

Comments on the call for evidence for simplification of administrative burden in environmental legislation

PAN Europe

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PAN Europe welcomes the opportunity to contribute to the [call for evidence](#) for simplification of administrative burden in environmental legislation.

PAN Europe is a science-based organisation composed of toxicologists, legal experts and policy officers. We bring together more than 50 consumer, public health and environmental organisations, trades unions, women's groups and farmer associations from across Europe. Together, we work to eliminate the dependency on pesticides and to replace their use with ecologically sound and socially just alternatives. We have extensive expertise in European and national pesticide legislation and its implementation. Accordingly, our contribution will address this specific aspect of the environmental legislation.

We note that the stated aim of this initiative is to “reduce administrative burden *without undermining the environmental objectives pursued by the concerned legislation*. (...) measures should reduce the cost of reporting, monitoring, notifying, auditing, and other administrative obligations as well as streamline administrative procedures. *The policy measures should enable the environmental objectives of the EU legislation to be reached in a more effective and cost-efficient way, with a view to making it easier for EU industry to comply with and increasing the effectiveness of environmental policy*. They should also reduce demands on Member State competent authorities, allowing for better enforcement and implementation.”

As emphasised in the European Commission's initiative document, it is crucial that the forthcoming initiative does not in any way undermine existing pesticide legislation, including Regulation (EC) 1107/2009 and Directive 2009/128/EC. These two pieces of legislation are cornerstones of EU health and environmental policy. Regulation (EC) 1107/2009 is designed to ensure, as a priority, a high level of protection for human health, animal health, biodiversity, and the environment from pesticides. Directive 2009/128/CE aims to reduce pesticide risks and impacts, including through the requirement to apply integrated pest management (IPM). IPM

prioritises preventative measures and non-chemical alternatives, with chemical pesticides only used as a very last resort. **Both are indispensable tools to protect people, nature, and food systems from pesticides. In light of overwhelming scientific evidence of pesticide harms, the urgent task is not a reduction of approval requirements leading to weaker health and environmental protections, but effective enforcement and full implementation of current legislation.**

As [documented](#) by the EU-funded project SPRINT, European citizens are continuously exposed to a cocktail of pesticide residues through air, water, house dust, and food, and their impacts extend far beyond agricultural areas. [Biomonitoring data](#) indicate the presence of these chemicals, often in combination, in both adults and children. Alarming, synthetic pesticides are engineered to kill insects, fungi, and weeds, but they can also interact with human cells and organs, posing serious risks to health.

Chronic exposure to pesticides has been linked to a [wide range of diseases](#), including many types of cancers, respiratory illnesses, reproductive disorders, neurodegenerative diseases, and developmental delays in children. Farmers, agricultural workers, and rural communities face heightened risks, with evidence pointing to increased incidences of blood cancers, prostate cancer, and Parkinson's disease. Children, who are especially vulnerable as their bodies and neurological systems are still developing during both prenatal and early postnatal stages, were shown to develop cognitive disorders due to early life exposure to pesticides.

The [environmental impacts](#) are even better demonstrated by science. Pesticides contaminate terrestrial and aquatic ecosystems, threatening countless species and their habitats. [Pesticide drift](#), for instance, has been shown to reduce wild plant diversity by over 50% within 500 metres of treated fields, drastically limiting resources for pollinators. This decline in biodiversity undermines crucial ecosystem services, such as pollination, pest control, and soil health, that are vital for sustainable agriculture and food security.

Public concern about pesticides is high and consistent. The broad demand for pesticide reduction has been regularly shown in the EU over the last years, through [consultations](#), [EU barometers](#), [opinion polls](#) and two successful [European citizen initiatives](#). These demands for safer food and healthier environments should not be dismissed by the EU institutions.

In terms of EU pesticide legislation, **the main problem lies not in legislative design, but in poor implementation.** Inadequate enforcement by the industry and the Member States, often due to lack of resources, undermines the legislation's objectives for human health and the environment, while transitioning towards more sustainable agricultural practices.

The lack of implementation of Directive 2009/128/EC and shortcomings in the National Action Plans have been repeatedly acknowledged by EU institutions ([European Commission](#), [European Parliamentary Research Service](#), [European Court of Auditors](#)). In contradiction to the obligations of Regulation (EC) 1107/2009, harmful pesticides remain on the EU market, and risk assessment still contains [fundamental flaws](#).

In fact, **weak implementation itself creates unnecessary administrative burdens** (delays, duplications, and inefficiencies) which could be avoided with stricter compliance and robust enforcement. For instance, the industry's nearly systematic failure to comply with data requirements results in delays in assessments, increases workload for regulators, and prolongs citizens' and ecosystems' exposure to hazardous pesticides. The lack of, for example, independent advisory systems with broad expertise in IPM and non-chemical alternatives, although required by the SUD, has been an important barrier in IPM implementation.

Sufficient evidence demonstrates that the current pieces of legislation are not protective enough, predominantly due to their insufficient implementation. Delaying the long-overdue full implementation of this legislation, would further aggravate the alarming health, environmental, biodiversity and climate crises, with unacceptable societal impacts. It prevents the establishment of a clear, future-proof and supportive framework for farmers, who want to endorse sustainable agricultural practices, which is essential to ensure food security for future generations.

Therefore, the focus should be on tools that improve the implementation and enforcement of the pesticide legislation.

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