

Mr. Magnus Heunicke

Minister for Environment and Gender Equality,

E-mail: mim@mim.dk, min@em.dk, miljoeministeren@mim.dk

Mr. Jacob Jensen

Minister of Food, Agriculture and Fisheries

E-mail: fvm@fvm.dk, min@fvm.dk

Ms. Marie Bjerre

Minister for European Affairs

Email: europaministeren@um.dk,

Subject: Urgent Actions Needed for Sustainable Agriculture and Pesticide Regulation in the EU

Dear Ministers Heunicke,

Dear Ministers Jensen,

Dear Ministers Bjerre,

The undersigned Danish NGOs (Rådet for Grøn Omstilling, Danmarks Naturfredningsforening, Dansk Ornitologisk Forening, Greenpeace Denmark), DANVA (Danish Water and Wastewater Association), NOAH, Friends of the Earth Denmark, and Pesticide Action Network (PAN) Europe are writing to you to ask for your support in taking decisive European actions on critical pesticide-related issues that directly impact public health, the environment, and the future of European agriculture. As Denmark will soon take over the Presidency of the Council of the European Union, it will have the opportunity to lead on these crucial matters. We call on you to prioritise the following key issues:

1. The need for an Immediate ban on PFAS Pesticides and action on TFA in our waters

In 2020, the EU committed to banning all non-essential PFAS chemicals in Europe. However, PFAS-containing pesticides were excluded from the proposal, based on the incorrect assumption that existing EU pesticide legislation sufficiently regulates them. PAN Europe's [studies](#) have disproved this assumption. Moreover, as PFAS pesticides are not necessary for crop production, they should be replaced with safer alternatives.

Currently, [32](#) PFAS pesticides are approved for use in the EU. Between 2011 and 2021, residues of 31 different PFAS pesticides [were detected in fruits and vegetables across the EU](#). The number of contaminated samples tripled over this decade. The continued authorisation of PFAS pesticides in the EU results in daily exposure of citizens to PFAS residues, while PFAS pesticide pollution—particularly through its main degradation product, trifluoroacetic acid (TFA)—continues

to [increase in our water sources](#). TFA is a highly persistent and mobile pollutant that contaminates water resources indefinitely. PAN Europe's studies found that TFA was detected in 34 out of 36 drinking water samples [tested across 11 EU countries](#). TFA cannot be removed from drinking water with existing treatment methods. In addition, the fact that all the [wines tested by PAN Europe and members](#) contained TFA in alarming concentrations underlines the widespread contamination of agricultural areas.

Based on industry regulatory studies, Germany has proposed classifying TFA as 'toxic to reproduction' (Category 1B), which warrants an immediate EU-wide ban. Denmark has the legal tools to prohibit all pesticides containing PFAS substances¹. We urge you to lead the Council in proposing a comprehensive ban on all PFAS pesticides

In light of these findings, we urge you to ensure that the European Council demand to the Commission to:

- Immediately suspend and withdraw the authorisation of all PFAS pesticides currently approved in the EU under Article 69 of Regulation 1107/2009.
- Swiftly adopt and implement the proposal for a general PFAS restriction according to REACH.
- Establish a parametric value for TFA in drinking water at EU level.
- Set quality standards for TFA for waters regulated under the Water Framework Directive
- Support to farmers in replacing the use of PFAS pesticides with other forms of crop protection - primarily chemical-free, secondarily less hazardous chemical compounds.

3. Effective Implementation of the Sustainable Use of Pesticides Directive

The Sustainable Use of Pesticides Directive (SUD) (Directive 2009/128/EC), adopted in 2009, aims to gradually reduce reliance on synthetic pesticides while protecting citizens and biodiversity from direct exposure. Since 2014, the use of Integrated Pest Management (IPM) has been mandatory under the directive, prioritising preventive measures, with synthetic pesticides being used only as a last resort. However, in the majority of Member States, no drop in pesticide use has been observed, while the protection of human health and nature is poorly implemented. Pregnant women, children, and vulnerable populations continue to be exposed to toxic pesticides near their homes and schools. Organic farming shows that farming without synthetic pesticides is possible, and that organic farmers are leaders in developing and implementing alternatives to synthetic pesticides. We therefore urge you to

- Ensure the full implementation of the current SUD across the EU by enforcing the effective application of IPM Protect citizens from direct exposure to pesticides by banning their use in public spaces and promoting such regulations at the European level.

