

European Commission  
President Ursula von der Leyen  
Directorate-General for Health and Food Safety  
B-1049 Brussels  
Belgium

Brussels, 15 December 2023

**Subject: Maintaining the European Commission proposal for a Regulation on the Sustainable Use of Plant Protection Products (SUR)**

Dear President von der Leyen,

We, the undersigned organisations, representing farmers, consumers, health, environmental, trade and human rights organisations, are writing to express our collective support for an ambitious Sustainable Use of Plant Protection Products (SUR) proposal. While we acknowledge the European Parliament's recent decision not to adopt a proper position, we nevertheless firmly believe that the issues addressed in the SUR proposal are of utmost importance for the health of citizens, the preservation of nature, halting and reversing the collapse of biodiversity, and therefore maintaining productive and resilient agro-ecosystems to ensure food security.

EU citizens have a large and growing awareness of the issues and they continue to demand effective measures to reduce the use and the risk of pesticides, as evidenced by indicators such as two European Citizens' Initiatives (ECI) "[Save Bees and Farmers](#)" and "[STOP Glyphosate](#)", [EU barometers](#), the [Conference on the Future of Europe](#), and the Ipsos survey "[Play it Safe](#)". These concerns reflect a broader consensus that spans diverse sectors of society including the scientific and health communities:

- The European Citizens' Initiatives "Save Bees and Farmers" and "STOP Glyphosate" are among the few ECIs that succeeded in the EU, illustrating the public's commitment to protecting pollinators, the environment, and importantly the health of farmers and food sector workers. This call for legislative action still remains.
- Additionally, Eurobarometer surveys have consistently demonstrated widespread public concern about the impact of pesticides on health and the environment.
- The Conference on the Future of Europe has provided a platform for citizens to voice their aspirations and they opted for a more sustainable and resilient agricultural system with significant reductions in pesticide use.
- The Ipsos survey report "Play it Safe" further highlights the urgent need for action, as it sheds light on public perceptions and expectations regarding pesticide use. This collective call for a reduction in pesticide usage aligns with the broader global movement toward sustainable agriculture, as outlined in various international agreements and conventions.

Science consistently emphasises the critical need to decrease the use and associated risks of pesticides. Scientists continuously warn<sup>1,2</sup> policy-makers about the detrimental impact of

<sup>1</sup> [Candel, Jeroen](#): Scientists call for ambitious Sustainable Use of Pesticides Regulation

<sup>2</sup> [Pe'er, Guy](#): Scientists support the EU's Green Deal and reject the unjustified argumentation against the Sustainable Use Regulation and the Nature Restoration Law

pesticides on biodiversity<sup>3,4,5</sup>, on ecosystem services and on [food security](#). Protecting the natural resources that are needed for resilient and sustainable food production is paramount in the face of escalating environmental challenges. Pesticides have been linked to adverse effects on human health<sup>6,7,8,9,10,11,12, 13,14,15,16</sup>, biodiversity<sup>17 18</sup>, and [ecosystem stability](#).

The Kunming-Montreal Biodiversity Framework mandates actions on pesticides, intending to reduce the overall use and toxicity of pesticides (pesticide load / toxic load) by at least half by 2030. The central elements of the protocol are transformative actions on pesticide and agricultural sector reform. Without any regulation, reaching the goal of at least 50% reduction is questionable.

Therefore, we urge the European Commission to persist in its efforts to respect these overriding commitments, and not to withdraw the SUR proposal, but to keep working on its essential provisions. It is imperative that the Commission continues to work intensively towards solutions that prioritise the health of citizens, preserve nature, reverse the collapse of biodiversity, and secure long-term food security.

We urge the European Commission to commit to evidence-based policymaking and dedicate its work to safeguard the well-being of present and future generations. As representatives of diverse stakeholders who share a common concern for the sustainability of our food systems, we stand ready to collaborate and support an ambitious SUR proposal.

The European Green Deal is a flagship policy from your Commission that has been positively received by the European population. Thank you for your commitment and work so far, and we look forward to continued collaboration to future-proof EU agriculture and improve health and the environment.

Yours sincerely,

Martin Dermine  
Executive Director  
Pesticide Action Network (PAN) Europe

<sup>3</sup> More than 75 percent decline over 27 years in total flying insect biomass in protected areas

<sup>4</sup> [Rigal et al., 2023](#), Farmland practices are driving bird population decline across Europe

<sup>5</sup> [Brühl et al., 2021](#), Direct pesticide exposure of insects in nature conservation areas in Germany

<sup>6</sup> [Lemarchand et al.](#) Cancer incidence in the AGRICAN cohort study (2005–2011)

<sup>7</sup> [Eriksson et al., 2008](#), Pesticide exposure as risk factor for non-Hodgkin lymphoma including histopathological subgroup analysis

<sup>8</sup> [Nordby et al., 2004](#), Incidence of Lip Cancer in the Male Norwegian Agricultural Population

<sup>9</sup> [Koutros et al., 2013](#), Risk of Total and Aggressive Prostate Cancer and Pesticide Use in the Agricultural Health Study

<sup>10</sup> [Rani et al., 2021](#), An extensive review on the consequences of chemical pesticides on human health and environment

<sup>11</sup> [Chilipweli et al., 2021](#), Maternal pesticide exposure and child neurodevelopment among smallholder tomato farmers in the southern corridor of Tanzania

<sup>12</sup> [Moreira et al., 2021](#), Pesticides and Male Fertility: A Dangerous Crosstalk

<sup>13</sup> [Doğanlar et al.](#), Nonoccupational Exposure of Agricultural Area Residents to Pesticides: Pesticide Accumulation and Evaluation of Genotoxicity

<sup>14</sup> [IPBES 2016](#), Assessment Report on Pollinators, Pollination and Food Production

<sup>15</sup> [Hallmann et al., 2017](#), More than 75 percent decline over 27 years in total flying insect biomass in protected areas.

<sup>16</sup> [Mancini et al., 2023](#), Association between Residential Proximity to Viticultural Areas and Childhood Acute Leukemia Risk in Mainland France: GEOCAP Case-Control Study, 2006-2013

<sup>17</sup> [Clementi et al., 2008](#), Pesticides and fertility: an epidemiological study in Northeast Italy and review of the literature

<sup>18</sup> [Hertoge et al. 2019](#), Pesticide contamination and associated risk factors at public playgrounds near intensively managed apple and wine orchards [Hallmann et al., 2017](#).



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