

Subject: Common Agricultural Policy post-2027

Dear Ministers of Health, Environment and Agriculture,

We are reaching out to you in view of the ongoing negotiations on the Common Agricultural Policy (CAP) post-2027. **It is a pivotal moment to redirect the CAP to truly resilient, sustainable, efficient and future-proof farming systems, which phase out harmful pesticides¹.** We elaborate below why this is essential, as well as remind of **key recommendations** in view of current negotiations.

- **Use of pesticides imposes immense costs on society, due to their harm to the environment, biodiversity², ecosystem functions and human health.** They also drift far beyond where they are applied, and therefore the land polluted and degraded is much larger than the production area. Cocktails of hazardous pesticides are widespread in soils, water, vegetation, air, houses and schools³. Conservative assessments estimate that **phasing out harmful pesticides is at least 30x cheaper than continuing business as usual, due to the extremely high costs society pays, caused by harm to human and ecosystem health⁴.**
- **Pesticide use severely harms ecosystem health, which is the foundation of food production:** it undermines **soil life**, beneficial **insects** and other fauna **controlling pests, pollinators**, as well as **water quality and availability**. Indeed, living soils contain more humus enabling water retention. Use of harmful pesticides has also fueled an inefficient, **never-ending cycle of pest resistance**.
- **Scientists underline that systems dependent on heavy and harmful pesticide use have long exceeded their limits, that they are unsustainable and inefficient, and that a paradigm-shift**

¹ CAP post 2027 - an opportunity to answer citizens' demands and support farming beyond pesticides

² Hallmann et al. (2017). More than 75 percent decline over 27 years in total flying insect biomass in protected areas, Rigal et al. (2023). Farmland practices are driving bird population decline across Europe, Beaumelle et al. (2023). Pesticide effects on soil fauna communities - A meta-analysis, Gunstone et al. (2021). Pesticides and Soil Invertebrates: A Hazard Assessment, Seibold et al. (2019). Arthropod decline in grasslands and forests is associated with landscape-level drivers, Brühl et al. (2024). Widespread contamination of soils and vegetation with current use pesticide residues along altitudinal gradients in a European Alpine valley, EEA (2023). How pesticides impact human health and ecosystems in Europe, Brühl et al. (2021). Direct pesticide exposure of insects in nature conservation areas in Germany, Honert, Mauser, Jäger, & Brühl (2025). Exposure of insects to current use pesticide residues in soil and vegetation along spatial and temporal distribution in agricultural sites, Mauser et al. (2025). Current-use pesticides in vegetation, topsoil and water reveal contaminated landscapes of the Upper Rhine Valley, Germany

³ Silva et al. (2019). Pesticide residues in European agricultural soils – A hidden reality unfolded, Silva et al. (2023). Pesticide residues with hazard classifications relevant to non-target species including humans are omnipresent in the environment and farmer residences, Pesticides in our bedrooms. SOS Slaapkamer: Gemiddeld 21 pesticiden in elke slaapkamer, Deziel et al. (2017). Relative Contributions of Agricultural Drift, Para-Occupational, and Residential Use Exposure Pathways to House Dust Pesticide Concentrations: Meta-Regression of Published Data, Determinants of Agricultural Pesticide Concentrations in Carpet Dust, Gunier et al. (2011). Determinants of Agricultural Pesticide Concentrations in Carpet Dust, Figueredo et al. (2022). Pesticides in doormat and floor dust from homes close to treated fields: Spatio-temporal variance and determinants of occurrence and concentrations

⁴ Systemiq (2025). Invisible Ingredients: Tackling toxic chemicals in the food system, BASIC. (2021). Pesticides: a model that's costing us dearly: An initial cost-benefit analysis of the pesticide sector at the European level, Alliot et al. (2022). The social costs of pesticide use in France

is urgent: systemic transition to approaches based on active pest prevention and ecologically sound control measures⁵.

