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NOTE

From: General Secretariat of the Council
To: Delegations

Subject: AOB item for the meeting of the "Agriculture and Fisheries" Council of
23 February 2026:
A call for measures ensuring the availability of conventional crop protection
solutions and securing viability of food production
- Information from Estonia, supported by Czechia, Latvia, Lithuania,
Portugal and Romania

The Commission states in its Communication "*A vision for Agriculture and Food¹*" that the long-term ability of farmers to produce food and remain resilient depends on resilient ecosystems, the maintenance of soil health, pest and disease control, crop pollination, water quality and availability, clean air, and climate conditions.

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52025DC0075>

It also states that farmers need a more advanced toolbox to farm in a nature friendly way. The Commission has recognised that the introduction of alternatives has not kept pace with the withdrawal of chemical active substances from the EU market and that this may affect the EU's capacity to ensure food production. It has also committed to refrain from further bans where **alternatives are not available**, unless a substance poses a threat to human health or the environment, and to accelerate access to biopesticides.

The Omnibus proposal includes provisions aiming to accelerate the access of biopesticides to the market, and further simplification, but our main **concerns relate to the lack of practical legal provisions to ensure that the viability of agriculture is considered both in the approval process for active substances and in the authorisation of plant protection products, particularly when alternatives are not available**. Food and Feed Safety Simplification Package (Omnibus X) unfortunately does not address **the commitments the Commission has made in its Communication "A vision for Agriculture and food"**.

As suggested by Estonian scientist, we propose that decision making cannot be based solely on safety criteria but **must also be subject to a mandatory socio-economic sustainability assessment in cases where alternatives are not available**. To this end, Regulation (EC) No 1107/2009² should be amended so that approval criteria for active substances and authorisation requirements for plant protection products include, **where alternatives are not available, an assessment of the viability of crop production**, without justifying the continued use of substances posing unacceptable risks.

² Regulation (EC) No 1107/2009 of the European Parliament and of the Council of 21 October 2009 concerning the placing of plant protection products on the market and repealing Council Directives 79/117/EEC and 91/414/EEC

According to the opinion of our scientist³, biological plant protection products are not alternatives or substitutes for chemical plant protection products, rather they represent a new, different approach to plant protection. Among biological plant protection products, there are no replacement options with the same effect as chemical active substances, and therefore these cannot be replaced on a one-to-one basis for all uses. **Since chemical plant protection products are usually effective against specific pests and diseases, reducing chemical active substances may narrow the range of pests and diseases that can be controlled and increase the number of harmful organisms for which no control solutions exist.** Ultimately, this could lead to issues such as resistance development due to the repeated use of remaining products, decreased yield and quality, and the spread of new pests and diseases because of limited availability of effective treatments. Lower yields will inevitably lead to higher prices, an increase in the import of agricultural products, and a decrease in exports, as well as greater environmental impacts in third countries, which will have to compensate for Europe's lower productivity to meet demand⁴.

Therefore, we propose that the Regulation (EC) No 1107/2009 should additionally be amended. This proposal is aimed to further improve the approval and authorisation processes for active substances and plant protection products, and ultimately to achieve legislation that ensures the **viability of agriculture is considered alongside wider societal and environmental impacts**, particularly in cases where effective alternatives are not available.

³ https://www.pikk.ee/wp-content/uploads/2026/01/Bioloogilised_taimkaitsevahendid_lopparuanne.pdf

⁴ Finger, R. (2024). Europe's ambitious pesticide policy and its impact on agriculture and food systems. *Agricultural Economics*, 55, 265–269. <https://doi.org/10.1111/agec.12817>