



To: Members of the SCoPAFF - Section "Phytopharmaceuticals - Legislation"

Brussels, 5 March 2026

**Subject:** EU Standing Committee on Plants, Animals, Food and Feed (SCoPAFF); 10-11 March 2026; position of Pesticide Action Network (PAN) Europe

Dear Members of the Standing Committee on Plants, Animals, Food and Feed,

On 10 and 11 March, you are invited to the EU Standing Committee on Plants, Animals, Food and Feed to discuss and potentially adopt opinions on several European Commission proposals. Ahead of this meeting, we would like to share PAN Europe's position on key issues concerning human health and environmental protection from pesticides. We kindly request that you give these matters your careful attention.

#### **Agenda issues**

1. Draft Commission Implementing Regulation (EU) amending Regulation (EU) No 540/2011 implementing Regulation (EC) No 1107/2009 as regards the extension of the approval periods of a series of concerning active substances (B.07)
2. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance **flutolanil** (C.01)
3. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance **buprofezin** (C.02)
4. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance **pirimicarb** (C.04)
5. Draft Commission Implementing Regulation (EU) approving **pydiflumetofen** as a candidate for substitution (C.05)
6. Draft Commission Implementing Regulation (EU) renewing the approval of the active substance **mecoprop-P** (C/06)
7. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance **triclopyr** (C.07)
8. **Omnibus Simplification Package** (A. 03)
9. EFSA conclusions: cinmethylin, penoxsulam, halosulfuron-methyl, phenmedipham, diflufenican (A.04)
10. Draft renewal reports: cyprodinil, fludioxonil, and fenoxaprop-P-ethyl (A.05)

11. Article 21: **flupyradifurone** (A.11)

**1. Draft Commission Implementing Regulation (EU) amending Regulation (EU) No 540/2011 implementing Regulation (EC) No 1107/2009 as regards the extension of the approval periods of the active substances bensulfuron, benzovindiflupyr, chlorotoluron, clethodim, cycloxydim, cymoxanil, dazomet, deltamethrin, diclofop, fenazaquin, fluopicolide, hymexazol, lambda-cyhalothrin, MCPA, MCPB, metaldehyde, metsulfuron-methyl, paclobutrazol and tebuconazole (B.07)**

The legality of the automatic and repeated extensions of the approvals of active substances has been previously questioned by PAN Europe and other NGOs, through requests for internal review, which the Commission has rejected. In a recent judgement<sup>1</sup> of three Cases (Cases T-412/22, T-94/23, T-565/23) against the Commission, brought before the General Court of the European Union by PAN Europe, Pollinis France and Aurelia Stifing, respectively, the Court sided with the NGOs. The General Court clarified that such extensions must be exceptional and temporary in nature and not systematic, as well as tailored to the concrete progress of the risk assessment. Furthermore, the Court calls upon the Commission to assess objectively and concretely, the role of the applicant in the delays occurring in such procedures, and whether it contributed to the delay by providing data of inadequate quality.

We acknowledge the Commission's recognition that the [draft implementing regulation](#) is intended to be temporary and exceptional, and that the approval periods of active substances should be extended only for the duration assessed as necessary in each specific case, based on the information available at the time. Nevertheless, we consider it highly concerning to extend the approval of substances of concern. This applies, in particular, to:

- Benzovindiflupyr: approved as candidate for substitution because it fulfils two PBT criteria.
- Chlorotoluron: approved as candidate for substitution because it fulfils two PBT criteria.
- Deltamethrin: raising [developmental neurotoxic concerns](#).
- Fluopicolide: approved as candidate for substitution because it fulfils two PBT criteria; meeting the PFAS definition.
- Lambda-cyhalothrin: approved as candidate for substitution due to its low ADI/ARfD/AOEL values and because it fulfils two PBT criteria; meeting the PFAS definition. In the scientific literature, it is consistently identified as having endocrine-disrupting and neurotoxic properties. It is also included on the "[Toxic 12](#)" list published by PAN Europe, which identifies priority pesticides that should be banned immediately.

Extending approvals for these substances risks undermining the precautionary principle and weakening the protection of human health and the environment.

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<sup>1</sup> <https://curia.europa.eu/jcms/upload/docs/application/pdf/2025-11/cp250143en.pdf>

## 2. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance flutolanil (C.01)

PAN Europe reiterates its support for the proposal for non-renewal of the approval of flutolanil. Flutolanil meets the OECD definition of PFAS because it contains a trifluoromethyl group (-CF<sub>3</sub>) bound to a carbon atom. It has been identified as persistent (P) to very persistent (vP) by EFSA.

