



**Environmental  
Pillar**

## **Open letter to the Irish Presidency of the EU Council**

To:

Mr. Darragh O'Brien Minister for Climate, Energy and the Environment,

Ms. Jennifer Carroll MacNeill Minister for Health

Mr. Martin Heydon Minister for Agriculture, Food and the Marine

Cc:

Ms. Aingéal O'Donoghue, Permanent Representative of Ireland to the European Union

Brussels, 6 July 2026

**Subject: Urgent call to strengthen the Council position on the Food and Feed Safety Simplification Omnibus proposal**

Dear Ministers,

Pesticide Action Network Europe (PAN Europe) and the Environmental Pillar urge the Irish Presidency of the Council to support significant improvements to the Council's position on the Food and Feed Safety Simplification Omnibus proposal. We also wish to reiterate the [concerns](#) previously raised by public health, environmental protection and consumer rights organisations about the accelerated pace of negotiations.

**In a series of scientific papers and statements<sup>1</sup>, prominent scientists and legal experts have repeatedly warned that the Food and Feed Safety Simplification Omnibus proposal significantly weakens EU protections** for human health and the environment against hazardous pesticides. In particular, the proposal to make unlimited approval periods for synthetic active substances the norm shifts the burden of proof from industry to public authorities and taxpayers, and significantly reduces scientific scrutiny. Such a change is being advanced without an impact assessment, contrary to the European Commission's Better Regulation principles and the EU's commitment to evidence-based policymaking.

**We welcome the fact that the text presented by the Cyprus Presidency improves the Commission proposal by limiting unlimited approval periods to low-risk substances.** However, we remain concerned that the Council's draft position significantly extends approval periods for other pesticide active substances, by five years for first approvals and ten years for

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<sup>1</sup> [EU Omnibus proposal increases pesticide risks | Science](#); [Leading scientists from many disciplines call for better -not weaker- protection against pesticides](#); [Scientists impact assessment](#); [Periodic Reassessment or Permanent Approval?; Proposals of the EU Commission reduce the level of protection for humans and the environment - Leopoldina](#); [Omnibus X : Lettre ouverte au Président de la République Française](#); [Legal Opinion Food and Feed Safety Omnibus](#)

renewals. Meanwhile, there are no effective review mechanisms to ensure that approvals can be promptly reconsidered whenever new scientific evidence raises concerns about risks to human health or the environment.

Finally, we note that [EFSA's statement](#) for an alternative approach, where an additional 50 experts, combined with stricter rejection of incomplete industry dossiers, could clear the backlog within approximately three years, needs to be taken into consideration.

**We are also concerned that the Council has retained several other highly problematic elements of the Commission proposal.** In particular, the proposed extension of grace periods allowing continued use of pesticides following non-approval/non-renewal decisions, together with the relaxation of rules governing derogations, would weaken the level of protection and prolong exposure to substances that have been found no longer to meet the required safety standards. Last, we consider alarming it that Member States' ability to use the latest scientific knowledge when assessing pesticide authorisations is restricted to the conclusions of the most recent EU assessment.

**Finally, we are concerned by proposals to expand the definition of biocontrol to include heavy metals and their salts**, such as copper. Copper is persistent and [harmful to terrestrial and aquatic biodiversity and ecosystem functions](#), including [soil microbial diversity](#) and therefore should not be considered a natural way to combat pests.

We therefore respectfully urge the Irish Presidency to strengthen the Council position by:

- maintaining time-limited approvals for pesticide active substances, supported by strong review mechanisms under 21 of Regulation (EC) No 1107/2009;
- rejecting provisions that extend grace periods and weaken the conditions governing derogations under Article 4(7);
- rejecting provisions that restrict Member States' ability to use the latest scientific knowledge when assessing pesticide authorisations;
- promoting practical solutions to address assessment backlogs, including increased resources for EFSA and stricter admissibility requirements for industry dossiers;
- ensuring that hazardous heavy metals, including copper and its salts, remain excluded from the definition of biocontrol products.

We trust that the Irish Presidency will uphold the Union's commitment to the precautionary principle and to ensuring a high level of protection for human health and the environment.

Yours sincerely,

Martin Dermine  
Executive Director  
Pesticide Action Network Europe

On behalf of PAN Europe and the Environmental Pillar