

2024



Pesticide
Action
Network
Europe

ACTIVITY REPORT

INTRODUCTION



Who we are

Pesticide Action Network (PAN) Europe is an independent expert-based organisation. We work with our legal and scientific experts in a rigorous and evidence-based manner. We expose the harms of pesticides and promote sustainable alternatives. With our 51 member organisations across Europe, we support farmers in reducing their dependency on pesticides and assist regulators in enabling this transition. To achieve a pesticide-free future, we conduct scientific research, lead court cases, and engage with European policymakers. Our work helps protect our health and the environment, while promoting safer, more resilient farming practices.

Video: [PAN Europe's vision](#)

Quote from the President

In 2024, PAN Europe continued to play its role as a whistle blower on health and environmental scandals related to pesticides. The EU started taking action regarding the presence of toxic PFAS pesticide metabolite TFA in the water we drink and in the environment thanks to the relentless work of the 'PAN Europe' network. PAN Europe also brought to light new conflicts of interests in the way the EU is revising its policy on insect protection. It is thanks to the expertise and the incredible commitment of PAN Europe's staff that a considerable amount

of work has been produced in 2024. The entire board and myself are very grateful for the motivation and efforts of PAN Europe staff to make the EU a safer place.



Koen Hertoge
president PAN Europe

Year in brief

In 2024, we made important steps in banning some of the most hazardous pesticides. On the other hand, a real setback was the complete withdrawal by the EU Commission of its flagship pesticide legislative proposal from the EU Green Deal. The upgrade of the Sustainable Use of Pesticides Directive (SUD) to a Regulation (SUR) should have resulted in legally binding measures to achieve a 50% reduction in pesticide use and risk in general and 50% reduction in use of the more hazardous ones by 2030. Moving back to the previous situation where Member States were not acting to reduce pesticide use is not an option.

"Save Bees and Farmers" European Citizens' Initiative, in which over one million citizens urged the EU to take action toward a pesticide-free Europe must be heard. The desire of EU citizens to live in a healthier environment was clearly reflected in EU Barometers and an IPSOS poll, and needs to be addressed. This is the same for the farmers' demand for a clear path toward resilient and economically viable agriculture, a central message in recent farmers' protests across the EU. Pesticide dependence harms farmers' health, imposes high and unnecessary costs and degrades soil fertility and pollination, which are vital for our food system.

With our members we managed to expose trifluoroacetic acid (TFA), as a hidden threat in Europe's water, a small PFAS metabolite from PFAS pesticides. We assisted in activating the EU's review mechanism to come to the restriction or ban of dangerous substances, such as acetamiprid and flufenacet.

Finally, PAN Europe has won 2 EU court cases, where the Court of Justice of the EU clarified the responsibilities of Member States, when it comes to assessing the risk posed by pesticides to human health and the environment. This new step should lead to a better protection of our health and environment.



Dr Martin Dermine
executive director

Major results

- The EU finally started to ban some Endocrine-disrupting (ED) pesticides in 2023 and continued to do so in 2024. They pose a serious risk to human health, particularly during pregnancy and early childhood. During early life, EDs can cause irreversible harm, even in very small concentrations. PAN Europe has been working against the use of ED pesticides for more than 10 years. We regularly remind the EU of their obligation to ban these chemicals. [Read more](#)
- EU laws are often poorly implemented, while existing loopholes favour the pesticide industry. Until 2021, NGOs could not challenge EU pesticide approvals—while the industry always had that right. After a long legal battle by the NGO community, we finally gained access to justice and started to have a clear say. In 2024, in a case launched by PAN Europe and members, the EU Court clarified how EU Member States must assess pesticides, including recent independent scientific studies and putting an end to the common practice of giving priority to decades-old industry studies. EU Court also confirmed that Member States are responsible to verify that pesticides are not endocrine disruptors, before authorising them. We also started a court case to challenge the re-authorisation of glyphosate. [Read more](#)
- Following our advocacy work for our Toxic 12 campaign, the EU has banned some of the most dangerous pesticides, including Dimoxystrobin and Ipconazole. From our Toxic 12 list are now 10 to go. After we sent new scientific evidence, the EU also lowered the maximum permitted levels for the neurotoxic acetamiprid in food. But much remains to be done. We are also pushing to stop EU-banned pesticides from being exported. They return as residues in our food and harm communities in third countries. This also leads to EU Farmers facing unfair competition. [Read more](#)
- We engage with civil society, organising events and actions that bring citizens' concerns about pesticides directly to EU institutions. We launched a petition to the EU Commission calling for pesticide reduction, gathering 260,000 signatures in just three months. This echoes the success of the Save Bees and Farmers European Citizens' Initiative (ECI), represented by PAN Europe, in which over a million people demanded pesticide reduction, biodiversity recovery and support for farmers. [Read more](#)
- We continue to expose the harm pesticides cause to human health, biodiversity, and the environment, through our campaigns. Our recent research shows that PFAS pesticides—so-called “forever chemicals”—release TFA, a toxic, highly persistent pollutant, contaminating Europe's water systems. Read more [here](#). We have also revealed how outdated, industry-driven EU guidelines fail to protect insects and other arthropods, essential for life. Read more [here](#).



