text, which is to simplify regulation. It also **contradicts the stated objective of maintaining a high level of protection** for health and the environment.

The European Commission itself emphasized in its **REFIT 2020 report (1)** on Regulation 1107/2009 that **the periodic review process, combined with strict authorization criteria, has strengthened the level of protection in the European Union**. It is precisely thanks to these regular reviews that 31 hazardous substances have been identified and banned since 2011, including chlorpyrifos (neurotoxic), mancozeb (endocrine disruptor and toxic to reproduction), and several neonicotinoids that are highly toxic to pollinators (2).

Without the automatic requirement for industry to submit updated toxicity data upon renewal, it is likely that **little new information on substances - stemming primarily from independent scientific literature - will be produced over time**.

Furthermore, **the re-evaluation schedule would be left to the discretion of the Commission and Member States**, which could allow substances to remain on the market for years without adequate evaluation. **This process is likely to be influenced by political and resource-based considerations**, to the detriment of a strictly scientific approach.

We cannot maintain on the market substances whose authorization is based on decades-old rules and which benefit from regulatory-induced rent. In reality, no pesticide—whether old or new—is assessed in compliance with Regulation (EC) No 1107/2009, notably due to the absence of chronic toxicity analyses and tests on complete formulations. This flawed system perpetuates the use of products that are harmful to human health and to living ecosystems and **discourages innovation towards genuinely less toxic alternatives**.

On the other hand, **the assumption that new active substances will systematically have improved toxicological and ecotoxicological properties is unfounded**. It is essential to maintain a high level of control to encourage innovation towards truly sustainable methods, which do not always involve the development of a new substance.

- **Limiting the taking into account of scientific knowledge**

Science progresses much faster than regulation. It is therefore imperative to be able to regularly incorporate new knowledge. It is very common for substances initially authorized in the EU to be subsequently considered harmful during their renewal process, as new scientific data becomes available.

In its *Blaise* ruling of October 1, 2019, the Court of Justice of the European Union reiterated that the precautionary principle requires the use of “the most reliable scientific data available and the most recent results of international research” (3). The decision of the Paris Court of Appeal of September 3, 2025, obtained by the *Justice pour le Vivant* coalition, is consistent with this finding.

- **Extension of grace periods**

If a pesticide is banned for reasons of human or environmental health, **we cannot deliberately choose to extend its use disproportionately**, at the risk of endangering farmers, ecosystems, and citizens. Extending these periods to up to three years would run counter to any protection objective.

- **Definition of biocontrol products**

Biocontrol products are not inherently risk-free. **The definition proposed in the text is too broad** and could include a large number of substances that are potentially harmful to non-target organisms or environments. **Products derived from biotechnology**, in particular new genomic techniques, **must be excluded**: these technologies require specific, independent, and rigorous assessments.

- **General deregulation of biocontrol products**

We consider the provisions weakening the regulation of biocontrol products to be particularly problematic, as they are based on the unfounded assumption that these products pose little danger. These measures disregard the fundamental principles of risk assessment and considerably restrict the room for maneuver, and thus the sovereignty, of Member States.

Overall, we are convinced that this text poses structural threats to the health of citizens, both farmers and consumers, and to biodiversity.

The proposal is presented without an impact assessment and appears disproportionate in relation to the stated objective of simplification. It contradicts the objective of maintaining a high level of protection based on the precautionary principle. Without guarantees regarding the risks, this is not simplification, but deregulation.

The objective of improving the competitiveness of European agriculture can be achieved in other ways: agroecology is just as productive as conventional agriculture when externalities are taken into account. More economical, more autonomous, and biodiversity-friendly agriculture can also improve citizens' health, farmers' incomes (4), and **the economic resilience of the Union**.

Pesticide-free agriculture would also **reduce Europe's dependence on fossil fertilizers and imported** phosphates, for example from Russia and Algeria. Learning to do without them is a **strategic necessity**.

Citizens expect Europe to protect them. The Commission had begun to deliver on this with the Green Deal and the Farm to Fork strategy, which, to our regret, have been abandoned. Citizens' expectations are immense.

