PARLEMENT & WETENSCHAP

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Scientist's impact assessment of EU-proposal

Food and animal safety simplification package (focused on plant protection products)

Academics: Professor Martina Vijver (Leiden University), Professor Nico van den Brink, Dr Edwin Alblas LLM (both Wageningen University & Research)
Rapporteurs House of Representatives: Maarten Goudzwaard (JA21), Renate den Hollander (VVD), Anne-Marijke Podt (D66)
EU advisor: standing committee on Agriculture, Fisheries, Food Security and Nature
Documents assessed: COM (2025) 1030 Final, COM (2025) 1020 Final

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Part 1: aspects from the EU impact assessment (to be completed by EU advisor)

No.	Question	Information from the EU impact assessment
1.	**Problem definition and need for proposal** - What problem does the EU want to solve? - Who are affected by the problem? - Why does the European Commission feel that EU legislation is needed?	Impact assessment lacking (According to the European Commission, the urgency of the proposals leaves no room for such a test) For the proposal on maximum residue limits, an IA is expected in summer 2026[1]. This will examine the impact on EU competitiveness and the international implications.
2.	**Objective** What is the objective of the EU proposal?	See point 1
3.	**Policy options** - What policy options has the EC considered? - Why was this policy option chosen? - What are the expected impacts (i.e. social, economic, environmental, etc.) of the chosen policy option?	See point 1
4.	**Monitoring and evaluation** How will the effects be monitored and evaluated?	See point 1

[1] European Commission, Daily News 25 / 11 / 2025

Part 2: Impact EU proposal on the Netherlands (column 1 to be filled in by EU advisor, right column to be filled in by academics)

No.	Topic	Cabinet assessment in BNC fiche	Observations & recommendations academics
1.	**General observations**	N/A	**General findings** We conclude that the proposals as presented will not achieve the stated objectives. We **do not** see that the legislation and regulations will simplify **or** that the plans will reduce administrative burdens. The plans will **not lead to a level playing field** and will **not accelerate innovations and authorisations**. Finally, our assessment is that the plans **will not lead to better protection** of people and the environment from adverse effects of pesticide use. The Omnibus proposals will, however, result in **a transition of the burden of proof** to prove the safety of active substances from producers to other actors - whereas it is not clear who will now carry such responsibility. In addition, it is unclear in the proposal where and how concerns about the safety of active substances can be raised. The European Commission chose not to carry out an *impact assessment* to assess the effectiveness of the proposals. There **is no further substantiation** as to whether the desired simplification of legislation and regulations and acceleration of authorisation **will** actually **be achieved** (see point 4). **<u>Findings per set objective</u>** **Simplify legislation and regulations, accelerated authorisation and risk-based review.** As a solution to reduce work pressure in order to speed up processes, the European Commission proposes dropping mandatory periodic review of resources. It proposes authorisation for an indefinite duration (without periodic review), combined with the possibility of risk-based review of all substances. However, much is unclear about how the plans are fleshed out; what criteria are applied and who gets what mandate in decision-making. The process for starting a risk-based review of old substances has not been clearly described, criteria have not been set and no body has been identified as responsible. As such, it is not clear how the proposed work programmes can meet the objective of a risk-based review. This applies to re-evaluations of products (national) and active substances (EU EFSA). It is therefore not clear whether the present plans will lead to regulatory simplification, reduced work pressure and accelerated authorisation. **Level playing field and innovativeness.** The proposals assess new substances based on the latest scientific knowledge. In contrast,

