





Date: 22.12.25

## Dr. Maria Panayiotou

Minister of Agriculture, Rural Development and Environment

# Mr. Neophytos Charalambides

Minister of Health

#### Your Excellencies,

The undersigned Cypriot scientists and NGOs, together with Pesticide Action Network (PAN) Europe, are writing to request your leadership on urgent pesticide-related matters that directly affect public health, the environment, drinking water resources, and the future sustainability of European agriculture.

As Cyprus prepares to assume the Presidency of the Council of the European Union in 2026, it will have a decisive role in safeguarding European citizens and ecosystems from harmful chemical exposures.

We respectfully call on the Cyprus Presidency to prioritise the following key actions:

- 1. Oppose the Commission's proposal for unlimited pesticide approvals and uphold periodical reviews and mandatory scientific re-evaluations of synthetic pesticides in light of updated scientific knowledge, as required under Regulation (EC) 1107/2009. Granting open-ended approvals for synthetic pesticides would represent a significant rollback of decades of progress in protecting human health and the environment from chemical pesticides.
- **2. Ensure an immediate EU-wide ban on PFAS pesticides** to stop the increasing contamination of water and food with trifluoroacetic acid (TFA), a persistent and toxic PFAS pesticide metabolite.

**3.** Ensure effective implementation of the Sustainable Use of Pesticides Directive (SUD) including mandatory Integrated Pest Management (IPM), protection of citizens from pesticide exposure, and adequate support for farmers to transition to low-input systems.

## 4. End export of EU-banned pesticides and unfair competition

by stopping the export of EU-banned pesticides and ensuring they are not allowed in imported food products.

The Cyprus Presidency has a unique opportunity to demonstrate strong leadership, prevent a rollback of decades of EU health and environmental protection, and help steer Europe towards a safer, healthier and truly sustainable agricultural model. We urge you to place these issues high on the agenda of the upcoming Presidency.

A **detailed justification and supporting evidence** for each of the above points is provided in the **Annex** to this letter.

We remain at your disposal for further dialogue and technical input. In addition, we wish to inform you of our plans to organise a conference in Cyprus in late February 2026, and would be honoured to welcome your participation and discuss these matters in greater depth.

Yours sincerely,

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#### ANNEX - Key demands with detailed justification and evidence

### 1. Oppose the Commission's proposal for unlimited pesticide approvals

We urge the Cyprus Presidency to <u>reject the recent European Commission draft proposal</u> that would allow pesticide approvals to be renewed indefinitely, undermining the precautionary principle and preventing scientific oversight. Under the guise of "simplification," this proposal would effectively abandon periodic scientific reassessment in light of new scientific knowledge and methods, weaken further human and environmental protection, especially for vulnerable groups such as children, and create a system in which harmful substances could remain on the market without time limits.

We ask the Cyprus Presidency to ensure that:

- Time-limited approvals for pesticides remain the legal standard under Regulation 1107/2009:
- Re-evaluation based on new scientific evidence for pesticide toxicity and health aspects remains mandatory;
- Full democratic oversight by Member States is preserved, preventing automatic renewals.

Such a fundamental weakening of pesticide regulation would run counter to EU commitments on health, the environment, and public trust, and we urge Cyprus to firmly oppose it.

# 2. Immediate EU-wide ban on PFAS pesticides to stop increasing TFA (metabolite of PFAS pesticides) contamination in water and food

In 2020, the EU committed to banning all non-essential PFAS. Yet PFAS-containing pesticides were excluded from the proposal on the incorrect assumption that they were properly regulated under the existing pesticide legislation . PAN Europe has demonstrated that this assumption was false. A 2021 analysis showed that out of the 37 PFAS pesticides approved at the time, residues of 31 of them were detected in fruits and vegetables, with the number of contaminated samples tripling between 2011 and 2021. Today, 31 PFAS pesticides remain authorised and used across Europe.

A major concern is that PFAS pesticides degrade into trifluoroacetic acid (TFA), a highly persistent, mobile and toxic pollutant that accumulates indefinitely in <u>Europe's surface and groundwater</u>. <u>PAN Europe testing</u> found TFA in 34 of 36 drinking water samples from 11 EU countries, including mineral water. <u>All the wines tested by PAN Europe</u> and members also contained TFA. A <u>new 2025 investigation</u> further revealed high levels of TFA in everyday cereal products across Europe, confirming widespread food-chain contamination.