- A vast amount of scientific evidence shows the **links between exposure to pesticides and increased risks for a variety of serious illnesses**⁶. Farmers and their families are particularly vulnerable, leading to an increased probability of developing developmental disorders, paediatric and adult cancers, as well as neurodegenerative diseases such as Parkinson's disease⁷. Farmers and other citizens living in agricultural areas provide heart-wrenching testimonials on how they, or their families, are affected⁸. Children, their organs and neurological, endocrine and cardiovascular systems still developing, are particularly vulnerable to the harmful effects of pesticides⁹.
- Farmers throughout Europe implementing IPM, agroecological, organic and other approaches, putting pest prevention at the core, testify that **phasing out harmful pesticides, investing in soil health, natural pest control and diversified cropping systems, is possible, efficient, and increases resilience to both pests and extreme weather events** in the face of the climate crisis. This is also substantiated by a strong body of scientific evidence and research projects, which show that massive reduction or phase out of pesticides is possible while maintaining good yields and profits¹⁰. For example, the French National Agronomic and Environment Research Institute (INRAE) found, during a 10-year study, that agroecologically managed pesticide-free cropping systems can, under the right conditions, match or even surpass conventional yields¹¹. Moreover, it is essential to take all costs linked to damage to ecosystems and human health into account, which undermine society, and all benefits of restoring healthy environments.

⁵ Riedel (2025). SPRINT - Final report and policy recommendations, SPRINT - Policy Briefs, Vezien et al. (2025). AGROWISE - Recommendations for the European Commission, Member States, supply chain, advisors and trainers, and farmers

⁶ Inserm (2021). Collective Expert Review on the Health Effects of Pesticides, EEA, 2023: How pesticides impact human health and ecosystems in Europe, Silva et al. (2023). Pesticide residues with hazard classifications relevant to non-target species including humans are omnipresent in the environment and farmer residences, Alaoui (2024). Identifying pesticides of high concern for ecosystem, plant, animal, and human health: A comprehensive field study across Europe and Argentina, Panzachi et al. (2025). Carcinogenic effects of long-term exposure from prenatal life to glyphosate and glyphosate-based herbicides in Sprague-Dawley rats, Bloem and Boonstra, (2023). The inadequacy of current pesticide regulations for protecting brain health: the case of glyphosate and Parkinson's disease, Matsuzaki et al. (2023). Pesticide exposure and the microbiota-out-brain axis, Diwan et al. (2023). Impact of Pesticide Residues on the Gut-Microbiota-Blood-Brain Barrier Axis: A Narrative Review, Gama et al. (2022). Chronic Effects of Dietary Pesticides on the Gut Microbiome and Neurodevelopment, Santé publique France, 2025: Cancers - Données de l'incidence Nationale 1990-2023 and Mediapart, 2025: Le cancer progresse chez les plus jeunes, le rôle des pesticides est avéré

⁷ Kab et al. (2017). Agricultural activities and the incidence of Parkinson's disease in the general French population, Doğanlar et al. (2018). Nonoccupational Exposure of Agricultural Area Residents to Pesticides: Pesticide Accumulation and Evaluation of Genotoxicity, Figueiredo et al. (2019). Spatio-temporal variation of outdoor and indoor pesticide air concentrations in homes near agricultural fields, Santé publique France, 2025: Cancers - Données de l'incidence Nationale 1990-2023

⁸ Testimonies of from families affected by pesticide exposure, Parlement Européen: Protégeons nos enfants des pesticides, évitons les drames à venir

⁹ Taiba et al. (2025). Exploring the Joint Association Between Agrichemical Mixtures and Pediatric Cancer, Parrón-Carrillo et al. (2024). Environmental Exposure to Pesticides and the Risk of Child Neurodevelopmental Disorders, PAN Europe (2023). Science calls for protection of children's health from long-term impacts of pesticides, Bretveld et al. (2006). Pesticide exposure: the hormonal function of the female reproductive system disrupted?, Farr et al. (2004). Pesticide use and menstrual cycle characteristics among premenopausal women in the Agricultural Health Study

¹⁰ United Nations (2017). Report of the Special Rapporteur on the right to food - UN experts denounce 'myth' pesticides are necessary to feed the world, IPMWORKS project. Reducing pesticide use is a must for the future, Lechenet et al. (2017). Reducing pesticide use while preserving crop productivity and profitability on arable farms, Pecenska et al. (2021). IPM reduces insecticide applications by 95% while maintaining or enhancing crop yields through wild pollinator conservation, INRAE (2022). Protect crops by increasing plant diversity in agricultural areas, Magrath et al. (2022). Increasing crop richness and reducing field sizes provide higher yields to pollinator-dependent crops, Rodriguez et al. (2022). Aphid suppression by natural enemies in hedgerows surrounding greenhouses in southern Spain, Nandillon (2024). Pesticide use reduction: evolution of practices and technico-economic performances within farms of the DEPHY network, EARA (2025). Farmer-led Research on Europe's Full Productivity The Realities of Producing More and Better with Less, Nandillon et al. (2024). Crop management strategy redesign enables a reduction in reliance on pesticides: A diachronic approach based on a diversity of French commercial farms, Wäckers. From Pesticide Addiction to Ecological Integrated Pest Management

¹¹ Ortiz-Vallejo et al. (2026). Pesticide-free agriculture: is a third way possible besides organic and conventional agriculture?