			substances already approved will not be reviewed and will continue to be approved on the basis of old, usually less stringent criteria. This creates an uneven playing field between approved and new substances. This will inhibit innovation of new substances and authorisation of potentially safer pesticides. **Human protection and environment** If the periodic re-evaluation is abolished, there is a good chance that substances that have harmful effects on the environment and health in the case of long-term exposure will remain on the market. Indeed, the risk assessment of substances before they reach the market appears insufficient to properly predict long-term effects (point 2). For example, the methods used often underestimate the effects of substances on the nervous and immune systems of both humans and animals. Moreover, it has repeatedly been shown that sensitivities of animals to substances in laboratory studies differ from those in practice, because ecosystems and human health are determined by complex and long-term, subtle interactions on which substances, even at low concentrations, can have an effect. This change therefore poses significant risks to sustainability and to the level of protection of human and environmental health. **Burden of proof.** It is important to realise that if the proposals for risk-based reviews are implemented, the burden of proof will be shifted from substance producers to governments or other parties (to whom is not clear). In a **review**, it is then **no longer the producer** who must demonstrate that substances **are** safe, but **others** who need to demonstrate that substances are **not** safe. **This is against the precautionary principle, embedded in the current system, and thus a fundamentally different approach.** In addition, the evaluation will have a political dynamic because Member States will have to request a review through EFSA, see example 1 in the appendix. **Accelerated authorisation Biocontrols.** With the proposal, the European Commission wants to speed up the authorisation of so-called biocontrols (see appendix for the definition of biocontrols used here), and bases this on past success with authorisation procedures for micro-organisms. This is a good starting point, but not well elaborated in these plans. We make recommendations for this below. **<u>Recommendations</u>:** • **Maintain periodic review for all substances.** Smarter testing can reduce work pressure (see point 3). • **Maintain the precautionary principle of the current system.** Burden of proof should remain with producers, the precautionary

			principle of the current legislation and regulations should remain guiding. • **Use '*Green lanes*' for biocontrols.** Developing so-called 'green lanes' for biocontrols allows assessments to be made for the specific classes of biocontrols. The prerequisite is that a classification of biocontrols (see appendix) and associated specific assessment pathways is developed for the different classifications (see point 3). • **Do not allow extension of 'Grace periods'.** Extending *grace periods* (point 4) will lead to longer use of pesticides with unacceptable risks while it has not been made clear whether the problem of emergency authorisations is solved.
2.	**Effectiveness and efficiency** - In what way and to what extent is the EU proposal expected to contribute to the intended performance and effects in the Netherlands? - Why is the EU proposal an effective way to achieve the intended performance and effects in the Netherlands? For example: - Objective: Is the objective sufficiently clear? - Policy options: What are advantages/disadvantages of the proposed option? - Are there certain external factors standing in the way of achieving the target in the Netherlands? - Are there more effective and/or more efficient alternatives that could also have been considered and be (more) relevant for the Netherlands? - Are there any additional impacts (positive or negative)? - What is the so-called 'cost of inaction', the cost of not taking measures?	Objective: The package is part of a wider series of Omnibus proposals designed to **simplify** European legislation and regulations. The government supports simplification, acceleration and harmonisation of European regulations, as long as they contribute to innovation, sustainability and a level playing field, and the level of protection for humans, animals and the environment is maintained (page 6, 4th paragraph BNV document). The contribution of NL to the objective is - to accelerate market authorisation of plant protection products and application of biocontrol and low-risk active substances (page 6, last paragraph BNV document). - Harmonisation of legislation within the EU on MRLs (maximum residue level), feed additives, animal welfare, hygiene regulations, migration testing for plastics and GMO-related legislation (page 7, 3 paragraph BNV document) The above points are in line with existing Dutch policy programmes such as the implementation programme of the Future Vision Crop Protection 2030 (page 6, last paragraph BNV document)	It is highly uncertain and unclear whether the proposals will lead to the stated objectives. **Accelerated market authorisation biocontrols:** The current proposals do not specify how biocontrols should be assessed. There are no good criteria for what biocontrols are (too broadly worded definition in Article 3). In our view, classification of substances is necessary to enable authorisation through specific assessment processes. Once that is elaborated, there is a greater chance of simplifying assessments, speeding them up over time and thus reducing burdens. In doing so, it will be possible to target acceleration of the desired market authorisation of biocontrols and innovation can be encouraged. **Risk-based review of substances:** **Sustainability/level of protection**: during authorisation, substances (EU) and pesticide products (national) were assessed based on insights from experiments and modelling. After using pesticides, the real risks to humans and ecosystems often only become apparent in the field (see example 2 Appendix). It is essential to monitor risks after authorisation to identify ecosystem/health risks (Vijver et al. 2017), especially when abandoning regular periodic reviews. There is no elaboration of the so-called work programmes that could lead to a thorough risk-based review (no criteria, no mandate holder, no procedure, no proposal for risk monitoring of pesticides, among others with regard to **burden of proof**). Above all, it is unclear when a review can indeed be triggered, and by/with which authority. It is hereby very uncertain whether such a risk-based approach is sustainable and provides sufficient protection. **Sustainability** of pesticide use benefits more from specific assessment pathways for different classifications of pesticides (see point 1). This

