



Brussels, 15 December 2023

Commissioner Stella Kyriakides
Directorate-General for Health and Food Safety
European Commission
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Subject: Stop the extinction of insects - new guidance on terrestrial ecotoxicology is a must

Dear Commissioner Kyriakides,

Pesticide Action Network Europe is reaching out to you regarding the urgent need for a new Guidance Document on terrestrial ecotoxicology assessment for the European pesticide authorisation procedure. It is evident that the current [2002 version](#) does not serve its purpose to protect biodiversity. Insects are massively dying, even in protected areas: [a German research found](#) more than 75 percent decline over 27 years in total flying insect biomass. European citizens are concerned about biodiversity loss. According to [Eurobarometer \(2019\)](#), 96% of citizens believe that we have a responsibility to protect nature.

In light of the poor state of insects and biodiversity in agricultural areas and their surroundings, it is unacceptable that the [current guidance](#) document allows that all insects in the crop field can be killed in every pesticide application on the assumption they will return later ("recovery"). The guidance document was prepared and adopted under totally unacceptable conditions as regards transparency, independence, latest scientific knowledge and participation and as a result it is far from being in line with current science. Its design took place during the EPPO/SETAC meetings ('named 'ESCORT'), which were chaired by a Novartis-employee and included a range of other industry-employees (from Novartis, Bayer, Zeneca and Rhone-Poulenc), while other stakeholders were not invited. Having guidelines for pesticide

assessment co-written by the industry, has resulted in the approval of pesticides that are highly toxic for terrestrial organisms.

PAN Europe welcomes the announcement that the revision of the guidance document on terrestrial ecotoxicology now stands as a priority for DG SANTE, nevertheless the concrete progress is still unknown and we would like to understand why there is no sign of your services sending out a mandate to EFSA.

Therefore, we call upon the Commission for an urgent revision of the guidance document on terrestrial ecotoxicology with independent scientists with a proven track record of published peer-reviewed articles in scientific journals and who never worked for industry nor did any consultancy for industry in their entire career. The guidance document and protocols for risk assessment should be in place by the end of 2024, therefore we ask you to send such a mandate to EFSA without further delay and insist that the guidance is finalised in 2024, together with the necessary testing protocols for risk assessment.

Yours sincerely,
Hans Muilerman

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