¹ Under art.44 from regulation 1107/2009, Member States must take into account new scientific evidence and restrict or ban pesticides that do not comply anymore with the safety criteria of article 4.

- To enforce the implementation of the eight IPM-principles, including crop rotation (principle 1), mandatory use of monitoring harmful organisms before spraying (principle 2), and the use of partial application (principle 6).
- To enforce and to aim on EU level for mandatory buffer zones free of synthetic pesticides next to residential and protected areas.
- Take effective measures to achieve ambitious pesticide reduction targets in line with citizens' demands.

Scientific evidence confirms that farmers can reduce pesticide use by 50-80% while maintaining comparable yields, through Integrated Pest Management (IPM). However, implementation of IPM is insufficient, also due to a lack of technical support. Member States are obliged to provide independent advisory services under the SUD, yet this is not being properly implemented.

- The Danish Presidency should advocate for CAP funding or additional funding to support farmers in transitioning to low-input, sustainable farming methods.

3. Preventing Unfair Competition and Stopping Double Standards

EU farmers are prohibited from using certain hazardous pesticides, yet imports from third countries still contain residues of these same substances, exposing EU consumers to unacceptable risks. Meanwhile, EU companies continue exporting banned pesticides abroad, contributing to environmental and health crises globally. A study conducted by Public Eye and Unearthed (Greenpeace UK) revealed that in 2018, EU member states approved the export of 81,165 tonnes of pesticides that are banned within the EU due to their unacceptable risks to human health and the environment. These substances are predominantly exported to low- and middle-income countries. Despite commitments at international forums and by the European Commission under the EU's Chemical Strategy for Sustainability and recently the Vision for Agriculture and Food to end the production and export of hazardous chemicals banned in the EU, no concrete regulatory steps have been taken up to now. In this regard we welcome [your letter of support](#) together with 7 Member States, to Environment Commissioner Roswall on the need to keep the high level of ambition and deliver the promised proposal to end the export of hazardous chemicals that are banned in the EU in order to protect the human health and environment worldwide.

The use of EU-banned pesticides in non-EU countries creates unfair competition for European farmers while exposing European consumers, environment and insects to harmful substances through imported food products. Encouragingly, the EU's recent *Vision for Agriculture and Food* and Commissioner Christophe Hansen's statement during the AGRIFISH Council meeting on January 27, 2025, both emphasized a strong commitment to ensuring that imported food complies with the same standards as those required within the EU.

To uphold fair competition for European farmers and protect consumers, we ask that you:

- Ensure that imported food meets EU standards by lowering Maximum Residue Limits (MRLs) for all EU-banned pesticides to the default detection limit of 0.01 mg/kg or the

relevant limit of determination. At the same time, EU must provide aid and technical expertise to low-income countries, in order to make them able to meet these lower limit values when exporting food to EU-countries

- Take concrete action to halt the export of banned pesticides and implement stricter regulations on the export of active substances and plant protection products.

The upcoming Danish EU Presidency has a unique opportunity to shape policies that will protect human health, biodiversity, and European agriculture. We urge you to prioritise these essential issues and demonstrate Denmark's leadership in fostering a sustainable and pesticide-free future. We look forward to your response and are open to further discussions to support the implementation of these necessary reforms.

02. July. 2025

Yours sincerely,

Christian Ege
Seniorkonsulent
Rådet for Grøn Omstilling

Martin Dermine
Executive Director
Pesticide Action Network (PAN) Europe

Signatories:

Danmarks Naturfredningsforening
Dansk Ornitologisk Forening
DANVA (Danish Water and Wastewater Association)
Greenpeace Denmark
Landsforeningen Praktisk Økologi
NOAH, Friends of the Earth Denmark