			would speed up authorisations and use capacity more efficiently, while ensuring better sustainability and safety (partly due to better expertise and speed). **Innovation/level playing field**: authorisation of substances for an indefinite duration results in new substances on the market being assessed against new criteria (based on the latest scientific insights), but not old substances. These new criteria are usually more stringent, meaning that substances which could in principle be better than existing ones may still not be approved. This creates an **unequal playing field and inhibits innovation**. In contrast, a regular review of existing authorisations based on the latest scientific and technical knowledge ensures a level playing field and encourages innovation. **Work pressure**: it is not clear what the criteria are for considering a risk-based review of a specific substance/agent and which parties play a role in this (see point 1). Such a consideration involves many different parties with strong interests. It is possible that such a consideration will require considerable capacity in the start-up phase of a risk-based review (long decision paths), capacity that can no longer be spent on review itself. Where reviews are concerned, this makes it at least questionable whether the plans will lead to reduced work pressure.
3.	**Consequences for parties** - Which parties in the Netherlands are affected by the EU proposal? These include implementing organisations, local and regional authorities, citizens and businesses and any other stakeholders. - What are the consequences of the EU proposal for these parties? Consider financial implications, capacity utilisation, administrative burden/regulatory burden, implementation costs.	According to the Commission, the amendments to regulation (EC) no. 1107/2009 should lead to substantial reductions in administrative burdens and costs for **industry**, in particular for applicants of plant protection products. In particular, **SMEs** operating in biocontrols and low-risk products should benefit (p 15, last paragraph BNV document). For **citizens**, the Commission does not expect any direct financial burden or additional regulatory burden for these changes (p 16, 1st paragraph BNC fiche). The Commission indicates in its proposals that no direct financial impact on **Member States** is envisaged (p 15, 1st paragraph BNC fiche). For regulation (EC) 1107/2009 and regulation (EU) no. 528/2012, the government expects that additional funding for the **Board for the Authorisation of Plant Protection Products and Biocides** (Ctgb) will be required from central government (p 15, 2nd paragraph BNC fiche).	The expected impacts can be summarised as follows. **Accelerated market authorisation biocontrols:** • **Industry and SMEs**: simplifying and accelerating authorisation would potentially lead to a burden reduction for these parties and faster authorisation to markets (see '**biocontrols'** in point 2). • **Farmers/users**: in the current proposals, it is not clear what can be counted as biocontrols, which does not speed up their availability. Making Dutch agriculture more sustainable can be accelerated by making alternative, innovative methods more marketable by classifying substances first and then assessing them specifically (see point 2). • **Assessment bodies:** the proposal to remove registration of use of biocontrols by farmers is a risk for assessment bodies. If a biocontrol does not turn out to be as safe as initially assumed, reconstruction of (historical) use is likely to be needed, as well as monitoring, which may require considerable capacity. Nor is it clear which authority has which mandate (NVWA, Ctgb, Water Board, local authorities). This can lead to shifting responsibility and failure to take necessary action.