Let us remember that:

- Between 70% and 80% of flying insect biomass has disappeared in a few decades, according to a study conducted in 16 mainly European countries (5).
- Yet, pollinators are essential: 75% of our crops and nearly 90% of wild flowering plants depend on animal pollination (6).
- 97% of the 201 agricultural soils studied in 10 European countries contain pesticide residues, and 88% contain combinations of several molecules (7).
- France recognizes the link between several diseases and occupational exposure to pesticides: Parkinson's disease (since 2012), malignant blood disorders (2015), and prostate cancer (2021).

We must not allow the short-term profits of a few industrial groups to outweigh the sometimes irreversible and inestimable costs borne by the community: irreparable pollution, loss of biodiversity, and reduced life expectancy for farmers.

Solutions exist and must be supported through coherent and effective public policies.

It is essential to **strengthen the resources of EFSA and national health agencies** to ensure that pesticide reviews are carried out on time, rather than eliminating the reviews altogether. According to our estimates, the work of approximately 50 additional scientists would make it possible to clear the current backlog. As noted by the European Commission itself in its REFIT 2020 report (1), **Member States should review the fees** they charge industry to ensure that they fully cover the operating costs of their health agencies.

Furthermore, we call for the application of EFSA's 2013 Bee Guidance to **ensure proper risk assessment.**

Finally, **we call on the Commission to resume its groundwork to initiate a gradual phase-out of pesticides**, in particular by funding research into agroecology and reforming the CAP to support farmers. This is a realistic prospect for European agriculture by 2050, according to the forward-looking work of INRAE, the French research institute for agriculture, food, and the environment, provided that consistent and coordinated public policies are in place.

In conclusion, we would like to emphasize that **more and more citizens are aware that this Commission proposal goes against the precautionary principle that is so dear to them.** It runs counter to their long-standing and constant demands for stricter regulation of pesticides and the phasing out of synthetic pesticides.

In 2025, French citizens mobilized en masse against the return of acetamiprid to their country: **the petition against the Duplomb law gathered [two million signatures](#).**

We are ready to take this movement to the European level to defend public health, biodiversity, and an ambitious vision for the agricultural future of the European Union.

We thank you for your attention to our concerns and remain fully available to contribute to the work in progress.

Yours sincerely,



Lorraine Alsace

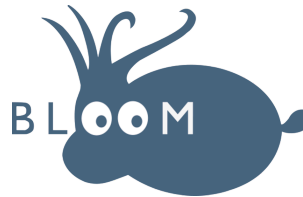
POLLINIS
STOPPONS L'EXTINCTION DES POLLINISATEURS



& PERTURBATEURS ENDOCRINIENS



Apivia Macif Mutuelle



Préserver la biodiversité

Lutter contre le frelon à pattes jaunes

Association reconnue d'intérêt général



COORDINATION SANTÉ ENVIRONNEMENT RHÔNE-NORD



Reference List

- (1) *Evaluation of Regulation (EC) No 1107/2009 on the placing of plant protection products on the market and of Regulation (EC) No 396/2005 on maximum residue levels of pesticides* (2020). Luxembourg: Publications Office.
- (2) Pan Europe, Générations Futures, *Food and feed safety omnibus' threatens pesticide rules*, 2025 december
- (3) Case Blaise, C-157/18, Judgment of 1 October 2019, Court of Justice of the European Union (CJEU).
- (4) Knuth, D. *et al.* (2024) "Pesticide Residues in Organic and Conventional Agricultural Soils across Europe: Measured and Predicted Concentrations," *Environmental Science & Technology*, 58(15), pp. 6744–6752.
- (5) Molenaar, E. *et al.* (2024) "Neonicotinoids Impact All Aspects of Bird Life: A Meta-Analysis," *Ecology Letters*, 27(10), p. e14534.
- (6) Møller, A.P. *et al.* (2021) "Abundance of insects and aerial insectivorous birds in relation to pesticide and fertilizer use," *Avian Research*, 12(1), p. 43.
- (7) Commissariat Général au Développement Durable. (2017) *Théma - Les systèmes économes et autonomes agricoles*.