Moreover, due to its molecular structure (-CF<sub>3</sub> group), and as confirmed by [EFSA](#), flutolanil eventually breaks down into trifluoroacetic acid (TFA), contaminating crops, soil and water resources. TFA is an ultra-short PFAS, highly persistent, mobile, and soluble in water, which is currently undergoing assessment for its harmonised classification as Persistent, Mobile and Toxic (PMT), very Persistent very Mobile (vPvM) and toxic for reproduction category 1B. The latter proposed classification is based on evidence of clear developmental toxicity, including malformations of the eyes and skeletal system in rabbit offspring. TFA also impacts sperm quality and the thyroid hormone system in rats.

This results in TFA being a 'relevant' metabolite, according to Article 3, point 32 of Regulation (EC) No 1107/2009, which means the 0.1 µg/L groundwater limit applies to TFA. Alarmingly, TFA contamination in groundwater routinely exceeds this limit for relevant metabolites<sup>2</sup> and, in some cases, surpasses even the 10 µg/L threshold for non-relevant metabolites in groundwater<sup>3</sup>. A recent [study](#) by Diehle *et al.* has provided the first quantitative estimation of TFA emissions leaching into groundwater as a direct result of crop applications of 24 EU-approved PFAS pesticides, including flutolanil. For flutolanil, when representative uses on flowers and potatoes were considered, the resulting TFA leaching potential was estimated to be high (≥ 10 µg/L) according to the FOCUS modeling approach.

According to recent scientific warnings, TFA poses a serious [threat to planetary boundaries](#), as most of the TFA released today will persist in the environment for future generations. Continued use of TFA-emitting substances will lead to the accumulation of this truly forever chemical in our environment. This constitutes a clear indication of a violation of the Pesticide Regulation (EC) 1107/2009, namely its Article 4(3), stating pesticides shall have no immediate or delayed effects on human health, directly or through drinking water, or on groundwater. TFA-emitting substances, including flutolanil, constitute a clear risk for citizens and groundwater and should be banned.

We call on you to **support** the Commission's proposal for **non-renewal of flutolanil**.

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<sup>2</sup> [Austria](#), [Denmark](#)

<sup>3</sup> [Germany](#), [Sweden](#), [Switzerland](#).

### **3. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance buprofezin (C.02)**

PAN Europe reiterates its support for the proposal for non-renewal of the approval of buprofezin, which has been identified as meeting the endocrine disruption (ED) criteria for humans, in accordance with point 3.6.5 of Annex II to Regulation (EC) No 1107/2009. The substance was found to disrupt the Hypothalamic-Pituitary-Thyroid (HPT) axis, causing adverse effects on thyroid indicated by alternations in thyroid weight and thyroid histopathology. As substances that alter thyroid function may result in neurodevelopmental toxicity, the use of this substance should stop immediately.

We call on you to **support** the Commission's proposal for non-renewal of buprofezin.

### **4. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance pirimicarb (C.04)**

PAN Europe supports the proposal for non-renewal of the approval of pirimicarb. Pirimicarb has been approved as a candidate for substitution, as it meets two of the criteria for being Persistent, Bioaccumulative and Toxic (PBT). In addition, it is classified as Carcinogen Category 2 and is very toxic to aquatic life. Due to these serious concerns, pirimicarb has been included in PAN Europe's list of the "[Toxic 12](#)" pesticides identified for immediate ban since 2021.

In its [peer-review conclusions](#) published in September 2024, EFSA confirmed that pirimicarb clearly does not meet the approval criteria laid down in Regulation (EC) No 1107/2009. EFSA identified as a critical area of concern the high risk to aquatic organisms in the majority of assessed scenarios, even when maximum risk mitigation measures were applied, and for all representative uses.

Furthermore, EFSA identified several issues that could not be finalised. The phototoxicity and photomutagenicity potential of pirimicarb could not be excluded. Its developmental neurotoxicity potential has not been adequately addressed. In addition, the consumer risk assessment could not be finalised. Significant data gaps also remain regarding risks to honey bees and other non-target organisms, including soil-dwelling organisms. Moreover, no conclusion could be drawn as to whether pirimicarb meets the criteria for endocrine disruption for non-target organisms.