			Risk-based review of substances: • **Assessment bodies**: based on the current proposals, it is not clear what the expected capacity needs are for the various bodies. If a periodic review is no longer carried out, it is unclear where the various stakeholders (see point above 'Assessment bodies') can report concerns and findings regarding impacts and risks (incl. passing on costs). The Ctgb will again have to apply for review of substances through the EU, with all Member States voting once. Thus, the call to reassess resources becomes a political decision (see also under point 4, and example 1 appendix). • **Mandate:** it is unclear which body is responsible for taking action when unforeseen risks and effects are identified in the use of substances after authorisation.
4.	**Social consequences** - What are the social consequences of the EU proposal in the Netherlands? Consider the impact on the Dutch climate and living environment, competitiveness, business climate, labour market - employers & employees, well-being, long-term consequences?	The package could have various social impacts on the Netherlands, especially on the living environment, economy and competitiveness. **Faster** authorisation procedures can contribute to **more sustainable** agriculture and **improved environmental quality**, provided safety assessment remains careful (p 15-16, BNV document) In addition, the proposal could have positive economic effects for the **business community**. The European Commission expects adjustments in the regulations for plant protection products to lead to a significant **reduction in administrative burdens** (p 15, 3rd paragraph BNV document). For example, a risk-based review system is estimated to save about €49.6 million a year for regular substances and €6.5 million for biocontrol substances (p 15, last paragraph BNV document). Cost savings are also expected in other sectors, e.g. around €71.5 million a year from amendments to the biocides regulation and around €221 million from adjustments to the regulations for feed additives (idem) The proposals could also strengthen the EU's **business environment and competitiveness**. Simplifying regulations and speeding up procedures will make it more attractive for companies to locate and market products in the EU (p 16, last paragraph BNV document). For the Netherlands, with a strong agri-food sector and logistics position, this could bring economic benefits. At the same time, it remains important that potential risks, such as animal diseases or negative environmental impacts, are properly managed (p 15, 4th paragraph BNV document).	• The European Commission chose not to carry out an *impact assessment,* whereby the effectiveness of measures has not been elaborated. This raises the question whether the objectives set can really be achieved while maintaining public and environmental health. And also whether they do not violate the precautionary principle (see example 5 appendix). The proposals also lack clear criteria and descriptions of procedures that can help make a clear *impact assessment*. Furthermore, we foresee the following: **Accelerated market authorisation of biocontrols:** without clear classification criteria, review through specific green lanes is not possible. This will require the development of a specific framework to enable accelerated authorisation of different types of biocontrols (see also point 2). **Risk-based review of substances:** • **Sustainability** In our opinion, the proposals will not lead to the desired improvements in terms of sustainability and protection of people and the environment. New active substances would be assessed against new criteria, authorized substances would not. This creates a skewed playing field, which can inhibit innovation (see 'Innovation' point 2). In addition, there is currently a large backlog in the review of substances, which is highly undesirable. However, this is mainly a result of lack of resources and capacity in assessment bodies. This can be addressed by, among other things, broadening capacity at the assessing organisation and better use of technological innovation. It is also doubtful whether the proposed

			plans for risk-based reviews guarantee the same protection of people and the environment (see section 2). Better guidance of specific assessments based on proper classification of substances and biocontrols could address both (see section 1). • **Simplification of authorisation** The proposals drop the periodic review of substances at EU level, but this will remain at member state level. This ensures that the current, logical flow (review of active substances by the EU, followed by assessment of products to be used by Member States), is abandoned. The plans may result in individual member regularly assessing products, which in the case of a negative assessment may lead to a review of the active substance (from the product) by EFSA. In turn, this may be followed by reviews of products containing the active substance in question in other Member States. This certainly does not simplify admissions or the administrative burdens. • **Extension 'grace period'.** This measure is seen as a solution for emergency authorisation of pesticides. However, this has not been substantiated. Extended use still releases the (now no longer approved) substances into the environment. This leads to unacceptable risks (otherwise the substance would have been approved). For active substances under Article 4(7) (active substances approved for urgent reasons, even if they do not meet the normal approval criteria), the preparation of a phasing-out plan is no longer considered necessary by the European Commission. This is because such authorisation would only be valid for five years. Without such a 'phasing out' plan, however, it is not clear how the emergency situation improves and how use of the risky substances can be terminated. Such emergency authorisations can take a very long time if plans are not made to control pests in other ways. (Example 3 in the appendix)
5.	**Relationship to Dutch policy plans** - How does the EU proposal relate to existing Dutch policy and legislation and any national policy intentions? Consider the following aspects: what are possible conflicts between Dutch policy and the EU proposal, or how can the EU proposal strengthen Dutch policy.	The package largely aligns with existing Dutch policies on agriculture, food safety and animal health, but does have implications for national legislation and regulations. In several areas, the Netherlands will have to amend its national legislation and regulations to bring them into line with the amended European rules. The proposed amendments to Regulation (EC) No 1107/2009 thus include further harmonisation measures, for example for mutual recognition of plant protection products and data protection. This will limit national policy leeway and the Netherlands will have to adjust its implementing regulations and policy rules, especially with regard to biocontrol and low-risk substances (p 17, 4th paragraph BNV document).	We foresee conflicts between current legislation and regulations and the Omnibus proposal, specifically because there are no guarantees that accelerated authorisation of biocontrols will actually take place, and that abandoning periodic reviews will not lead to a reduced level of protection of humans and ecosystems (Example 5 Appendix). For example: **Water Framework Directive**: Dutch surface waters, including those in nature reserves, are already struggling with high concentrations of pesticides and their effects on aquatic organisms (www.bestrijdingsmiddelenatlas.nl (refs: Bruhl et al (2021) on Germany, Meten=Weten (2025)). The Omnibus proposal does not provide for monitoring of ecological effects in post-authorisation

