



Pesticide  
Action  
Network  
Europe

**Major flaw in EFSA's  
pesticide risk assessment  
policy.**

**Brussels, 09-05-2023.**

**Contact : Hans Muilerman**  
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To: Food Authority EFSA  
Mr. Url.

Concerning: Negative effects on biodiversity not taken into account.

Dear Mr. Url, On March 8, 2023 we wrote a letter to you asking to take into account indirect effects of pesticides. On May 2, 2023 we received your reply that to our feeling fails to address our concerns and arguments.

Our letter was about indirect effects of pesticides on the environment and we presented a range of research data showing examples of what is missing in EFSA's approach. In your answer, you do not answer the scientific evidence we shared with you. Instead, you promote SPGs, specific protection goals, which were first promoted by the pesticide industry and then by the EFSA. As acknowledged by the JRC during the meeting from the Commission on SPGs in 2019, this approach does not take all indirect effects into account. While we wrote to you to engage into a scientific discussion, we feel that your answer does not cover the points we have raised, which is, in our view, not acceptable, from the EU scientific agency responsible for pesticides.

As agreed by the JRC, SPG is not protecting all ecosystems and biodiversity, as it is based on the flawed concept of 'Ecosystem services' (for humans), a concept designed by a pressure group of industry-linked experts (see attached SETAC meeting in 2009). SPG aims to protect one or two elements of ecosystems that are profitable for companies and does not protect the many millions organisms that are part of biodiversity and not protect the many essential network relations in ecosystems. SPG is a way of continuing to allow the disastrous effects of pesticides under a new (false) flag.

In your answer, you mention that the SPG-concept is positively considered by stakeholders. It is indeed the case for the industry but PAN Europe and other NGO's have been protesting the flawed approach from the start. And we continue doing so. We are therefore astonished, and very concerned, that your letter does not reflect the reality.

Additionally, our suggestions on using the German/Swedish approach on indirect effects was not addressed in your letter as well.

PAN Europe therefore respectfully asks you to send us a new answer, that addresses the scientific arguments we have sent you, in order to engage in a constructive scientific discussion. Indeed, the protection of the environment and biodiversity against pesticides, must be a priority, as mentioned in the pesticide regulation (EU) 1107/2009 and as confirmed by the case law of the Court of Justice of the EU.

Thank you in advance for your scientific response.

Best regards,  
PAN Europe  
Hans Muilerman