

Mr. Pascal Canfin,
Chair of ENVI Committee of the European Parliament
Members of ENVI Committee of the European Parliament

Dear Mr. Canfin,
Dear Members of ENVI Committee,

On the 23th October you will be led to vote on the Sustainable Use of pesticides Regulation (SUR). As you may know, this Regulation aims mainly to fix reduction targets of the use and the risk of pesticides in addition to the use of the most hazardous pesticides.

Pesticides have far-reaching impacts on human health, ecosystems, and biodiversity. In terms of human health, exposure to pesticides can lead to various acute and chronic health problems, including respiratory issues, skin conditions, and potentially life-threatening illnesses. Moreover, a long-term combined with a low-dose exposure to certain pesticides has been linked to chronic diseases such as cancer, neurological disorders, and developmental issues, especially in vulnerable populations like children and pregnant women. Ecosystems suffer as well, as pesticides can disrupt the balance of natural habitats, harm non-target species, and contaminate soil and water, leading to declines in biodiversity. Protecting both human health and the environment necessitates careful management and regulation of pesticide use, with an emphasis on sustainable, alternative pest control methods.

Moreover synthetic agricultural pesticides constitute a financial cost for European Union and Member States whose 2.3 billion euros are attributable to pesticides uses and 105.9 billion euros partly attributable.¹ Therefore, it is important that SUR is ambitious and engages the transition towards agroecological practices including organic farming. Nonetheless, this transition is neither synonym of a threat for food sovereignty nor of declining economic performances as shown in the study of the French National Institute of Agricultural Research and Environment (INRAE) entitled [European Pesticide-Free Agriculture in 2050](#).

However, this Regulation would be inefficient without the correct indicator to track and report reductions target. Indeed, in its effort to make the goal of a 50% reduction measurable and binding, the European Commission has proposed the Harmonized Risk Indicator 1 (HRI 1) as a means to monitor its achievement. However, this indicator, currently under discussion, is highly problematic, as demonstrated in a report published by our colleagues of [Global 2000 Austria](#).

The report shows that HRI 1 discriminates most strongly against pesticides used in organic farming. But even among conventional pesticides, there is a systematic bias in favor of the most toxic ones, with their toxicity consistently underestimated when HRI 1 is applied. This is particularly true for highly toxic insecticides like pyrethroids or neonicotinoid pesticides, due to an inverse correlation between the toxicity of pesticide active substances and their application rates per hectare. Because of the systematic underestimation of the

¹ CCFD-Terre Solidaire, Pollinis, BASIC , [Pesticides : a model that's costing us dearly](#)



risks of synthetic pesticides, and at the same time, the exorbitant overestimation of the risks of active substances used in organic farming of natural origin, the application of HRI 1 jeopardizes other important goals of the Green Deal in addition to the 50% pesticide reduction target. This includes goals related to reversing the decline of pollinators and expanding organic farming to cover 25% of the EU's agricultural area.

Other indicators exist at national level. For example in France an indicator based on the number of doses of pesticides used (called NODU) enables to have a clear and unbiased view of pesticide use. In Germany the German environment Agency UBA has published a [document](#) showing that it is possible to amend the actual proposed HRI1 methodology by the standardisation of sales data with substance specific application rates and the reduced weighting factor for active substances with expired approval. With this methodology no need to wait until 2028 and better statistics to act and improve the indicator!

That is why, we encourage the Members of the ENVI Committee to stand for a better indicator in order to tackle the challenges of public health, biodiversity loss and agricultural transition raised by the use of pesticides.

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General Delegate of Générations Futures