Taken together, these findings demonstrate that pirimicarb poses unacceptable risks to the environment and potentially to human health. This is in clear contradiction with Article 4 of Regulation (EC) No 1107/2009, which requires that active substances shall have no harmful effects on human health or on the environment.

We call on you to **support** the Commission's proposal for non-renewal of pirimicarb.

## **5. Draft Commission Implementing Regulation (EU) approving pydiflumetofen as a candidate for substitution (C.05)**

PAN Europe calls on the Member States to refuse the approval of pydiflumetofen, a succinate dehydrogenase inhibitor (SDHI) fungicide, on the grounds of its very high persistence in the environment, which constitutes an unacceptable effect in itself. This position is fully aligned with growing scientific consensus that persistence alone is sufficient to justify regulatory action, as highly persistent substances inevitably accumulate in the environment, leading to long-term and potentially irreversible impacts on human health and ecosystems. Allowing the approval of such substances directly contradicts the preventive and precautionary principles underpinning EU pesticide legislation.

We call on you to **reject** the Commission's proposal for approval of pydiflumetofen.

## **6. Draft Commission Implementing Regulation (EU) renewing the approval of the active substance mecoprop-P (C.06)**

In October 2023, EFSA published its updated peer-review conclusions on mecoprop-p and identified a critical area of concern related to resident exposure. The predicted exposure for children entering treated areas exceeds the AOEL (75th percentile), even when applying a 10-metre buffer strip and drift-reduction measures during application. This finding clearly demonstrates that the conditions set out in Article 4 of Regulation (EC) No 1107/2009 are not fulfilled, in particular the requirement that plant protection products and their residues “shall not have any harmful effects on human health, including that of vulnerable groups” (Recital 24; Article 4(2) and (3)).

In addition, under Regulation (EC) No 1272/2007, mecoprop-p is classified as very toxic to aquatic life (Aquatic Acute 1) and very toxic to aquatic life with long-lasting effects (Aquatic Chronic 1). It is also classified as harmful if swallowed and as causing serious eye damage. In light of these hazard classifications, it cannot be concluded that the substance does not cause harm to human health or unacceptable effects on the environment.

Despite these serious concerns, the approval of mecoprop-p has been repeatedly extended, amounting to a total prolongation of nine and a half years. It is high time to ensure that citizens, including agricultural workers, as well as the environment, are no longer exposed to this hazardous substance.

We therefore call on you to **reject** the Commission's proposal to renew mecoprop-p.

## 7. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance triclopyr (C.07)

PAN Europe supports the proposal for non-renewal of the approval of triclopyr. In its [peer review conclusions](#) published in July 2024, EFSA identified several critical areas of concern for triclopyr. These consist of a high acute and long-term risk to mammals and a high risk to non-target arthropods.

EFSA also highlighted issues that could not be finalised. Toxicity data necessary to assess risks to aquatic organisms are lacking. Importantly, no safe uses were identified in relation to the exposure of residential children when using the EFSA exposure model, even after applying available risk mitigation measures. Additional data gaps further prevent a comprehensive evaluation of the risks.

These findings indicate that triclopyr poses unacceptable risks to human health and the environment. Its continued approval would therefore be inconsistent with the requirements of Article 4 of Regulation (EC) No 1107/2009, which requires that active substances must not have harmful effects on human health or the environment.

We call on you to **support** the Commission's proposal for **non-renewal of triclopyr**.

## 8. Omnibus Simplification Package (A. 03)

The European Commission's proposal for a food and feed safety omnibus<sup>4</sup> represents a significant weakening of EU pesticide law. Contrary to the Commission's claims, it is a clear step backwards for the protection of human health, the environment, and farmers themselves from toxic pesticides. As Member States, you have a critical responsibility to prevent this erosion of hard-won safeguards enshrined in Regulation (EC) No 1107/2009.

A [legal opinion](#) commissioned by several German NGOs warns that the Commission's plans would "significantly lower the level of protection in the fields of health and environmental protection". The opinion raises serious doubts about the proposal's compatibility with the precautionary principle and the high level of protection for health and the environment guaranteed under EU primary law.