		An important change for national legislation is the introduction of tacit consent (lex silencio positivo) in the mutual recognition of plant protection products containing only biocontrol or low-risk substances. If a member state does not decide within the set deadline, the authorisation will be granted automatically. This application of the lex silencio positivo follows directly from Union law, so the Netherlands cannot deviate from it nationally. This may limit national discretion, but at the same time may speed up procedures and facilitate the authorisation of innovative means (p 17, 5th paragraph BNV document). At the same time, the EU proposal could strengthen Dutch policy. The proposal contains several competencies for the European Commission to adopt detailed regulations through delegated and implementing acts. According to the government, this is desirable because it contributes to flexibility, faster decision-making and uniform application of rules within the EU (p 18, 3rd paragraph and p 19, 1st paragraph BNV document). Accelerating market authorisation of plant protection products and application of biocontrol and low-risk active substances (page 6, last paragraph BNV document) is in line with existing Dutch policy programmes such as the implementing programme of the Future Vision Crop Protection 2030 (page 6, last paragraph BNV document).	use, which could continue to increase harmful pressure. The same applies to the **Habitats Directive** and the **Nature Restoration Regulation**. **Human health**: the SPRINT consortium has shown that residues are found in urine, among other things, so exposure has occurred. Blood from pregnant women also contained pesticides (ref: Braun et al 2024). A reduced level of protection by abandoning periodic review, among other things, clashes with the constitutional task: safeguarding public health and the environment. **Lex silencio positivo**[2]: applying this could lead to substances not being assessed in the right timeframe and thus risks not being noticed and addressed in time. The result is that a substance is automatically approved, without assessment, and substances that may not be optimal/safe for use in the Netherlands (even if this is limited to biocontrols and low-risk substances) have to be approved on a regular basis.
6.	**Feasibility** - Which implementing organisations, local authorities and regulators will be affected by the EU proposal? - What is the potential impact regarding the implementation of the EU proposal in the Netherlands for implementing organisations, local authorities and regulators? Consider: where might potential problems arise in the implementation of this EU proposal? For example, in terms of the knowledge, capacity, financial resources, organisation, substantive strategy, etc. needed to implement the EU proposal.	The EU proposal affects several implementing organisations and regulators in the Netherlands, in particular the **Board for the Authorisation of Plant Protection Products and Biocides (Ctgb)**, the **Dutch Food and Consumer Product Safety Authority (NVWA)**, **Statistics Netherlands (CBS)** and the **Water Boards** (p 21, 1st paragraph and p 22, 3rd paragraph BNV document) For the Ctgb, the proposal may have an impact on feasibility. The proposed amendments risk requiring national authorities to reassess information on active substances instead of a single European assessment being sufficient. This requires several Member States to assess the same substance information, which can lead to longer assessment procedures, higher costs and an increased workload for the Ctgb (p 21, 1st paragraph BNV document). In addition, the proposal could lead to fluctuations in workload, making it more difficult to maintain a stable team of experts with specialist knowledge (p 21, 2nd paragraph BNV document). Also, the proposed 120-day decision period for certain biocontrols is seen as unrealistic, because not all nationally specific aspects, such as water protection, can be adequately assessed within that period (p 21, 3rd paragraph BNV document).	**Capacity**: sufficient capacity is needed for good feasibility. The proposals necessitate capacity expansion, which is contrary to the stated aims of the proposals (example 5 in the appendix). **Accelerating market authorisation of biocontrols**: for improved feasibility of substance authorisation, specifically biocontrols, speeding up processes is essential. These proposals will potentially lead to more complex procedures, for example, because periodic retests have been abolished at EU level while they can still be carried out at member state level. It is not clear how this works between Member States and EU and between the Member States themselves. **Risk-based review:** for proper implementation of risk-based assessment, an underlying programme of, among others, monitoring of real risks is essential. Ensuring that relevant risks are actually picked up requires a major effort and associated finances. Ad hoc work programmes as proposed are not sufficient for this purpose because they do not focus on unknown risks. It is not clear who is responsible for this, and who has the mandate to decide. This cannot be a role for science. That will be able to show risks as a possible by-product of research, but it is not tasked with monitoring substance use risks.

