

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](#).


N°	Name Organization	Email address	Logo Organization	Date
1	PAN Europe	<a href="mailto:martin@pan-europe.info">martin@pan-europe.info</a>		11/12/2023
2	Neo-Agri	<a href="mailto:contact@neo-agri.org">contact@neo-agri.org</a>		11/12/2023
3	Earth Trek (Zemljane staze)	<a href="mailto:info@earthtrek.org">info@earthtrek.org</a>		11/12/2023
4	Coordination gegen BAYER-Gefahren (CBG)	<a href="mailto:info@CBGnetwork.org">info@CBGnetwork.org</a>		11/12/2023
5	ISDE, International Society of Doctors for Environment	<a href="mailto:francesco.romizi@isde.it">francesco.romizi@isde.it</a>		11/12/23
6	Ekō	<a href="mailto:eoin@eko.org">eoin@eko.org</a>		11.12.2023

7	GMWatch	editor@gmwatch.org		11.12.2023
8	Justice Pesticides	contact@justicepesticides.org		11/12/2023
9	Buglife	info@buglife.org.uk		11/12/2023
10	GLOBAL 2000	helmut-burtscher@global2000.at		11.12.2023
11	ROMAPIS	office.romapis@gmail.com		11/12/2023
12	ZERO	pedro.horta@zero.org zero@zero.org		11/12/2023
13	ECO HVAR	contact@eco-hvar.com		11.12.2023

14	ADENY	adeny89@orange.fr		11.12.2023
15	Integrated Resources Management Company Ltd	irmco@environmentalmalta.com		12.12.2023
16	BirdLife Österreich	katharina.bergmueller@birdlife.at		11.12.2023
17	Ecologistas en Acción	quimicos@ecologistasenaccion.org		11.12.2023
18	SEAE- Sociedad Española de Agricultura Ecológica y Agroecología	international@agroecologia.net		11/12/2023
19	Hogar sin Tóxicos	carlos.deprada@hogarsintoxicos.org		12/12/2023

20	Estonian Green Movement	marilin@roheline.ee	 <b>Eesti Roheline Liikumine</b> Estonian Green Movement-FoE	12.12.2023
21	Erde & Saat	plaimer@erde-saat.at		12.12.23
22	AWHHE NGO	officeawhhe@awhhe.am	 Armenian Women for Health and Healthy Environment NGO Հայ կանաչը համուն առողջության և առողջ շրջակա միջավայրի ՀԿ	12.12.23
23	BeeLife	simon@bee-life.eu		12.12.23
24	Pesticide Action Network Netherlands	pan.netherlands@gmail.com		12.12.2023

25	Nature & Progrès	virginie.pissoort@natpro.be		12.12.23
26	Égalité	egaliteonlus@gmail.com		12.12.2023
27	ECOCITY	eribizani@yahoo.gr		12.12.2023
28	Child Rights International Network (CRIN)	suzanne@crin.org		12.12.2023
29	Voedsel Anders	ingrid.pauwels@voedsel-anders.be		12.12.2023
30	ÖKOBÜRO – Allianz der Umweltbewegung	office@oekobuero.at		12.12.2023
31	BirdLife Europe and Central Asia	Marilda.Dhaskali@birdlife.org		12.12.2023

32	ELTE Nature Conservation Club	moravera00@gmail.com		12.12.2023
33	ÄrztInnen für eine gesunde Umwelt	info@aegu.net		12.12.2023
34	Women Engage for a Common Future (WECF) International	<a href="mailto:janna.lenders@wecf.org">janna.lenders@wecf.org</a>		12.12.2023
35	Natagora	gaetan.seny@natagora.be		12.12.2023
36	Velt	yacine@velt.nu		12.12.2023
37	Caring Farmers	info@caringfarmers.nl		12.12.2023








38	Public Eye	laurent.gaberell@publiceye.ch		12.12.2023
39	Bündnis für eine enkeltaugliche Landwirtschaft e.V. (BEL)	info@enkeltauglich.bio		12.12.2023
40	Društvo Šolski ekovrtovi - Association Organic Gardens for Education	anamarija.slabe@itr.si		12. 12. 2023
41	Slow Food	<a href="mailto:g.gouet@slowfood.it">g.gouet@slowfood.it</a>		12.12.2023
42	Rete Semi Rurali ETS	info@semirurali.net		12.12.2023






