



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Health and food audits and analysis
Director

Grange,
SANTE.F3 ONC/gt

Dear Mr Hertoge,

Subject: Call for a commensurate reply to the rising presence of the most hazardous pesticides in the EU

Thank you for your letter to President von der Leyen of 8 June 2022. I take note of the concerns expressed in your letter in relation to the ambitions and timetable for the adoption of the legislation replacing the Sustainable Use of Pesticides Directive.

The Nature Restoration Law and the Sustainable Use of Pesticides proposal scheduled for adoption on 22 June 2022 are key to protecting health, the environment and ecosystem services. In this context it is important to recall the 2020 opinion of the EU Group of Chief Scientific Advisers, “Towards a sustainable food system”, which stated that “the EU food system has achieved high levels of food security, food safety and a wide consumer choice, but is currently not sustainable with respect to the environmental, economic and social aspects. Continuing with ‘business as usual’ will significantly endanger natural resources, our health, the climate, and the economy”.

The report published by PAN Europe asserts that the presence of more hazardous pesticides in fruits and vegetables in the EU has increased between 2011 and 2019, while the report does not specify the actual levels found. I would like to point out that an apparent increase in the total number of findings of pesticide residues does not necessarily reflect an increase in the actual quantity of pesticide residues in food, nor an increase in overall pesticide use. A full picture can only be obtained by looking at the full data set of monitoring data including the actual levels of residues, as the European Food Safety Authority (EFSA) is doing every year in its comprehensive annual report on pesticides residues found in food products, which is based on EU Member States monitoring data in accordance with Regulation (EC) No 396/2005. EFSA’s latest report covering the year 2020 analysed more than 88 000 samples and showed that 55% of products were free of quantifiable residues altogether and 40% contained traces not exceeding the permitted maximum residue levels (MRLs). These figures have been stable over the past 10 years, showing that the control systems work well. EFSA additionally confirmed via a comprehensive consumer exposure assessment that there is no health risk for consumers of fruits and vegetables.

Mr. Koen Hertoge,
President
Pesticide Action Network (PAN) Europe,
Rue de la Pacification, 67,
B - 1000 – Brussels

I also note your concerns in relation to the need to substitute the most hazardous pesticides with safer alternatives for human health and the environment.

On 15 June 2022, the Commission [published](#) updated progress towards Farm to Fork pesticide reduction targets for the period 2011-2020. The use of more hazardous pesticides shows a decrease of 26% from the baseline period of 2015-2017, and a 9% decline compared to 2020.

As you are aware, the Commission initiated work to facilitate the conduct of comparative assessments in the context of Regulation (EC) No 1107/2009 and made your proposals in this regard available to the Member States. After the last meeting of the respective Working Group on 30 September 2021, the Commission launched an ad-hoc survey of Member States, in order to obtain an updated picture of the situation in their performance of comparative assessment and to gather proposals to amend the relevant Guidance Document. The Commission is analysing the responses to identify the most suitable way forward while fully respecting the legal obligation set out in Article 50 of Regulation (EC) No. 1107/2009.

Additionally, to support the transition toward a more sustainable agriculture, four Commission Implementing Regulations¹, currently under scrutiny of the European Parliament and the Council, intend to facilitate the approval of micro-organisms and the authorisation of products containing them, allowing EU farmers to have better access to biological alternatives to chemical pesticides and to protect their crops in a more sustainable manner.

Yours sincerely,

(e-signed)

María Pilar Aguar Fernández
Director

¹ For more information : https://ec.europa.eu/food/plants/pesticides/micro-organisms_en