2 See: https://nl.wikipedia.org/wiki/Lex_silencio_positivo

		For regulators such as the NVWA and the Water Boards, the proposal may lead to additional supervisory tasks, for example due to a tightened definition of treated stock material and adjustments in administrative processes and labelling in the chain (P 22, 3rd paragraph BNV document). At the same time, the expiry of the registration obligation for professional users of organic plant protection products may lead to regulators having less insight into the use of these products, which may complicate supervision (Ibid.) In addition, CBS may be affected because the loss of registration data may require additional data collection for statistics on the use of plant protection products, which may cause additional implementation burdens (Ibid.).	**Local authorities:** for years, water bodies have experienced that they do not always meet the environmental quality standards of pesticides in their water. With the proposed changes for the risk-based review, provinces, Water Boards, municipal councils and environmental services may be given a bigger role in identifying and putting pesticide risks in post-authorisation use on the agenda. However, the division of tasks and work processes are not clear here. It is also unclear who bears responsibility for this. This can lead to risks not being identified in time and appropriate action not being taken. Local authorities have recently received a handbook on how to deal with pesticides in the environment (ref: De Vries and Nuijen, 2026), but only a few regions have experience with this. Uncertainties in pesticide authorisation and assessment can frustrate participation processes at local and regional level, which can pit participants against each other (polarisation).
7.	**Feasibility** - To what extent and in what timeframe is the policy goal of the EU proposal feasible in the Dutch context?	The proposed amendments will enter into force 20 days after publication in the Official Journal of the European Union, and will be directly applicable from that moment. Transposition time is provided for Directives No. 98/58, No. 2009/128 and No. 82/711. The amendments to Regulation (EC) No. 1107/2009 and Regulation (EC) No. 999/2001 will require additional time to comply with the amended regulations. The government will draw attention to this during the negotiations (p 20, 3rd paragraph BNV document)	**Time frame.** Given the high impact of the proposals, it is to be expected that an extensive time frame will be needed to implement them. In particular, the transition from periodic to risk-based review requires clarification of procedures, criteria, competent authority and need to involve stakeholders, but certainly also the development of a systematic approach to post-authorisation risk monitoring. The fact that the producer's burden of proof transfers to another party (not clear who) is important here. **Capacity.** We endorse the conclusion from the BNV document that additional time is needed, but add that the change will also require (temporarily) more capacity for implementation, especially among implementing agencies (see example 4 in the appendix)

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Appendix Case examples (NB: these are case histories and not comprehensive):

Example 1) Re. 5. In accordance with Article 21 of EU regulation 1107/2009, the Commission can now also review an active substance, for example in response to new scientific and technical knowledge. The Omnibus makes this exception article the general modus operandi. It appears that despite reports since 2020 about more new scientific studies on flupyradifurone and the request to review this substance, this has still not happened. In addition, in July and October 2025, three Member States requested review under Article 21 of six active PFAS substances, following the Danish study showing that these substances break down into TFA and enter groundwater. Nevertheless, the Commission considers that this procedure would have 'limited value' at this stage and refuses to include this new study, available since December 2024, in the investigation of the substances concerned. This shows that the political nature of this work method and the sidelining of science again leads to delays and does not speed up the review of hazardous substances. The same applies to the bentazon problem in groundwater which has been a problem for years (and still is in some regions) while it has long been a problem at drinking water abstraction points.

Example 2) Example of that prospective estimation does not always go well and thus needs retrospective verification: Neonicotinoids were initially considered more environmentally friendly because they seemed more selective: they are highly toxic to insects but less acutely toxic to mammals and other vertebrates than previously approved insecticides such as organophosphates. In addition, they could be applied systemically (e.g. via seed coating), reducing the need for spraying, meaning that environmental exposure was estimated to be lower. They were also thought to have a lower impact on non-target organisms and were therefore a safer alternative. (ref: Thompson et al. 2020) However, later research showed that these substances are persistent and mobile in soil and water, spreading widely in the environment. Because they are systemic, they also get into nectar and pollen, which is harmful to pollinators such as bees. Moreover, even at low concentrations, they are found to be toxic to many non-target organisms, such as aquatic insects and other species. This showed that their overall ecological impact is greater than initially thought and thus not as environmentally friendly as first assumed after all (ref: Vijver et al. 2017).

