PAN Europe submission to the call for evidence on the evaluation of the Biocidal Products Regulation (BPR)

5 March 2026

Pesticide Action Network Europe (PAN Europe) welcomes the opportunity to contribute to the call for evidence on the evaluation of the Biocidal Products Regulation (EU) 528/2012 (BPR) .

PAN Europe is a science-based network of toxicologists, legal experts, and policy officers, representing over 50 organisations across Europe, including consumer groups, public health and environmental organisations, trade unions, women's associations, and farmers' groups. Our mission is to reduce dependency on hazardous pesticides and to promote ecologically sustainable and socially just alternatives. Our network has extensive expertise in European and national pesticide and biocide legislation, including implementation and enforcement. PAN Europe fully **supports the submissions of our members, PAN Germany and Générations Futures, to both the call for evidence and the targeted consultation**. We align with their recommendations and concerns regarding the evaluation and implementation of the BPR.

Biocidal products are inherently hazardous, designed to kill or deter unwanted organisms. Their use inevitably exposes humans, including the most vulnerable public, animals and the environment. High regulatory standards are therefore essential to ensure that the placing on the market and use of biocidal products achieve a high level of protection for health and the environment, as required by the BPR. However, significant challenges remain in the implementation of the regulation, which hinder its ability to achieve its objective of ensuring a high level of protection.

1. **Incomplete review programme**: The review programme initiated in 2000 has been repeatedly extended, most recently to 2030. As of September 2025, only 51% of existing active substances have been fully evaluated, according to the Commission. This results in a significant proportion of products remaining subject to transitional national rules and having not yet been assessed against the safety and efficacy criteria of the BPR. This poses potential risks to human health and the environment while discouraging the development of safer alternatives. This issue should be urgently addressed by ensuring that Member States' competent authorities and ECHA are allocated sufficient resources, and by ensuring that incomplete or inadequate dossiers are rejected.

2. **Delayed incorporation of new data**: Scientific evidence raising concerns about the impact of biocide products or treated articles on health and/or the environment is not being incorporated quickly enough. Article 15 review procedures must be used more promptly.
3. **Substances meeting exclusion/substitution criteria remain on the market**: Exemptions under Article 5.2 must be strictly limited and used in exceptional circumstances.
4. **Risk management measures (RMM) are often unrealistic**: Authorised products must only rely on RMMs that are proven effective and controllable.
5. **Insufficient assessment of risks**: Emerging risks, including antibiotic/antifungal resistance, disinfection by-products, metabolite formation (e.g., TFA from PFAS), and cumulative exposure, must be fully considered in BPR evaluations.
6. **Lack of transparency**: ECHA databases must include all products on the market, including those under transitional provisions, with data on sales volumes to support risk assessment and public information.

The BPR should strengthen provisions for the safe and sustainable use of biocides, including mandatory integrated pest management (IPM), use of synthetic biocides only as a last resort, and better training for users. High protection of human and animal health and the environment must remain the guiding principle, underpinned by the precautionary approach.

PAN Europe rejects the proposal in the Food and Feed Safety Simplification Omnibus to introduce unlimited approval periods for active substances as the standard under the BPR, except for candidates for substitution. Removing the requirement for periodic renewal would weaken the regulatory framework and reduce the level of protection for human health and the environment. This proposal is particularly concerning given that, as highlighted above, the existing system of re-assessment is already severely delayed and many substances have not yet been fully assessed under the BPR criteria. Such a reform would further undermine the system's ability to ensure up-to-date risk assessment.

PAN Europe urges the Commission to take these steps to ensure that the BPR fulfills its intended purpose: a strong, protective, and science-based framework for biocidal products in the EU, to the benefit of citizens' health, animal's health and the protection of the environment.

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