

Strasbourg, 13/11/2025

Decision concerning complaint 2894/2025/KR against the European Commission

Dear

You recently submitted a complaint to the European Ombudsman against the European Commission about its methodology to measure the use of plant-protection products ('pesticides') and risks related to that use: the Harmonised Risk Indicator 1 (HRI 1).

The complaint is that by using and promoting HRI 1, the Commission breached its duty of accuracy and transparency.

After careful analysis of all the information submitted to her Office, the Ombudsman regrets to inform you that there are insufficient grounds to open an inquiry into your complaint.¹

In your complaint, you indicated that you would like the Commission to correct the HRI 1 methodology and retract previous statements on the decrease of pesticide use and risk. You referred to various interactions with the Commission to discuss your concerns, including your letter of 28 January 2025 to the Commission, the Commission's reply of 31 March 2025, as well as three meetings with representatives of the Commission in April 2025.

In its written reply to you, the Commission said that the HRI 1 was adopted by most EU Member States and that its underlying methodology is published alongside the indicator values to ensure transparency. The Commission also said that the design of the indicator is limited due to a lack of relevant data. The Commission added that harmonised data on pesticide use should become available as of 2028², and that these new data should provide a basis for further improvement of the HRI 1 or for the development of new risk indicators. The Commission said that efforts to improve harmonised risk indicators are ongoing and that its Joint Research Centre (JRC) is assisting this work.

¹ Full information on the procedure and rights pertaining to complaints can be found at <https://www.ombudsman.europa.eu/en/document/70707>.

² In accordance with Regulation (EU) 2022/2379 of 23 November 2022 on statistics on agricultural input and output, OJ L 315, 7.12.2022, pp. 1–29 (SAIO), see: <https://eur-lex.europa.eu/eli/reg/2022/2379/oj/eng>.



The Ombudsman notes that, on 27 May 2025, the JRC made public a study in which it explores a new risk indicator to better assess potential exposure to pesticides.³ On 14 October 2025, the JRC published another study on 'Emerging alternatives to the use of conventional pesticides'.⁴ Both publications seem to confirm the Commission's ongoing commitment to improving the tools to measure the use and risks of pesticides.

Based on the documentation submitted with your complaint, it appears that the Commission replied to your concerns on different occasions, by answering your letters and through several meetings with your organisation, and that it provided sufficient reasons for its position. It also seems that information on its work to improve the harmonised risk indicators and/or to develop new ones is publicly available.

In view of the above, the Ombudsman considers that there are insufficient grounds to open an inquiry into your complaint at this stage. She therefore closed the case.

The Ombudsman appreciates that this may not be your desired outcome, but hopes that you find these explanations useful.

Yours sincerely,

³ See: https://joint-research-centre.ec.europa.eu/jrc-news-and-updates/jrc-explores-new-risk-indicator-better-assess-potential-exposure-pesticides-2025-05-27_en.

⁴ See: <https://publications.jrc.ec.europa.eu/repository/handle/JRC144048>.