

17 February 2025

**To: College of Commissioners
European Commission
1049 Brussels (Belgium)**

Subject: VISION for AGRICULTURE - Unscientific approach on Pesticides - Please AMEND the text.

Dear Commissioner,

PAN Europe welcomes the European Commission's efforts to develop a Vision for Agriculture and Food. EU farmers and the food sector need a clear long-term vision to transition towards sustainable food systems. In this period of global geopolitical instability, it is also of **major importance that EU policies remain science-based, while taking citizens' will into account.** We are thus writing to you to respectfully ask you to ensure that the proposal text for the EU Vision for Agriculture and Food is amended, in order to address the unscientific narrative present in the draft version, as reported on by Euractiv and Politico¹.

Indeed, this version bases its pesticide policy on an **unscientific paradigm**, that has been long promoted by the pesticides industry: the statement that banning pesticides leads to yield reduction and that alternatives would not exist:

"...However, the introduction of alternatives in a form of biological or innovative low-risk plant protection products has not followed with the same pace as the withdrawal of active substances from the EU market. If this trend continues, it can affect the EU's ability to ensure food production. The Commission will therefore carefully consider any further ban of pesticides if alternatives are not available within a reasonable time and at reasonable cost, unless the pesticide in question represents a threat to human health or to the very biotopes agriculture relies upon for its viability."

This statement is not supported by scientific evidence, on the contrary. **Eurostat statistics show that despite the bans on toxic pesticides that have occurred over the last 20 years, agricultural yields have not gone down.** The argument of a lack of alternatives is a narrative pushed forward by the pesticide industry, and regularly repeated by intensive farming lobbies. It is however contradicted by science. Available scientific information shows that non-chemical alternatives exist and that, if implemented, they lead to 50-80% reduction in pesticide use, without a significant reduction in yields. This section of the Vision also shows a problematic lack of

¹ Leaked draft EU Vision on Agriculture and Food by POLITICO, 13 February 2024
[Draft Commission farm vision promises tough trade rules on pesticides, livestock, Euractiv, 13 February 2024](#)

recognition of the efforts and innovative, pioneering work of many farmers across Europe, including the work done under EU-funded research projects². Many are already implementing and combining Integrated Pest Management (IPM), agroecological, regenerative, conservation and organic practices, as well as biocontrol, long-established agronomic practices as well as sustainable technology. These farmers demonstrate that ambitious pesticide reduction, both quantitatively and qualitatively, is possible, while increasing resilience and maintaining stable yields and profitability. Incorporating this industry-promoted false narrative in the Vision for Agriculture and Food does not do justice to farmers and science.

Furthermore, when banning a toxic pesticide, **the "substitution principle" is not supported by the EU pesticide legislation**. If a pesticide is excessively toxic to health and the environment, or leaks into groundwater, it must be banned, according to regulation (EC) 1107/2009. Available examples of mandatory substitutions for the EU-approved more toxic pesticides, namely the Candidates for Substitution that need to be substituted at Member States level turned out to be a **complete failure**, as already acknowledged by the European Commission.

The draft Commission text also contradicts the outcome of the Strategic Dialogue on Agriculture (SDA). The SDA - which the Commission promised to use as the basis for the EU Vision for Agriculture and Food - clearly underlines the need to reduce pesticides, and improve the implementation of existing legislation. Yet, the proposed text regarding the banning of pesticides is in breach with current legislation and undermines the Commission's credibility and its own commitment to transition to truly sustainable food production systems. The Commission states it "*will orient the future CAP away from conditions to incentives*", which undermines the very purpose of the CAP supporting a transition to sustainable agriculture, and setting as a baseline minimal environmental and health protection conditions. It should be evident that all public funds should be linked to public goods. CAP funds should strictly uphold environmental conditionality to ensure preservation of soil health and ecosystem services, and reverse the progressing collapse of biodiversity. **The SDA underlines that maintenance and enforcement of existing legislation is key, and that farmers should have a clear overview of all key EU and national environmental, animal welfare and employment legislation applicable, which must be translated into clear and actionable on-farm obligations.**

EU law is clear: priority must be given to the protection of human health and the environment: Seeking for available alternatives before banning a pesticide, gives priority to plant production over the protection of health and the environment, which contradicts the provisions of the EU law on pesticides. Indeed, under the Pesticides Regulation 1107/2009 the objective of **protecting human and animal health and the environment should 'take priority'** over the

² <https://ipmworks.net/>

objective of improving plant production, as it was recently **clarified by the European Court of Justice**³. Any attempt to put plant production first is a breach of EU law.

Pesticide reduction constitutes a very strong societal demand. Eurobarometer surveys, consultations (e.g. the Conference for the Future of Europe), an IPSOS poll⁴, two European Citizens' initiatives (ECIs 'Save Bees and Farmers' and 'Stop Glyphosate'), as well as numerous petitions have consistently shown that Europeans are deeply worried about the harmful impact of pesticides on the environment, biodiversity and human health, and ask for swiftly transitioning away from pesticides, while supporting our farmers in their efforts.

PAN Europe respectfully asks you to act to correct this unscientific approach and to listen to the voice of citizens, while remaining in line with EU law.

Kind regards,

Martin Dermine
Executive Director
PAN Europe

³ PAN Europe Case C-162/21

<https://curia.europa.eu/juris/document/document.jsf?text=&docid=269405&pageIndex=0&doclang=en&mode=lst&dir=&occ=first&part=1&cid=5866>

⁴ <https://www.pan-europe.info/resources/reports/2023/10/pesticides-play-it-safe>