

Brussels, 8 July 2024

Madam Ursula von der Leyen, President of the European Commission  
Madam Ilze Juhansone, Secretary-General of the European Commission  
European Commission  
Brussels,  
Belgium

**Subject: Keep DG SANTE's lead for EU pesticide regulation**

Dear President of the European Commission, dear Ursula von der Leyen,  
Dear Secretary-General of the European Commission, dear Ilze Juhansone,

Information from the press indicates that the European Commission is considering moving the competency over pesticide files and responsibilities from DG SANTE to another DG. We, the undersigned organisations working to protect citizens and biodiversity from the harmful effects of pesticides, would like to express our serious concern regarding these media reports.

In the framework of the Union's One Health approach, removing the competence on pesticides from DG SANTE would contradict the evolution of science, showing that human, animal, plant and environmental health are intrinsically linked and interdependent. The One Health approach is embraced by the European Commission<sup>1</sup> and no less than five EU Scientific Agencies<sup>2</sup>, as well as by the World Health Organisation<sup>3</sup>. New scientific knowledge is published daily on the negative impacts of pesticides on human health and the environment. This is underlined in a report from the European Environment Agency<sup>4</sup>. In addition, EU legislation, as well as the case law from the Court of Justice of the EU, foresee that the management of pesticides and their safety assessment is a "health and environment" issue.

The Pesticide Regulation (EC) 1107/2009 aims at ensuring a high level of protection of human and animal health, as well as the environment against pesticides. The regulation is also underpinned by the precautionary principle to ensure such safety. The case law of the Court of Justice of the EU underlined on several occasions that the protection of health and the

---

<sup>1</sup> [https://health.ec.europa.eu/one-health\\_en](https://health.ec.europa.eu/one-health_en)

<sup>2</sup> <https://www.efsa.europa.eu/en/news/one-health-joint-framework-action-published-five-eu-agencies>: the European Centre for Disease Prevention and Control (ECDC), the European Chemicals Agency (ECHA), the European Environment Agency (EEA), the European Food Safety Authority (EFSA), and the European Medicines Agency (EMA)

<sup>3</sup> <https://www.who.int/teams/one-health-initiative>

<sup>4</sup> <https://www.eea.europa.eu/publications/how-pesticides-impact-human-health>

environment takes precedence over the intended improvement of crop yields via the use of pesticides<sup>5</sup>.

EU citizens are regularly expressing their concern about the impact of pesticides on their health and the environment. Two (out of only 11) successful European Citizens Initiatives<sup>6</sup> (ECIs) ask for a phasing out of synthetic pesticides. The Conference for the Future of Europe<sup>7</sup> also concluded that citizens demand a significant reduction in pesticide use. EU food Eurobarometers<sup>8,9,10,11</sup> conclude every year that the presence of pesticides in food is a source of concern for citizens, while a recent IPSOS poll<sup>12</sup> carried out in six EU countries concluded that a vast majority of citizens (~80%) are concerned by the impact of pesticides on their health and the environment.

At a decisive moment for the future of the EU, where citizens express their concerns for their future and that of their children, it is of major importance that the European Commission's actions are in line with science, with the law, as well as with citizens' demands. Taking decisions that go against these principles would harm the reputation of the European Commission, and disappoint citizens who often feel that business takes priority over their universal rights, including the right to health and the right to a clean and healthy environment. For these reasons, it is essential that the management of pesticides is maintained in DG SANTE, or transferred to DG ENV, jointly with additional resources.

We thank you in advance for your consideration.

Respectfully yours,

Dr. Martin Dermine, executive director, PAN Europe

[martin@pan-europe.info](mailto:martin@pan-europe.info)

+32 486 32 99 92

On behalf of

1. Agroecology Europe, Lili Balogh
2. AGROLINK Association, Svetla Nikolova
3. Alliance for Cancer Prevention, Helen Lynn
4. An Cláíomh Glas, Justin Byrne
5. An Taisce - The National Trust for Ireland, Dr. Elaine McGoff
6. BeeLife European Beekeeping Coordination, Lars Hellander
7. BirdLife Europe and Central Asia, Marilda Dhaskali

---

<sup>5</sup> Among others, see case C-162/21, §48.

<sup>6</sup> *Stop Glyphosate* ECI [https://citizens-initiative.europa.eu/initiatives/details/2017/000002/ban-glyphosate-and-protect-people-and-environment-toxic-pesticides\\_en](https://citizens-initiative.europa.eu/initiatives/details/2017/000002/ban-glyphosate-and-protect-people-and-environment-toxic-pesticides_en)

*Save Bees and Farmers* ECI [www.savebeesandfarmers.eu](http://www.savebeesandfarmers.eu)

<sup>7</sup> <https://www.europarl.europa.eu/resources/library/media/20220509RES29121/20220509RES29121.pdf>

