



Dr. Maria Panayiotou
Minister of Agriculture, Rural Development, and Environment of the Republic of Cyprus

Dr. Andrea Grigoriou
General Director of the Ministry Agriculture, Rural Development, and Environment of the Republic of Cyprus

Subject: Follow-up on the Nicosia conference and Concerns Regarding the Pesticide Omnibus Proposal

Dear Minister of Agriculture, Rural Development, and Environment,
Dear General Director,

We would like to once again express our sincere appreciation for your valuable contribution to the recent PAN Europe conference on pesticides, held in cooperation with the Cyprus International Institute for Environmental and Public Health (CII) at the Cyprus University of Technology in Nicosia. Your input greatly enriched the discussions and contributed to the overall success of the event.

Following our [previous joint letter with Cypriot NGOs](#) and scientists, we would like to expand on our serious concerns regarding the European Commission's recent Omnibus proposal on Food and Feed Safety Simplification. **Simplifying EU legislation can be appropriate** only if it reduces administrative burdens without lowering protection standards. The Omnibus, however, proposes **substantial changes that significantly weaken** the current pesticide approval system under the EU Pesticide Regulation (1107/2009) and compromise its fundamental objective to ensure a high level of protection from pesticides.

An independent legal opinion (see Annex I) found that the proposal **violates EU primary law both in substance and procedure**. It is considered incompatible with the precautionary principle under Article 191(2) TFEU and fails to meet the Union's positive obligations under the Charter of Fundamental Rights as applied to Regulation 1107/2009.

Most concerningly, the proposal would make **unlimited approval periods for active substances the norm**, while limited approvals would become the exception. Recent [analysis](#) shows that 49 synthetic pesticides, including widely used chemicals such as glyphosate, acetamiprid, and PFAS pesticides, would automatically receive unlimited approval if the Commission's proposal enters into force on 1 January 2027 (see Annex I). **This number will increase with the renewal of the substances that are currently under risk assessment.**

The Commission's evaluation from 2020 concluded that Regulation 1107/2009 is effective in providing a high level of protection, because of its strict criteria and periodic reviews of pesticide substances and products. Since 2011, the renewal process has led to the non-approval of 31 active substances that were not initially considered among the most hazardous, including chlorpyrifos, a brain-harming and reprotoxic pesticide (see Annex II). Periodic reassessment ensures that companies retain responsibility for continuously demonstrating safety, consistent with the polluter-pays principle. Without it, the burden is shifted to public authorities and researchers, effectively **transferring costs from industry to taxpayers**.

This shift to unlimited approvals is combined with other concerning measures. These would restrict Member States' ability to rely on the latest scientific evidence in product authorisation decisions, extend 'grace' periods for substances after their ban despite knowing they are highly toxic, and expand derogation approvals for substances that do not meet safety criteria (e.g. endocrine disruptors). Taken together, **hazardous substances will remain in the market**. These are not mere simplifications but **substantial modifications requiring comprehensive impact assessments in accordance with democratic decision-making processes** (see Annex III), which has not been the case.

Given the ongoing biodiversity crisis, widespread water contamination, and the documented impacts of pesticides on human health and ecosystems, [scientists](#) have made clear that this is not the moment to weaken existing safeguards. On the contrary, implementation and enforcement of current legislation should be strengthened.

Moreover, the EU has explicitly committed under the 'Vision for Agriculture and Food' to strengthen agri-food sector resilience, protect and restore biodiversity, reduce emissions, and safeguard natural resources. Given this commitment, the EU needs to prioritise investment in sustainable alternatives, including organic farming, and reduce reliance on synthetic pesticides. Such action is urgent to secure our long-term food system resilience.

In this regard, we respectfully urge the Cyprus Presidency to **firmly oppose any elements of the Omnibus proposal** that weaken the protection of human health, the environment, and farmers from toxic pesticides, while ensuring transparent Council discussions and guaranteeing full consideration of scientific and civil society.

For your reference, we have attached the following annexes:

- **Annex I:** Independent legal opinion on the Omnibus proposal.
- **Annex II:** List of active substances banned as a result of their periodic reassessment since 2011
- **Annex III:** PAN Europe's position paper on Food and Feed Omnibus proposal



We remain available for further discussion and would welcome the opportunity to provide additional technical analysis should it be useful.

Thank you for your consideration.

8 April 2026

Sincerely yours,

A handwritten signature in black ink, appearing to read "K. Makris", written over a light grey rectangular background.

Prof. Konstantinos C. Makris
Cyprus International Institute for Environmental and Public Health
Cyprus University of Technology

A handwritten signature in black ink, appearing to read "A. Lysimachou", written over a light grey rectangular background.

Dr. Angeliki Lysimachou
Head of Science and Policy
Pesticide Action Network Europe