EU POLICY AND JUSTICE ON PESTICIDES 2024



Development of a new regulation to reduce pesticide use

Over these last years, PAN Europe has been actively involved in discussions on the EU Commission proposal for a Regulation on the Sustainable Use of Pesticides. This proposal aimed to update the existing Directive and introduce legally binding targets to reduce pesticide dependency. Unfortunately, the proposal was withdrawn and now entirely abandoned by the new Commission. Despite this setback, our work has positively contributed to raise awareness and increase the knowledge on Integrated Pest Management and alternatives to pesticides among Member States. These principles were already agreed in the 2009 Directive on the Sustainable Use of Pesticides, and should be the norm since 2014. We continue to push for its proper implementation.

Read more: [Black Day for Health and Biodiversity: EU Commission withdraws proposal for Pesticide Reduction](#)

Legal victory

As a result of three national court cases carried out by PAN Europe in the Netherlands, questions for preliminary rulings were sent to the EU Court. The cases were challenging the authorisation of products containing active substances that are endocrine disruptors, according to recent science. The Court clarified responsibilities for Member States in the frame of the risk assessment, where the latest independent scientific findings have to be taken into account. This will significantly improve the way Member States carry out the risk assessment of pesticide formulations.

The Court also clarified that a Member State cannot use the evaluation of another Member State without checking its completeness and its quality. Moreover, it made clear that if the active substance is classified as an endocrine disruptor, the product can not be authorised. This will speed up the ban of endocrine disrupting pesticides, in favor of human health of the most vulnerable groups.

Read more: [EU Court: member states do not properly carry out pesticide assessments](#)

Reducing levels of acetamiprid in food

PAN Europe alerted the EU Commission to new scientific evidence that shows that neonicotinoid insecticides, like acetamiprid, have neurotoxic properties and present a risk for healthy pregnancies, unborn babies and young children. EFSA was requested by the Commission to produce a new scientific opinion, which concluded that Maximum Residue Levels (MRLs) of acetamiprid should be strongly reduced in EU food, to protect foetal development in pregnant women. Member States and the Commission also agreed to send a new mandate to EFSA, to revise the most up to date scientific information on acetamiprid, in order to eventually ban it. Neurotoxicity and developmental neurotoxicity of pesticides are not properly assessed. The EU post-monitoring control system has been activated thanks to our action, increasing the level of protection for European citizens.

Read more: [Acetamiprid: the brain-toxic neonicotinoid we must urgently leave behind](#)

Legal challenge against glyphosate

The European Commission re-approved glyphosate for 10 years, despite an impressive body of scientific evidence indicating its toxicity to human health and the environment. In January 2024, PAN Europe together with five member NGOs took the first step to start the legal challenge against glyphosate re-approval by the EU. Also we keep working to get Member States to ban glyphosate-based herbicide at national level.

Read more: [NGOs initiate legal challenge against EU glyphosate re-approval](#)

Commission urged to replace most toxic pesticides

Thanks to our Toxic 12 campaign and following a complaint filed by PAN Europe, the EU Ombudsman urged the European Commission to speed up the substitution of the most hazardous pesticides within the EU. The EU Commission knows well, that the rules for replacing the most toxic pesticides -flagged as 'Candidates for Substitution'- have not been properly implemented. The Commission has still not taken decisive action to fix the problem, the Ombudsman highlights. As a result, harmful pesticides are still being used longer than they should be. Also, the Ombudsman concludes the Commission should adopt more stringent rules on conflicts of interest with their stakeholders and allow the participation of stakeholders other than the pesticide industry in its work.

Read more: [EU Ombudsman urges Commission to prioritise substitution of most toxic pesticides](#)



PESTICIDE TOPICS IN 2024

TFA is polluting our water

PAN Europe and members raised the alarm on the increasing contamination of EU waters with PFAS metabolite residues. The extremely persistent trifluoroacetic acid (TFA) metabolite - a 'tiny' PFAS because of its short 2-carbon chain compared to other PFAS - can be found in surface, groundwater and drinking water. We detected it not only in tap water, but also in mineral water from some of Europe's most pristine sources. It cannot be filtered out by standard water treatment methods, and the alternatives are costly, energy-intensive and strip water of its natural minerals. Considering the fact that the German Chemical Agency requested the European Chemicals Agency (ECHA) to classify TFA as a substance toxic to reproduction category 1B, its ever-increasing presence presents an important risk for the future of water supplies in the EU. Consecutively to our work, public and private water companies initiated their own tests to measure TFA, while our campaign triggered important concerns among the general public, and decisionmakers started to take this issue seriously.