Example 3) For more than 10 years, in the case of control of the Suzuki fly in orchards, an emergency annual authorisation has been granted for the products Exirel or Tracer, which were in principle no longer approved. In the meantime, however, the area under cherry cultivation almost tripled between 2000 and 2024 (ref: CBS, 2024) and there are structural compliance problems (ref: NVWA, 2024).

Example 4) In a 2020 evaluation, the European Commission itself identified some of the causes of delays in the (re)assessment of pesticides:

- Lack of resources and capacity in Member States (p.21), while the EC itself has indicated that with 50 experts (2 per member state) the capacity problems will be solved (EFSA in French court hearing 2023) and automation and streamlining of procedures can be looked at.
- Lack of accuracy and completeness in application files by manufacturers (p.7), which takes up capacity and encourages further delays.
- Disproportionate distribution among Member States of costs and workload for (re)assessing active substances.
- In a number of Member States, fees collected are insufficient to cover costs.
- In some Member States, fees collected are not allocated to the authorities in charge of carrying out the work (p.6).

Example 5) The European Ombudsman already concluded in previous Omnibus packages that the Commission does not comply with principles of good administration. According to a legal opinion, the Food and Feed Omnibus Safety package is also unlawful and potentially incompatible with the precautionary principle and the level of protection set out in EU law and Regulation 1107/2009. In addition, the package was arrived at without balanced consideration of interests. There was no public consultation and an impact assessment is missing, while significant societal impacts can be expected. In doing so, the proposal undermines the primary objective of Regulation 1107/2009, which is to ensure a high level of protection of human health and the environment from harmful pesticides. (ref: European Ombudsman 2025)

Definition Biocontrols: biocontrols are not well defined in the EC proposal. We adopted the following definition in our reflection: biocontrols are plant protection products of biological origin, both living and non-living. Living biocontrols include biological enemies of pest species or pathogenic microbial organisms. Non-living biocontrols are substances that may or may not be toxic, including plant extracts, semiochemicals (e.g. pheromones: odorous substances that repel or attract animals) but also so-called ds-RNA (genetic codes that can intervene species-specifically in the physiology of pest species).

References:

- Braun G, Herberth G, Krauss M, König M, Wojtysiak, Zenclussen A.C. & Escher B.I. (2024) Neurotoxic mixture effects of chemicals extracted from blood of pregnant women. Science 386 (6719) 301-309.
- Bruhl C.A., Bakanov N, Köthe S, Eichler L, Sorg M, Hörren T, Muhlethaler R, Meinel G & Lehmann G.U.C. (2021). Direct pesticide exposure of insects in nature conservation areas in Germany. Scientific Reports 11: (24144).
- De Vries A & Nuijen S. Gemeentelijke handleiding Regulering bestrijdingsmiddelen (2026).
- CBS 2024. https://www.cbs.nl/nl-nl/nieuws/2024/32/oppervlakte-kersenteelt-bijna-verdrievoudigd-sinds-2000 (checked on 20 April 2026)
- European Ombudsman 2025. https://www.ombudsman.europa.eu/en/press-release/en/215989 (checked on 20 April 2026)
- Meten = Weten (2025). Pesticiden op de Markerwadden (https://metenweten.nl/page/rapport-marker-wadden)
- NVWA. 2024. https://www.nvwa.nl/actueel/nieuws/2024/11/25/inspectieresultaten-minder-dan-de-helft-van-de-kersentelers-leeft-voorwaarden-vrijgestelde-gewasbeschermingsmiddelen-na.(Checked on April 2026)
- Thompson, Darrin A., Hans-Joachim Lehmler, Dana W. Kolpin, Michelle L. Hladik, John D. Vargo, Keith E. Schilling, Gregory H. LeFevre, Tonya L. Peeples, Matthew C. Poch, Lauren E. LaDuca, David M. Cwiertny and R. William Field (2020), A critical review on the potential impacts of neonicotinoid insecticide use: current knowledge of environmental fate, toxicity, and implications for human health. Environmental Sciences: Processes and Impacts, 22, 1315-1346
- Vijver M.G., Hunting E.R., Nederstigt T.A.P., Tamis W.L.M., Brink P.J. van den & Bodegom P.M. van (2017), Postregistration Monitoring of Pesticides is Urgently Required to Protect Ecosystems, *Environmental Toxicology and Chemistry* 36(4): 860-865.