



**Environmental Pillar**  
Working for a sustainable future

The Environmental Pillar  
MACRO Centre  
1 Green Street  
Dublin 7  
Tel: 01 878 0116  
[www.environmentalpillar.ie](http://www.environmentalpillar.ie)

Darragh O'Brien Minister for Climate, Energy and the Environment,  
Jennifer Carroll MacNeill Minister for Health  
Martin Heydon Minister for Agriculture, Food and the Marine

08/06/2026

**Subject: Need for leadership regarding on the Food and Feed Safety Omnibus Proposal**

Dear Ministers,

On behalf of the Environmental Pillar, we are writing in advance of the Council discussions on the Food and Feed Safety Omnibus Proposal concerning EU pesticide legislation, with Member States expected to agree their position on 12 June 2026.

We welcome elements of the current Council text which restrict unlimited approvals to low-risk substances. This represents an important step towards aligning pesticide regulation with the EU's legal obligations to protect human health and the environment.

However, we remain deeply concerned that provisions allowing extended grace periods and derogations for banned pesticides remain unchanged. These loopholes risk undermining the integrity of the regulatory system, prolonging exposure to harmful substances, and delaying necessary transitions to safer alternatives. In practice, they can allow substances identified as hazardous to continue to circulate in the environment for years after a decision to prohibit them has been taken.

In parallel, a significant number of highly hazardous active substances remain under consideration within the SCoPAFF committee. The continued renewal or delayed non-renewal of such substances is inconsistent with the precautionary principle and with the requirements of EU law, including the obligation to ensure a high level of protection for health, water quality, and biodiversity. Accelerating the phase-out of these substances would not only reduce environmental and public health risks, but also help to alleviate the growing backlog and pressure on regulatory processes.

Environmental Pillar Members: An Taisce. Bat Conservation Ireland. BirdWatch Ireland. CELT (Centre for Environmental Living & Training). Cloughjordan EcoVillage. Coastwatch Ireland. Cultivate. Eco-Advocacy. ECO-UNESCO. Feasta (Foundation for the Economics of Sustainability). Friends of the Earth. GIY. Global Action Plan. Gluaiseacht. Good Energies Alliance Ireland. Green Economy Foundation. Green Foundation Ireland. Green Sod Ireland. Hedgerows Ireland. IPCC (Irish Peatlands Conservation Council). Irish Bee Conservation Project. Irish Cycling Campaign. Irish Seed Savers. Irish Whale and Dolphin Group. Irish Wildlife Trust. Leave No Trace Ireland. Rediscovery Centre. Sonairte. Streamscapes. Talamh Beo. The Environmental Forum. The Organic Centre. Vincent Wildlife Trust. VOICE Ireland. Wildlife Rehabilitation Ireland. Zero Waste Alliance Ireland.



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In this context, we urge Ireland to take a strong and constructive position in Council by:

- Opposing any further extension of grace periods and derogations for banned pesticides;
- Supporting stricter timelines and conditions to ensure that hazardous substances are removed from use without delay;
- Advocating for a more precautionary and transparent approach within SCoPAFF, including prioritisation of the most harmful substances for non-renewal;
- Promoting regulatory clarity and ambition in line with the objectives of the Farm to Fork Strategy and the EU Biodiversity Strategy.

Ireland's forthcoming Presidency of the Council of the European Union presents a critical opportunity to demonstrate leadership on pesticide reduction and environmental protection. A clear commitment to strengthening pesticide governance would send a strong signal of Ireland's intent to uphold EU environmental law and to support a transition towards more sustainable agricultural systems.

We would welcome the opportunity to engage further on this issue and to support Ireland in advancing a more protective and coherent approach at EU level.

Yours sincerely,

**Fintan Kelly**  
**Senior Land Use Officer,**

**On behalf of the Environmental Pillar**