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Department of Defence

No. 2026/4850

Brussels, 4 June 2026

Subject: Ensuring a robust and sustainable approach to pesticide/biocide approvals under the "Food & Feed Safety" Omnibus X package

Dear colleagues,

In light of the latest developments in the ongoing discussions led by the Cypriot Presidency, notably the compromise proposals that have been tabled, on the Commission's "Food & Feed Safety" Omnibus proposal, we would like to share a number of considerations regarding the proposed shift towards granting, for most active substances, approvals without a defined time limitation.

We fully support the objective of improving the efficiency, clarity and predictability of the EU regulatory framework. Simplification and a lighter administrative burden are legitimate goals, which are essential to support innovation, competitiveness and the effective functioning of both our agricultural systems and the biocides sector.

While the Commission's initial proposal to move towards unlimited approvals raised significant concerns, we support the compromise proposals put forward by the Cypriot Presidency constituting a substantial and constructive evolution.

The considerations below reflect, in this respect, the key issues raised by the initial proposal from a public health and environmental protection perspective.

First, from an environmental and public health perspective, the removal of periodic review as a structural feature of the system may weaken our collective capacity to ensure that regulatory decisions continuously reflect the latest available scientific knowledge. In fields characterised by evolving evidence, cumulative effects and long-term environmental exposure – including impacts on water resources, biodiversity and ecosystems, as well as potential long-term effects on human health, including for vulnerable groups and through chronic or combined exposure – the ability to reassess substances at regular intervals remains a key safeguard.

Second, it remains unclear at this stage how a purely risk-triggered or targeted review system would be governed and implemented in practice. Questions remain regarding the criteria for initiating reviews, the prioritisation process, the availability of scientific capacity, and the ability to react in a timely and systematic manner to emerging evidence. In the absence of sufficiently detailed and substantiated elements, it is difficult to assess whether such a system would provide an equivalent level of protection.

In addition, it is not clear how this new model would effectively free up resources. It could instead increase the continuous monitoring burden on authorities, shift the burden of proof entirely onto competent authorities, and weaken the “polluter pays” principle. Finally, by replacing predictable renewal cycles with potentially ad hoc reassessments, it may reduce predictability both for competent authorities and for industry.

Third, recent exchanges with the European Food Safety Authority (EFSA) suggest that the current backlog in renewal assessments may primarily result from capacity and resource constraints, as well as from the quality and completeness of submitted dossiers, rather than from the underlying structure of the approval regime itself. In this respect, the possibility of strengthening scientific capacities and improving dossier quality appears to offer a credible and proportionate pathway to address existing challenges, while preserving a high level of protection.

In light of these elements, we believe that any structural evolution of the system should be based on a comprehensive and transparent assessment of its potential impacts on both human health and the environment, and should carefully consider alternative solutions that address the root causes of current delays.

In this context, we would like to underline that we can support the compromise proposals put forward by the Cypriot Presidency which provide a more balanced approach, capable of reconciling simplification objectives with the preservation of essential safeguards.

We support an approach that:

- preserves a robust and science-based framework ensuring a high level of protection;
- improves the efficiency of procedures through targeted investments in scientific capacity and tools;
- reinforces the quality and completeness of submitted data, while ensuring that the regulatory framework enables competent authorities to more readily reject dossiers that are incomplete or where the required data are not provided within the applicable deadlines;
- and ensures that any simplification does not result in a structural weakening of essential safeguards.

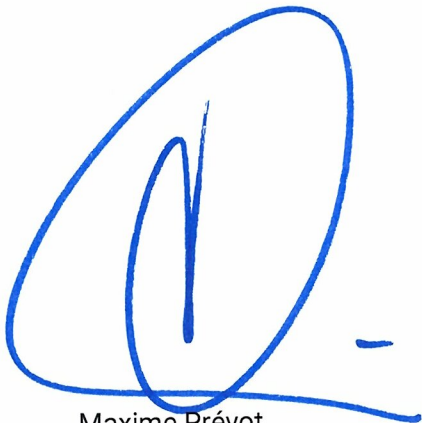
We trust that these improvements will be supported by all Member States within the Council and can form a solid and unified basis for the next stages of the legislative process.

Looking ahead to the forthcoming trilogue negotiations, it will be essential to preserve this balance and to maintain the key safeguards and improvements reflected in the current compromise.

We also look forward to working closely with the incoming Irish Presidency to ensure continuity in this regard.

We remain committed to working closely with you to achieve a framework that is both efficient, credible and fully aligned with our environmental and public health objectives.

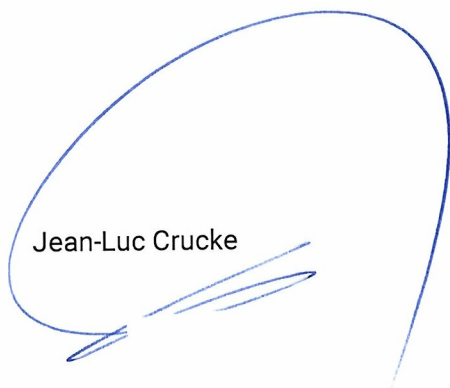
Yours sincerely,

A stylized handwritten signature in blue ink, consisting of a large loop followed by a vertical stroke and a horizontal dash.

Maxime Prévot

A handwritten signature in blue ink, featuring a large initial 'F' followed by a cursive script.

Frank Vandembroucke

A handwritten signature in blue ink, featuring a large loop followed by a horizontal stroke and a vertical dash.

Jean-Luc Crucke