



## Open Letter to the Cyprus Presidency of the Council of the European Union

To: The Cyprus Presidency of the Council of the European Union  
Attn: Ms Christina Rafti, Permanent Representative of Cyprus to the European Union

Cc:  
Permanent Representatives of the EU Member States

Brussels, 28 May 2026

**Subject: Need for proper scrutiny and expert deliberation on the Food and Feed Safety Omnibus Proposal**

Dear Representatives of the Cyprus Presidency of the Council of the European Union,

**We, the undersigned public health, environmental protection, and consumer rights organisations, are writing to express our serious concerns regarding the accelerated pace of negotiations on the Food and Feed Safety Omnibus proposal and the limited opportunity for thorough scrutiny, informed debate, and meaningful expert engagement.**

The current proposal significantly weakens EU protections for human health, biodiversity, water quality, and food safety from hazardous pesticides. Regulation (EC) No 1107/2009 was built on the precautionary principle and on the recognition that pesticides, as intrinsically toxic substances, require the highest level of protection for human health and the environment.

Most alarmingly, the proposal would make unlimited approval periods for synthetic pesticides the norm, shifting the burden of proof from industry to public authorities and taxpayers. [Our analysis](#) shows that 49 pesticides, including glyphosate, acetamiprid, and PFAS substances, would automatically receive unlimited approval if the proposal were to enter into force on 1

January 2027. We are particularly concerned that **these far-reaching changes are being advanced without an impact assessment, in disregard of the EU's Better Regulation principles and requirements for evidence-based policymaking**. In light of both the absence of such an impact assessment and the implications of the proposed reforms for the EU pesticide framework, **we urge the Presidency to ensure that Member States are given sufficient time to carefully examine the proposal and fully assess its consequences before political positions are adopted**. The current process risks reducing discussion to a simple endorsement of the Commission proposal, despite the deeply worrying implications for public health, human rights and environmental protection.

Our concerns are further reinforced by the fact that your Presidency not only suggests maintaining the Commission's proposal to allow unlimited approval periods for most active substances, but also introduces time-unlimited authorisations for products containing active substances granted unlimited approval. Therefore, based on the current Presidency's proposal, the toxicity of these pesticides would not be subject to any further systematic review at either EU or Member State level. Meanwhile, **insufficient attention is being given to credible and feasible alternatives to the 'unlimited approvals' proposal that could effectively address the current bottlenecks in the implementation of the pesticide regulation**. In [written answers](#) sent on 8 May to French MP Benoît Biteau and the Croatian MEP Biljana Borzan, the European Food Safety Authority (EFSA) stated that, with the recruitment of an additional 50 staff and associated budget, the current backlog in pesticide assessments could be addressed within three years. EFSA also clearly stated that if rapporteur Member States were to exercise their power to reject incomplete industry dossiers as inadmissible, "this would reduce the workload for Member States and EFSA and could thus contribute to the prevention of future backlogs". This clear solution proposed by EFSA deserves serious consideration and discussion in the Council before legislative changes are pursued under the Food and Feed Safety Omnibus, which bears a major risk of undermining EU protections of the environment and human health, based on the precautionary principle.

Furthermore, an [independent scientific assessment](#) commissioned by the Dutch Parliament concluded that the **proposal to grant unlimited approval to active substances is unlikely to achieve its stated objectives**. According to the assessment, the reforms would neither reduce administrative burdens nor accelerate innovation or the approval of alternative biocontrol products. Instead, they risk prolonging the presence of harmful substances on the market, increasing administrative complexity, and shifting responsibilities from pesticide producers to public authorities.

In light of these concerns, we respectfully call on the Cyprus Presidency to:

- Allow more time for scrutiny and democratic deliberation, with greater transparency throughout the process;
- Ensure meaningful involvement of independent scientific experts, competent authorities, and civil society organisations in discussions, through the organisation of expert hearings and debates;

- Dedicate time during the next Council meeting to examine EFSA's alternative suggestions and discuss options that address procedural bottlenecks without weakening protections.

The decisions currently under discussion will shape the future of the EU pesticide regime for years to come. Such consequential reforms require careful, evidence-based deliberation, not a hastily expedited process that risks undermining scrutiny, informed debate and a high level of protection.

We thank you for your attention and remain available for further discussion.

Sincerely yours,

Dr Martin Dermine  
Executive Director  
PAN Europe

On behalf of:

**European / International Organisations**

- Agroecology Europe
- BEUC - The European Consumer Organisation
- BirdLife Europe and Central Asia
- Child Rights International Network (CRIN)
- ClientEarth
- Corporate Europe Observatory
- EEB - European Environmental Bureau
- foodwatch International
- Friends of the Earth Europe
- Greenpeace European Unit
- HEAL - Health and Environment Alliance
- Pesticide Action Network Europe

**National Organisations**

- Ecologistas en Acción (Spain)
- Générations Futures (France)
- GLOBAL2000 (Austria)
- Lipu BirdLife Italia (Italy)
- NABU e.V. (Germany)
- Natagora (Belgium)
- Nature & Progrès Belgique (Belgium)
- Natuur & Milieu (Netherlands)
- Pesticide Action Network Germany (Germany)
- Quercus - Associação Nacional de Conservação da Natureza (Portugal)