<sup>8</sup> <https://www.efsa.europa.eu/en/corporate/pub/eurobarometer19>

<sup>9</sup> [https://www.efsa.europa.eu/sites/default/files/2022-09/EB97.2-food-safety-in-the-EU\\_report.pdf](https://www.efsa.europa.eu/sites/default/files/2022-09/EB97.2-food-safety-in-the-EU_report.pdf)

<sup>10</sup> <https://europa.eu/eurobarometer/surveys/detail/2241>

<sup>11</sup> <https://europa.eu/eurobarometer/surveys/detail/3173?s=03>

<sup>12</sup> <https://www.pan-europe.info/resources/reports/2023/10/pesticides-play-it-safe>

8. Bond Beter Leefmilieu, Heleen De Smet
9. Buchinger Wilhelmi Clinics and King's College London, Dr. Robin Mesnage
10. CEEweb for Biodiversity, Csaba Mezei
11. Center for International Environmental Law (CIEL), Urszula Grycuk
12. Changing Markets Foundation, Nusa Urbancic
13. CHEM Trust, Dr Michael Warhurst
14. Child Rights International Network, Suzanne Astic
15. ClientEarth, Anaïs Berthier
16. Coalition Living Earth, Anna Kucińska
17. Corporate Europe Observatory, Nina Holland
18. De Landgenoten, Petra Tas
19. DISTAL Università di Bologna, Claudio Porrini
20. Dryade, Dries Verhaeghe
21. Earth Thrive, Zoe Lujic
22. Eco Hvar, Vivian Grisogono
23. Ecologistas en Acción, Kistine García
24. Eco-TIRAS International Association of River Keepers, Ilya Trombitsky
25. Ekō, Eoin Dubsy
26. Environmental Law Ireland, Attracta Uí Bhroin
27. European Environmental Bureau, Faustine Bas-Defossez
28. European Professional Beekeepers Association, Bernhard Heuvel
29. Fédération SEPANSO Aquitaine, Georges Cingal
30. Federazione Nazionale Pro Natura, Franco Rainini
31. Foodwatch International, Jörg Rohwedder
32. Friends of the Earth Europe, Jagoda Munic
33. Friends of the Irish Environment, Caroline Lewis
34. Fundatia ADEPT Transilvania, Nathaniel Page
35. Générations Futures, Maria Pelletier
36. German League for Nature, Animal and Environment Protection (DNR), Florian Schöne
37. GLOBAL 2000 - FOE Austria, Helmut Burtscher-Schaden
38. GMWatch, Claire Robinson,
39. Green Impact, Gaia Angelini
40. Green Transition Denmark, Christian Ege Joergensen
41. Health and Environment Alliance (HEAL), Genon K. Jensen
42. Health Care Without Harm (HCWH) Europe, Arianna Gamba
43. Hogar sin Tóxicos, Carlos de Prada
44. International Society of Doctors for Environment, Francesco Romizi
45. King's College London, Pr. Michael Antoniou
46. Landgenoten Belgium, Petra Tas
47. Latvian Fund for Nature, Andrejs Briedis
48. Latvian Permaculture Association, Ilze Mezniece
49. Medical School University of Athens, Polyxeni Nicolopoulou Stamati
50. Mouvement Ecologique, Blanche Weber
51. National Society of Conservationists - Friends of the Earth Hungary, Ákos Éger
52. Nature & Progrès Belgium, Virginie Pissort
53. Natuurmonumenten, Patrick Nuvelstijn
54. Ökobüro, Marlene Schaffers
55. PAN Germany, Gabriela Strobel
56. Parkinson Vereniging, Nickie van der Wulp
57. Parkinson's Europe, Adrien Moyroud
58. Pesticides Action Network Italy, Fabio Taffetani

59. Pesticide Action Network Netherlands, Margriet Mantingh
60. Polish Ecological Club, Maria Staniszewska
61. Quercus, Dr. Alexandra Azevedo
62. Réseau Environnement Santé, André Cicoella
63. ROMAPIS Romania, Constantin Dobrescu
64. Secrets Toxiques, Philippe Piard & Dominique Masset
65. Suomen luonnonsuojeluliitto, Tapani Veistola
66. Terre d'Abeilles, Béatrice Robrolle
67. The Cancer Prevention & Education Society, Jamie Page
68. The Danish Society for Nature Conservation, Rikke Lundsgaard
69. The Environmental Forum, Bernadette Connolly
70. The Organic Centre, Stephen Campbell
71. Umweltinstitut München e.V., Fabian Holzheid,
72. Università di Bologna, Stefano Main
73. Veblen Institute, Mathilde Dupré
74. Velt, Stijn Overloop
75. Via Pontica Foundation, Ina Agafonova
76. Voedsel Anders Vlaanderen, Ingrid Pauwels
77. WeMove Europe, Mika Leandro
78. West-Vlaamse Milieufederatie, Bart Vanwildemeersch
79. Women Engage for a Common Future (WECF) International, Sascha Gabizon
80. Youth and Environment Europe, Pegah Moulana
81. Zero Waste Alliance Ireland, Orla Coutin Fitzsimons
82. ZERO, Portugal, Francisco Ferreira