- In 2009, EU co-legislators committed to implement alternatives to pesticides and move towards a low-pesticide agriculture in the EU, in the framework of the Directive on the **Sustainable Use of Pesticides (dir. 2009/128/EC, hereafter 'the SUD')**¹². This directive makes Integrated Pest Management (IPM) mandatory, and obliges to protect citizens', Natura2000 areas, surface water and groundwater against pesticides. The directive is very poorly or not implemented by Member States, leaving citizens, nature and water heavily exposed to cocktails of hazardous pesticides.

It is therefore essential that the CAP financially and technically supports farmers in the phase out of harmful pesticides. Spending taxpayer's money on destructive practices, eradicates the social acceptability of the CAP. In addition, pesticides and other inputs represent a significant cost to farmers: CAP public funds should support farmers' livelihoods, not the pesticide industry.

Below, we underline key priorities and areas of concern, and also refer back to our earlier shared proposals.

- **Ring-fence budget for environmental and climate actions**

The CAP budget must be used integrally to fund the transition to truly sustainable, resilient farming systems. Ring-fencing the budget, including for **organic farming**, to serve these primary objectives is therefore key. At the very least, 35% of the CAP budget should be ringfenced for agri-environment-climate actions, to avoid backsliding. The integral CAP budget should be linked to sustainable systems, which phase out harmful inputs and provide public goods.

- **Reduction and phase out of harmful pesticides should be a key objective, priority area and action in article 3, 4 and 10**

It is essential that the reduction and **phase out of the use of harmful pesticides is specifically included as an objective of protective practices** (Art.3 and Annex I), as **a separate objective in the environmental and climate priority areas** (Art. 4) and as **an agri-environmental and climate action** (Art. 10). The focus should be on 'reduction' and 'phase out' of harmful pesticides, instead of on the 'sustainable use of pesticides', which does not have a legal definition, which would render this provision inoperative. It is well established by science that current pesticide use is destructive for biodiversity and harming human health, and that reduction and phase out of the use of harmful pesticides is key. There should be a clear obligation to ensure adequate ring-fenced support to **organic farming** (including in Article 10). Organic farming is today the only legally certified standard for sustainable agroecological practices. Support for the further development of organic agriculture is key in phasing out harmful pesticides in Europe, and providing EU citizens with food of which the quality and production is bound to legally defined agroecological standards. Articles 3, 4, 10 and Annex I should also include clear references to agronomic and landscape measures that enable to protect and restore soil health, water quality and biodiversity (protection and restoration of

¹² [Sustainable Use of Pesticides Directive 2009/128/EC](#), [Implementation assessment on SUD by the European Parliamentary Research Service \(2018\)](#), [Report on the SUD of the European Commission \(2020\)](#), [Report on the SUD of the European Court of Auditors \(2020\)](#)

high-diversity landscape features, protection and restoration of permanent grasslands, **long** crop rotation **and** diversification, permanent soil cover, ...) (See suggested Amendments).

- **Protection and restoration of water quality, quantity and soil health, key public goods, should be key objectives and priority areas**

It is highly worrying that the draft compromise text of the Presidency drastically weakens the priority area dedicated to water (article 3 and 4). Groundwater is removed from the list of objectives of the protective practices (Art.3), and the protection of water quality and sustainable use of water resources is removed as a separate priority area (Art.4). Protection of groundwater, surface water and drinking water should evidently be key priority areas. Water availability and quality is under high threat, with far-reaching degradation of water resources across Europe due to chemical pollution. Pesticides are one of the main causes of water pollution: prevention at source is key¹³. Furthermore, recurrent droughts and floodings linked to climate change increases pressure on water quality. Specifically, also the pollution of groundwater poses great risks and challenges: once polluted, it is very difficult to restore groundwater quality. Persistent, mobile and/or toxic pesticide residues pollute (drinking) water across Europe, with many residues, such as the reprotoxic PFAS metabolite Trifluoroacetic acid (TFA)¹⁴ and 1,2,4-triazole, practically impossible to remove, and many pesticides and metabolites are not even monitored. These situations are incomprehensible, as it is up to 45 times cheaper to financially support farmers for not using pesticides and organic farming, compared to the sole cost of water treatment to reduce pollutants¹⁵. **Water is an essential public good. It is essential that the protection of water and groundwater against pollution is a key separate objective in article 3 and priority area in article 4, including a specific mention of the protection of water (surface water, groundwater, drinking water) against pesticides.**