Most concerningly, the proposal would make unlimited approval of pesticide active substances the default, while limited approval would become the exception, applied only to certain categories of substances (candidates for substitution, harmful substances approved by derogation, and substances with "relevant uncertainties") (Articles 4 and 14). The periodic reassessment system is crucial for integrating new scientific evidence that may reveal

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<sup>4</sup> [Proposal for a regulation amending Regulations 999/2001, 1829/2003, 1831/2003, 852/2004, 853/2004, 396/2005, 1099/2009, 1107/2009, 528/2012, 2017/625; Proposal for a directive amending Council Directive 98/58/EC and EP and Council Directive 2009/128/EC.](#)

previously unknown toxicity. . Since 2011, 54 substances, including 31 that were not approved as candidates for substitution, have been identified as harmful and banned because of this periodic review system. If the Commission's proposal enters into force on 1 January 2027, 49 active substances would automatically receive unlimited approval according to an [analysis](#) by our French member, based on the Commission's staff working document. This list includes glyphosate, PFAS substances such as trifloxystrobin and isoxaflutole, as well as substances raising neurotoxicity concerns, including acetamiprid and folpet.

At the same time, it would restrict Member States from using the latest science during the assessment procedure of pesticide products, even when new evidence indicates serious risks (Article 36). This approach directly contradicts [EU case law](#) and undermines national authorities' ability to thoroughly assess the toxicity of products to protect citizens and the environment as it blocks them from using the most recent science.

The proposal further extends grace periods for substances that no longer meet approval criteria, including for health and environmental reasons, normalising the continued use of hazardous pesticides for up to three years (Article 20). In parallel, it broadens approval derogations from safety criteria under Article 4(7). Under the proposal, substances that fail approval requirements (such as endocrine disruptors and groundwater contaminants) could be approved by derogation not only for serious plant health risks but also for serious risks to plant production. This significantly expands the scope of the derogation, undermining its exceptional nature and contradicting the hierarchy of objectives established in Regulation (EC) 1107/2009, which clearly prioritises human health and environmental protection over production considerations. Moreover, the proposal does not indicate how plant production risks would be assessed.

Regarding biocontrol, while facilitating access to alternatives to synthetic pesticides is welcome, the proposal introduces an insufficiently precise definition of biocontrol active substances, risking the inclusion of synthetically produced substances with harmful properties, including pyrethroids (Article 3). This concern is compounded by the removal of record-keeping obligations (Article 67).

Finally, the proposal fails to meaningfully address pesticide residues in food, continuing to allow residues of EU-banned pesticides in imported products. This approach perpetuates double standards.

We urge Member States to reject this proposal in its current form. The food and feed safety omnibus undermines the precautionary principle, contradicts existing EU law provisions, and ignores citizens' clear and consistent demands for stronger pesticide regulation and a rapid transition away from conventional pesticides. Member States must stand firm to defend EU pesticide standards.

## 9. EFSA conclusions: cinmethylin, penoxsulam, halosulfuron-methyl, phenmedipham, diflufenican (A.04)

**Cinmethylin:** In December 2025, EFSA [concluded](#) that cinmethylin meets the endocrine disruption (ED) criteria for humans for the T-modality, in accordance with point 3.6.5 of Annex II to Regulation (EC) No 1107/2009. Meanwhile, the assessment of cinmethylin's endocrine-disrupting potential for non-target organisms remained inconclusive. Therefore, in line with Article 4 of Regulation (EC) 1107/2009, cinmethylin does not meet the approval criteria to be approved..

According to EFSA the thyroid-mediated adversity was observed in studies of different durations in rats. There was clear and consistent evidence, which consisted of thyroid weight and increased incidence of thyroid follicular cell hypertrophy/hyperplasia, accompanied in one in vivo mechanistic study by decreased T3, decreased T4 and increased TSH indicative of a perturbation of the hypothalamic–pituitary–thyroid (HPT) axis in rats.

We note the applicant's claim that in vitro assays using human liver cells have been developed to exclude the relevance of the observed effects for humans. However, this study neither is part of the regulatory data requirements, nor it's included in established European and OECD guidance documents. Using it to override the evidence of thyroid adversity observed in multiple established animal studies conducted according to validated protocols is completely unacceptable. Given the potential impact of thyroid disruption on healthy pregnancies, authorising this substance would risk violating EU law, which requires a high level of protection of human health and places particular emphasis on safeguarding vulnerable groups.