TFA cannot be removed by current drinking-water treatment technologies. New technologies capable of removing TFA, such as reverse osmosis, are extremely costly, generate large volumes of wastewater and strip essential minerals from treated water, requiring subsequent remineralisation. Given the limited availability of water resources, many water companies risk being forced to shut down.

Germany has proposed to the European Chemical Agency to classify TFA as a Category 1B reproductive toxicant, based on animal studies indicating effects on foetal development, thyroid function and fertility. The EU Pesticide Regulation (EC) 1107/2009 sets strict rules for pesticide residues; these must not have harmful effects on human health, including that of vulnerable groups, or contaminate groundwater. Since PFAS pesticides are a major source of TFA contamination both in water and food, all PFAS pesticides should be banned in line with European law.

Therefore, we urge the Cyprus Presidency to ensure that the Council requests the Commission to:

- Immediately suspend and withdraw authorisation of all PFAS pesticides, under Article 69 of Regulation 1107/2009.
- Carry out TFA monitoring in surface waters in line with new standards under the Water Framework Directive, as well as groundwater and drinking water ensuring long-term water-resource protection.
- Support farmers in transitioning away from PFAS pesticides towards chemical-free and low-hazard plant protection.

# 3. Effective implementation of the Sustainable Use of Pesticides Directive (SUD)

The Sustainable Use of Pesticides Directive (2009/128/EC) requires Member States to reduce their pesticide dependence and ensure that Integrated Pest Management (IPM) is applied. Although IPM has been mandatory since 2014, implementation across Member States remains insufficient, and pesticide use has not decreased.

We urge the Cyprus Presidency to:

- Ensure full implementation of the SUD and effective enforcement of IPM.
- Protect exposure of citizens, particularly children, by banning pesticide use in public spaces and promoting minimum buffer zones free of pesticides next to homes and protected areas.
- Ensure Member States provide independent advisory services, that provide non-chemical solutions to pest management, as required under the SUD.
- Advocate for CAP or additional EU funding to support farmers in shifting to low-input and sustainable agricultural practices.

Scientific evidence shows that pesticide use can be reduced by 50–80% without yield losses when IPM is properly applied.

#### 4. Prevent unfair competition and end double standards

EU farmers must adhere to strict rules: many hazardous pesticides are banned, and rightly so. Yet once prohibited within the EU, European companies continue to export them to third countries with weaker protection laws. The impacts on local communities and the ecosystems are devastating. As a boomerang these same pesticides reappear on European consumers plates as residues in imported food, exposing European citizens while placing European farmers at an unfair competition.

<u>In 2024</u>, Europe exported 122,000 tonnes of EU-banned pesticides- mainly to low and medium income countries, a 50 percent increase compared to the 81,000 tonnes notified in 2018. <u>While in 2022</u>, a total of 53 different EU-banned pesticides were detected in food imports, with Cyprus among the countries with highest rates of food with banned pesticides.

We therefore ask the Cyprus Presidency to uphold European Standards by:

- Supporting EU's Commitment under the Vision for Agriculture and Food to end the
  export of hazardous pesticides banned in Europe and to apply the same safety
  standards to food, whether produced within the EU or abroad.
- Ensuring, in line with the omnibus proposal, that imported food complies with EU standards by lowering Maximum Residue Levels for EU-banned pesticides to 0.01 mg/kg (or the relevant detection limit), while supporting exporting countries in shifting to sustainable agricultural practices.

The Cyprus Presidency has a unique opportunity to support the protection of citizens, biodiversity, water resources, and the long-term viability of European agriculture. We urge you to demonstrate strong leadership by prioritising these essential issues and preventing a rollback of decades of EU health and environmental standards.

We remain at your disposal for further dialogue and technical input and look forward to your response. Together with our Cypriot partners, we will also organise a conference in Cyprus in late February 2026, where we would be pleased to welcome your participation and discuss these topics in greater depth.