- **Protection of permanent grasslands is essential**

Permanent grasslands are of immense importance for biodiversity, habitat protection, water storage and buffering, and landscape preservation. It is highly worrying that the Council's draft text removes, instead of strengthens key protection safeguards. The exact aim of the CAP should be to protect and restore, and not degrade, high-value land uses as permanent grasslands which are of essential societal value and provide a wide range of public goods.

- **Transition payments should be result-based, linked to transition plans, with adequate, ring-fenced funding**

Adequate funding for transition payments is essential, as the transition to sustainable systems requires investments at farm and landscape level, and should be the main aim of the CAP. **It is pivotal that any transition payments for systems where pesticides other than natural-low risk pesticides are**

¹³ [EEA 2024 - Europe's state of water 2024: the need for improved water resilience.](#)

¹⁴ [New study reveals alarming forever Chemical TFA concentrations in Europe's water. PFAS pesticides and TFA, PFAS: France's tap water is widely polluted with TFA, the most common 'forever chemical', The Global Threat from the Irreversible Accumulation of Trifluoroacetic Acid \(TFA\), Kleinste PFAS-soort die in veel Vlaams drinkwater zit, veroorzaakt mogelijk vruchtbaarheidsproblemen.](#)

¹⁵ [Grolleau and McCann \(2012\) Designing watershed programs to pay farmers for water quality services: Case studies of Munich and New York City](#)

currently still used, are linked to ambitious reduction of pesticides, based on robust, performance-based indicators on pesticide use and risk. Transition plans should involve the shift to agroecological, organic and other restorative practices, which are based on restoration and regeneration of soil health, water quality, ecosystem functioning and biodiversity. Support to farm- and landscape-level transitions should **only be granted if the transition includes the result-based ambitious reduction of pesticide use and risk**, aiming for a phase out of harmful pesticides. The plans should be motivated by **independent, high level advisory services** on IPM and agroecological and/or organic practices. The transition plans **should include the need to show reduction in pesticide use and risk**, wherever pesticides other than natural-low risk pesticides are still used. Reduction in pesticide use and risk should be **assessed using a science-based, robust indicator**.

- **The use of harmful pesticides should be ineligible for investments and other payments**

The list of practices ineligible for direct payments and/or investments should include **systems which use pesticides beyond low-risk pesticides and are not in a transition to ambitiously reduce/phase out harmful pesticides, in line with the SUD**. Practices which continue use of particularly harmful pesticides, such as Candidates for Substitution, PFAS-pesticides, banned pesticides and other particularly harmful pesticides (CMR, endocrine disruptors, neurotoxics, PMT, PBT, vPvM, vPvB) should not be eligible for investments, also not during a transition period.

- **CAP funding should be fully linked to implementation of relevant pesticide legislation**

It is essential that the CAP is fully linked to the full implementation of the Pesticide Regulation (EC) No 1107/2009, Directive 2009/128/EC on the Sustainable Use of Pesticides (SUD) and Implementing regulation (EU) 2023/564 on the digital record-keeping of pesticide use. Currently, key aspects of these legislations have not been taken up in the SMRs, while meeting the obligations of these legislations should evidently be a clear basis (See suggested Amendments).

- **Advisory services should be independent and provide high-level expertise on phase out pesticide use**

All farmers should be advised and guided by independent advisory systems, which provide **high-expertise advice on IPM and crop-specific IPM guidelines, soil health restoration, phase out of the use of harmful pesticides, agroecological, organic and agroforestry practices, tailored to farm types and different production systems, including whole-farm, partial-farm and landscape-level transition planning**. Although high expertise advice is also a mandatory provision from the SUD (article 14), this is poorly implemented in most Member States.

Thank you very much for your valuable time and consideration, regarding this pivotal topic.

We remain at your disposal for more information. Sincerely,

Kristine De Schampheleere, Policy Officer, PAN Europe, kristine@pan-europe.info, 0032 473 96 11 20