

COMMITTEE ON AGRICULTURE AND RURAL DEVELOPMENT
THE CHAIR

Ms Stella Kyriakides
Commissioner for Health and Food Safety

D 303591 17.04.2024

Mr Janusz Wojciechowski
Commissioner for Agriculture

IPOL-COM-AGRI D(2024) 12956

Subject: Availability of plant protection products in the EU

Dear Commissioner Kyriakides,
Dear Commissioner Wojciechowski,

We would like to draw your attention to recent figures on pesticide authorisation. The unprecedented agricultural crisis we are experiencing and the concern of our farmers about the shortage of substances available to fight pests should alert us and lead us to reconsider our pesticide authorisation processes.

The recent AgbioInvestor study underlines that the pesticide authorisation system takes too long: 12 years from the first synthesis of a new plant protection molecule to its launch on the market. The authorisation and registration processes are longer; even the development of biological alternatives takes longer than before: 8 years in 1995 whereas today a company that has found a new substance will probably not be able to market it before 2040.

We have seen that the European Union increasingly limits the possibility to introduce derogations.

Furthermore, if new studies emerge to address the security concerns that have led to a pesticide's ban, companies must seek reauthorisation for its use. However, if companies fail to apply for reauthorisation, the pesticide remains banned. Therefore, the European Commission has no control over the reauthorisation of pesticides. This is the clear recent lesson from the tricyclazole case.

In the coming years the European Union will have to decide on the authorisation and reauthorisation of a large number of pesticides. We therefore run the risk of having no more solutions if we ban them. We therefore call on the European Commission to apply the following strict principles:

- no pesticides should be banned unless a similar, sustainable and affordable alternative, with at least the same level of efficacy, is already on the market;
- an assessment of the environmental impact of alternative pest control strategies is carried out;
- an assessment of the economic implications on the sector is carried out.

The viability of farms is at stake, because for some recently introduced pests and insects, we only have one authorised pesticide. There is therefore a risk that resistance to this pesticide will develop and the farmer will be left completely unprotected. Having several alternatives is a guarantee of sustainability. There are appropriate risk mitigation measures beyond the ban, including by limiting the use of these substances through maximum residue levels, by laying down stricter periods of application, and/or by limiting the frequency of application, and/or precision farming techniques.

We also need to address flexibility in the existing zoning maps, to allow, for example, the use in northern Europe of a pesticide adapted to drought situations, and currently only authorised in southern Europe. Climate change is fast. Let's help our farmers to maintain their yields.

Dear Commissioners, urgent action is needed, to be taken by the beginning of the next mandate at the latest.

Yours sincerely,

A handwritten signature in black ink that reads "Norbert Lins". The signature is written in a cursive, slightly slanted style.

Norbert Lins



Ms Stella Kyriakides^[1]
 Commissioner for Health and Food Safety

May 16th, 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 17th, 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 health¹ and the environment². The European continent has witnessed a decline of 80% in total flying insect biomass in the last 30 years³, 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,

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

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

³ <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 XXIst 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 farming⁴. 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 XXIst 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).

⁴ 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

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