In line with Regulation (EC) No 1107/2009, we call on you to **support the non-approval of cinmethylin.**

**Penoxsulam:** As highlighted by EFSA in its [conclusions](#), penoxsulam meets the OECD definition of a PFAS and exhibits moderate to high persistence in the environment. Its molecular structure contains a trifluoromethyl (–CF<sub>3</sub>) group, a moiety well recognised as a precursor of TFA through degradation. The formation of TFA from –CF<sub>3</sub>-containing substances is a foreseeable and scientifically established transformation route. Although the renewal dossier for penoxsulam did not report TFA formation in plant residue, rotational crop, dietary or soil metabolism studies, the absence of detection cannot be interpreted as evidence that TFA is not formed. Standard degradation studies, such as OECD 307, are limited to 120 days and may be insufficient to detect late-forming degradation products such as TFA, particularly where the parent compound or intermediate metabolites are persistent. In soil metabolism studies, penoxsulam was shown to degrade into several PFAS metabolites that retain the –CF<sub>3</sub> group and could therefore be transformed into TFA. Moreover, significant unidentified fractions were observed in certain soil studies, which may include TFA. Consequently, the available data do not

exclude TFA formation from the use of penoxsulam, which should have been highlighted by EFSA. Additional methodological limitations further undermine the reliability of the degradation assessment. As previously mentioned, PFAS pesticides that emit TFA into the environment should not be approved, given their potential to contaminate groundwater and TFA's toxicity to reproduction, with a category 1B classification currently under consideration by ECHA.

In light of its classification as a PFAS, and its potential to contribute to TFA emissions, we call on you to **support the non-renewal of penoxsulam**. We also oppose any renewal of the substance for use on rice.

**Halosulfuron-methyl:** Halosulfuron-methyl has been classified as toxic for reproduction, category 1B, since 2017. Under Annex II, point 3.6.4 of Regulation (EC) No 1107/2009, active substances with this classification shall not be approved, except under very limited conditions: either if human exposure is negligible, or, under Article 4(7), if a derogation is justified by a serious plant health threat that cannot be controlled by other means, including non-chemical alternatives. Despite these clear legal requirements, the approval of halosulfuron-methyl, initially valid from 1 October 2013 to 30 September 2023, has been repeatedly prolonged.

In the present case, the applicant requested a derogation under Article 4(7) for uses on rice and maize in five Member States during the [EFSA peer review](#). However, EFSA [concluded](#) that a broad range of non-chemical alternatives is available and that, in many cases, integrated strategies combining chemical and non-chemical methods are feasible. This clearly demonstrates that the conditions for granting a derogation are not fulfilled. Furthermore, the toxicological reference values established for halosulfuron-methyl (ADI, ARfD, AOEL and AAOEL) cannot be considered reliable, as the assessment of endocrine-disrupting properties remains inconclusive. It is deeply concerning that a substance meeting the cut-off criteria for reproductive toxicity has remained on the market for years, despite clear evidence since 2017 that the legal conditions for approval were no longer met.

In line with Regulation (EC) No 1107/2009, we call on you to **support the non-renewal of halosulfuron-methyl**.

**Phenmedipham** meets the endocrine disruption (ED) criteria for non-target organisms, as laid down in point 3.8.2 of Annex II to Regulation (EC) No 1107/2009, according to EFSA's [conclusions](#). This constitutes a critical area of concern and provides a clear basis for the substance's non-renewal.

In line with Regulation (EC) No 1107/2009, we call on you to **support the non-renewal of phenmedipham** .

**Phosphine:** EFSA's [peer-review conclusions](#) on phosphine raise serious concerns that preclude the renewal of the substance, particularly in light of clear evidence for its clastogenicity. This conclusion is supported by *in vitro* studies, *in vivo* studies in somatic cells, and human biomonitoring data. No threshold-based mode of action has been identified, and as a result, no toxicological reference values could be established. EFSA has therefore recognised the genotoxic potential of phosphine as a critical area of concern. Given this evidence, phosphine cannot be considered to meet the approval criteria for renewal under Regulation (EC) No 1107/2009.

In line with the Pesticide Regulation, we call on you to urgently **support the non-renewal of phosphine**.

**Diflufenican** meets the OECD definition of a PFAS and degrades into TFA. Evidence from a Danish [study](#) conducted by the Geological Survey of Denmark and Greenland (GEUS) demonstrates that, under real-use conditions, diflufenican degrades to TFA in soils, resulting in contamination of groundwater. In one representative use scenario on winter grains, TFA concentrations were measured at 0.12 µg/L, exceeding the EU legal limit of 0.1 µg/L. Moreover, a [study](#) by Diehle *et al.*, published on 13 October 2025, identified diflufenican as one of the substances with the highest TFA leaching potential in the EU, particularly for use on cereals (spring and winter).

