

Brussels, 23 September 2026

Dear Chair Vrecionová,
Dear Chair Maran,

Cc: Ms Roberta Metsola, President of the European Parliament

Subject: Ensuring a full, science-based hearing on the Food and Feed Safety Omnibus

As the European Parliament and Council finalise their positions on the Food and Feed Safety Omnibus, BeeLife urges the ENVI and AGRI committees to ensure that this process is guided by independent, science-based evidence heard from all sides – not by the opinions of those best placed to privatise the benefits of weaker pesticide rules while the resulting costs fall on pollinators, ecosystems and public health.

BeeLife European Beekeeping Coordination is a European civil society organisation dedicated to protecting pollinators and promoting sustainable beekeeping. For over a decade, we have contributed independent scientific and policy expertise on bee ecotoxicology and pesticide risk to EU legislative processes, including the framework now under revision as part of this Omnibus.

We are concerned that the joint ENVI–AGRI hearing held on 2 September 2026 gave the floor overwhelmingly to representatives of pesticide-intensive agricultural and agrochemical interests. Only one independent scientist addressed the environmental toxicity of the substances concerned, and no expert on the human-health impacts of pesticides was invited to speak. Regulatory proposals that will shape the level of protection afforded to pollinators, biodiversity and public health for years to come cannot be built on opinions; they must be built on the best available, independent science.

We recognise genuine improvements in the Council's general approach, agreed on 27 May 2026: restricting unlimited-duration approval to low-risk substances only; excluding substances that are reprotoxic, carcinogenic (category 2), CMR-classified, approved through derogation, or subject to an Article 21 review or Article 6(f) approval from automatic prolongation; and mandating EFSA to carry out a periodic, targeted reassessment of the scientific literature and monitoring data. We encourage the co-legislators to build on these safeguards rather than dilute them elsewhere in the text.

However, several other elements of the state of play we are tracking raise serious concerns for pollinator and ecosystem protection:

- **Extended approval periods** – up to 15 years for first approvals and 25 years for renewals outside the low-risk category, reducing the frequency of independent re-assessment precisely as new science on pollinator impacts continues to emerge.
- **Approval criteria diluted by risk-management measures** – a step back from the hazard-based approach that has underpinned EU pesticide law, as the Council text itself acknowledges.
- **Weakened derogations and optional phase-out plans** – the conditions for requesting a derogation would be eased, and the phase-out plan attached to certain approvals would become optional rather than obligatory.
- **No improvement to grace periods** – missing an opportunity to strengthen protection during the transition after a substance is withdrawn.
- **A biocontrol definition that risks capturing higher-risk substances** – extending “biocontrol” to cover heavy metals and their salts, and synthetic substances “functionally identical or structurally similar” to natural ones, blurs the line with genuinely low-risk alternatives.
- **Guidance capped to what is “approved,” not what is known** – requiring Member States to rely only on already-approved guidance documents, rather than the latest available science, when assessing risk.
- **Expansion of emergency authorisations** – an Article 53 emergency authorisation granted in one Member State would automatically extend to every Member State in the same zone, bypassing ordinary scientific scrutiny.
- **Drone applications of pesticides** allowed without defining any conditions of use or sharing pesticide data. As BeeLife, we have been asking for a science-based decision, and drone application should be allowed only if it is considered aerial spraying (what else?) and it is proven to reduce pesticide use and risk. Furthermore, drones should collect data on pesticide use (quantity, product, date/time and location of application, etc.) and make it publicly available. If we allow this technology for pesticide use, society as a whole should truly benefit from the opportunities it offers.

We also note that technical discussions in Parliament have so far concentrated heavily on the rules for drone-based application of plant protection products, while these authorisation and derogation questions – with far greater consequences for pollinator and ecosystem health – have received comparatively less scrutiny. If the committee vote, originally expected on 5 October, is delayed, we would encourage the additional time to correct the scientific imbalance in the process, including through further expert hearings.

We would welcome the opportunity to share BeeLife's scientific evidence base with the ENVI and AGRI committees, and to see independent scientists with expertise in ecotoxicology and human health included in any further hearings on this file. We remain at your disposal to provide data, analysis, or expert input as negotiations continue.

We thank you for your attention to this matter and for your commitment to evidence-based policymaking.

Yours sincerely,

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