Quote:

Reports: [TFA The Forever Chemical in the Water that We drink](#)
[TFA in Water: Dirty PFAS Legacy Under the Radar](#)
[Toxic Harvest: The rise of forever PFAS pesticides in fruit and vegetables in Europe](#)

Video: [TFA - The toxic threat to our water](#)

Campaign: [Ban PFAS pesticides and TFA](#)



An EU guideline with far reaching consequences for biodiversity

Arthropods — bees, beetles, butterflies, millipedes, spiders and many more — make up over 80% of all known animal species and are vital to life on Earth. Over the past 25 years, flying insect biomass has dropped by 75% in Europe, particularly in proximity to agricultural zones. One major culprit is the use of synthetic pesticides.

Although the EU law aims to protect biodiversity and ecosystems, pesticides used today are very toxic for non-target arthropods. PAN Europe's investigation exposed that an outdated guidance document was used for the impact assessment of pesticides on arthropods. It was written in collaboration with the pesticide industry and contains serious shortcomings and flawed concepts. For example, it assumes that when a pesticide causes 50% mortality in insects and other arthropods, their population will fully recover. Alarming, even 100% mortality can be deemed 'acceptable'. It also overlooks the reality that pesticides are used in mixtures, exposing organisms to a constant cocktail of harmful chemicals.

The European Commission finally sent EFSA the mandate to revise this outdated guidance document. After an access-to-documents request we discovered that the background scientific work, which EFSA had commissioned to Wageningen University (WUR), gives priority to the protection of agriculture rather than biodiversity. We carried out a review on the scientific literature on the impacts of pesticides on insects and other arthropods and found that if we continue with the current agricultural model, the ecological consequences can be devastating, including for the future of farming.

Quote and picture?: "It would be extremely sad if our children can no longer enjoy fluttering butterflies or humming bumblebees in the fields. But there is more: fertile soil and crop pollination depend on these little creatures, so the future of our farmers and our food security is at stake"

Report: [Licence to Kill - an EU guideline with far-reaching consequences](#)

Video from: [EU: protect the unsung heroes of our ecosystems - arthropods](#)



Towards a ban on the export of EU-banned pesticides

The European Commission did not deliver its promise to present measures to halt the export of EU-banned pesticides. The export of these harmful chemicals has devastating impacts on human health, water resources and biodiversity in the Global South. These dangerous chemicals return to the EU as residues in imported food, exposing consumers to potential health risks. Since EU farmers are not allowed to use these products, it creates an unfair competitive disadvantage. Europe imports food grown with the very pesticides it has banned - these food products may be cheaper but come with significant health and environmental costs.

With a coalition of NGOs, we commissioned a report about the economic benefits of an export ban. It shows that the actual costs to companies will be minimal. As the institutional cycle was coming to an end, we worked in a coalition with the Global South and sent a letter to all governments across the EU, emphasising that "Every Life counts". Once the new Parliament was installed, we sent a letter to welcome the MEPs and urge them to keep this issue high on the political agenda. Finally, we carried out an analysis on residues of EU-banned pesticides in European food.

Quote and picture:

Angeliki Lysimachou, head of Science and Policy at PAN Europe, concludes:

"Pesticides deemed too toxic for use here are too toxic for use everywhere. Protecting public health and biodiversity, both within and beyond Europe, must take precedence over trade and industry profits."



Reports: [Double standards, double risk. Banned pesticides in Europe food supply](#)
[EU pesticides export ban: what could be the consequences?](#)

Campaign: [Stop export of EU banned pesticides](#)

Save our brain

Pesticides can have very serious and lasting effects on our brain. Some can harm the developing brains of young children, while others can lead to chronic conditions such as Parkinson's disease. It is therefore completely incomprehensible that pesticides are not systematically tested for their long-term effect on brain and nervous system before being authorised for use. We advocate for a thorough re-assessment of all pesticides currently approved in the EU for chronic neurotoxic potential and a swift ban of all substances that show any signs of neurotoxicity according to public scientific literature.

Read more: [Neurotoxic pesticides affect children's brain: global restrictions urgently needed!](#)

Campaign: [Save our brain](#)



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