Although the renewal dossier for diflufenican did not report TFA formation, the data mentioned above indicate that TFA formation and leaching into groundwater is an inevitable outcome of diflufenican use. This constitutes a clear critical area of concern, which should prevent the substance's renewal. [EFSA's peer review conclusions](#) failed to address this critical issue, an oversight that we strongly deplore given the clear evidence of TFA formation and its implications for groundwater contamination. EFSA, however, identified a critical area of concern for aquatic toxicity. Taken together, these findings demonstrate that diflufenican poses unacceptable risks to both groundwater and aquatic ecosystems.

In line with Regulation (EC) No 1107/2009, and building on EFSA's conclusions, we call on you to **support the non-renewal of diflufenican**.

## 10. Draft renewal reports: cyprodinil, fludioxonil, and fenoxaprop-P-ethyl (A.05)

As highlighted in our previous letters to SCoPAFF, recent conclusions by EFSA have confirmed that several substances currently under renewal, clearly meet the criteria for endocrine disruption, and as such, no longer fulfil the conditions for reapproval under the Pesticide Regulation. We regret to see that the Commission is presenting a non-renewal for buprofezin only, while the substances concerned - [cyprodinil](#), [fenoxaprop-P-ethyl](#) and [fludioxonil](#) - are still under point A, even though it has been identified that they may cause harmful effects on human health -particularly vulnerable groups- and the environment. Meanwhile, other substances are being processed much more quickly.

Article 4 and points 3.6.5 and 3.8.2 of Annex II of the Pesticide Regulation clearly provide that active substances having endocrine-disrupting properties cannot be approved unless exposure is negligible. EFSA's findings show that this 'negligible exposure' condition was not demonstrated for these substances. Moreover, **as the legal requirements under Article 4(7) for exceptional approval were not satisfied in time by applicants, renewal under this derogation is not permissible for any of these four substances.**

In our [letter](#) of 23 June 2025, we expressed our deep concern to the Commission regarding the PAFF committee's repeated failure to take decisive action to ban these harmful substances. These repeated delays in decision-making are unacceptable and contribute to further setbacks in what has already been a prolonged evaluation process for all four substances. In particular, the latest delay has led to a proposal by the Commission to extend the approval period for buprofezin, which we strongly urge you to oppose (Agenda item B.06).

We therefore call on you to take a clear and firm stance in favour of the **non-renewal of all endocrine-disrupting active substances.**

## 11. Article 21: flupyradifurone (A.11)

PAN Europe, together with Générations Futures, has formally [written](#) to the European Commission to raise serious concerns regarding the prolonged handling of the Article 21 review of flupyradifurone.

In our letter, we question the Commission's management of the procedure over the past four years and request clarification on whether a mandate has been, or will be, sent to EFSA under Article 21 of Regulation (EC) No 1107/2009 to assess the new data on pollinators. We specifically ask whether such a mandate will include:

- a specific risk assessment for solitary bees, as recommended by EFSA in its 2022 statement; and

- a re-assessment of higher-tier honey bee studies in line with the principles set out in EFSA (2013).

We also urge the Commission to forward to EFSA the extensive body of peer-reviewed literature identified by Générations Futures (72 studies, including 44 on bees and bumblebees), which has not yet been evaluated, and to include these data in the ongoing Article 21 review. Furthermore, we highlight the applicant's failure to comply with Article 56 of Regulation (EC) No 1107/2009 by not submitting relevant studies, and we call on the Commission to ensure proper enforcement of Articles 44(3)(e) and 56 of the Regulation. Given the accumulating scientific evidence of harm to pollinators, and considering the neonicotinoid-like mode of action of flupyradifurone, we stress that it is highly unlikely that the substance meets the approval criteria laid down in Article 4 of Regulation (EC) No 1107/2009. We therefore urge the Commission to accelerate the Article 21 review procedure and not wait until the extended approval deadline of June 2029 to take appropriate regulatory action.

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Thank you in advance for your consideration of these matters.

Sincerely yours,

On behalf of PAN Europe  
Angeliki Lysimachou  
Head of Science and Policy

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