43	Coalizione CambiamoAgricoltura	federica.luoni@lipu.it	 <p><b>CAMBIAMO AGRICOLTURA!</b></p>	12.12.2023
44	Federazione Nazionale Pro Natura	info@pro-natura.it		12/12/2023
45	Le Zolle s.r.l.	simona@zolle.it		12/12/23
46	Lipu	federica.luoni@lipu.it		12.12.2023
47	FIAN Austria	tina.wirnsberger@fian.at	 <p><b>FIAN AUSTRIA</b></p>	13.12.2023

48	Transitiecoalitie Voedsel	lara@transitiecoalitievoedsel.nl		13.12.2023
49	POLLINIS	barbarab@pollinis.org		13.12.2023
50	Legambiente	damiano.disimine@legambientelombardia.it		13.12.2023
51	European Environmental Bureau	celia.nyssens@eeb.org		13.12.2023
52	Pestizid Aktions-Netzwerk e.V. (PAN Germany)	susanne.smolka@pan-germany.org		13.12.2023
53	Deutscher Naturschutzring e.V.	lavinia.roveran@dnr.de		14.12.2023
54	Zoologisch-Botanische Gesellschaft in Österreich	elisabeth.haring@nhm-wien.ac.at		14.12.2023

55	Institute for Agriculture and Trade Policy Europe	sscherger@iatp.org	 <p>Institute for Agriculture &amp; Trade Policy EUROPE iatp.org</p>	14.12.2023
56	NOAH - Friends of the Earth Denmark	june@noah.dk	 <p><b>NOAH</b> Friends of the Earth Denmark</p>	14.12.2023
57	Latvian Fund for Nature	ldf@ldf.lv	 <p>Latvijas Dabas fonds</p>	14.12.2023
58	Corporate Europe Observatory (CEO)	nina@corporateeurope.org	 <p>CEO</p>	14.12.2023
59	EPBA	epba@imkerei-technik.de	 <p>European professional beekeepers association e.p.b.a.</p>	14.12.2023
60	Iles de Paix	alice.jandrain@ilesdepaix.org	 <p>iles de paix</p>	14.12.2023

61	Générations Futures	<a href="mailto:plaidoyer@generations-futures.fr">plaidoyer@generations-futures.fr</a>		14.12.2023
62	Coalición Por Otra PAC	<a href="mailto:contacto@porotrapac.org">contacto@porotrapac.org</a>		14.12.2023
63	Natuurpunt VZW	<a href="mailto:stijn.leestmans@natuurpunt.be">stijn.leestmans@natuurpunt.be</a>		14.12.2023
64	Clean Air Action Group	<a href="mailto:lukacs@levego.hu">lukacs@levego.hu</a>		14.12.2023
65	Agroecology Europe	<a href="mailto:henriette.christensen@agroecology-europe.org">henriette.christensen@agroecology-europe.org</a>		14.12.2023
66	Coalition Living Earth	<a href="mailto:koalicjazywaziemia@gmail.com">koalicjazywaziemia@gmail.com</a>		14.12.2023
67	Hungarian Society for Environmental Education	<a href="mailto:mkne@mkne.hu">mkne@mkne.hu</a>		14.12.2023.

68	Polish Ecological Club	biuro@pkegliwice.pl		14.12.2023
69	Magyar Természetvédők Szövetsége (Friends of the Earth Hungary)	fidusz@mtvsz.hu		14.12.2023
70	Czech Society for Ornithology	verm@birdlife.cz		14. 12. 2023
71	Fondation pour la Nature et l'Homme	e.armaroli@fnh.org		14.12.2023
72	Polish Society for the Protection of Birds	aleksandra.krol@otop.org.pl		14.12.2023
75	Povod Institute, Slovenia	povod@povod.si		14.12.2023
76	LPN - Liga para a Protecção da Natureza	geral@lpn.pt		14.12.2023

77	Humundi	jja@humundi.org		14.12.2023
78	DOF BirdLife	knud.flensted@dof.dk		14/12/2023
79	Union Nationale de l'Apiculture Française (UNAF)	clemence.remy@unaf-apiculture.info		14/12/2023
80	Umweltinstitut München e.V.	vf@umweltinstitut.org		14/12/2023
81	Via Pontica Foundation	office@viapontica.org		14/12/2023