



**Pesticide
Action
Network**
Europe

Brussels, 20 November 2023

To: EU ministers of agriculture, environment and health

Subject: European Commission proposal for a Regulation on the Sustainable Use of Plant Protection Products (SUR) - Link between exposure to pesticides and children's health, national pesticide reduction targets, sensitive areas

Dear Minister,

We are writing to you ahead of the next meeting of the Working Group on the Sustainable Use of Plant Protection Products Regulation (SUR) proposal to **ask you to protect the health of children by preserving a strong definition of Sensitive areas, the 50% binding national targets for pesticide reduction, and an immediate ban on the most hazardous pesticides.** The decisions made in shaping this future legislation will profoundly impact the health of our citizens, particularly that of our children and other vulnerable groups, and ecosystems mankind relies on.

1. Sensitive areas: the use of synthetic pesticides cannot be, by any means, allowed in Sensitive Areas. Even allowing the use of pesticides if citizens are denied access to the treated site does not protect citizens from pesticides - pesticides drift, and their residues stay in the environment and impact health and biodiversity. The definition should extend to sports grounds, cemeteries, roads, motorways and railroads margins, industrial ports, airports, industrial areas and overhead power line areas.

The [additional study](#) to the Impact assessment requested by the Council last December, published in July this year provided solutions, and examples of good practices of cities that successfully prohibited dangerous pesticides to protect the health of their citizens. We strongly encourage you to make use of such information in your decision-making process.

In addition, we want to stress that an adequate definition of sensitive areas is vitally important for protecting the health of children, as the most vulnerable members of our society who deserve special attention and protection. Pesticides have been linked to various health issues in children, ranging from developmental concerns to respiratory problems, as shown in our recent [webinar](#). A strong definition of sensitive areas, which includes areas where children live, play, and learn, is imperative for safeguarding their well-being. Therefore, we ask you to make sure that stringent protective measures are

included in the Council text.

2. We urge you to support and uphold national pesticide reduction targets of at least 50%. As stated in our previous letters of 11 October^{1,2,3}, scientific evidence consistently highlights the detrimental effects of synthetic pesticide use on biodiversity, soil health, and water quality. By setting reduction targets, you signal your commitment to take into account the will of citizens, towards a more sustainable and ecologically responsible agriculture. Indeed, citizens repeatedly ask for a strong reduction in pesticide use, as shown in a recent IPSOS [poll](#) on the public opinion on pesticide use in the EU, the [Save Bees and Farmers](#) ECI, [EU barometers](#) and the [Conference on the Future of Europe](#).
3. Lastly, we call on you to prohibit the more hazardous pesticides. Alternatives exist to this category of ~40 old and very toxic substances. The health and safety of citizens should be prioritised.

In conclusion, we urge you to stand firm in preserving a strong definition of sensitive areas, setting binding national pesticide reduction targets, and for the ban of more hazardous pesticides.

We appreciate your attention to this matter.

Yours sincerely,

Natalija Svrtan, Campaigner, Agriculture and Pesticide Free Towns, PAN Europe - natalija@pan-europe.info

Kristine De Schamphelaere, Policy Officer Agriculture, PAN Europe - kristine@pan-europe.info

¹https://commission.europa.eu/system/files/2023-01/SWD_2023_4_1_EN_document_travail_service_part1_v2.pdf

² [Guyomard, Bureau et al., 2020](#). Research for AGRI Committee – The Green Deal and the CAP: policy implications to adapt farming practices and to preserve the EU's natural resources.

³ <https://www.inrae.fr/actualites/biodiversite-services-rendus-nature-que-sait-limpact-pesticides>