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COVER NOTE

From:	General Secretariat of the Council
To:	Delegations
Subject:	Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Council Directive 98/58/EC and Directive 2009/128/EC of the European Parliament and of the Council as regards the simplification and strengthening of food and feed safety requirements, and repealing Council Directives 82/711/EEC and 85/572/EEC [17055/25 - COM(2025)1021] Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulations (EC) No 999/2001, (EC) No 1829/2003, (EC) No 1831/2003, (EC) No 852/2004, (EC) No 853/2004, (EC) No 396/2005, (EC) No 1099/2009, (EC) No 1107/2009, (EU) No 528/2012, (EU) 2017/625 as regards the simplification and strengthening of food and feed safety requirements [17056/1/25 - COM(2025)1030 Final/3] - Opinion of the European Economic and Social Committee

Delegations will find enclosed the opinion of the European Economic and Social Committee[1] on the above.

[1] Food and feed safety simplification omnibus | EESC

European Economic and Social Committee

OPINION

European Economic and Social Committee

Food and feed simplification omnibus

Proposal for a Directive amending Council Directive 98/58/EC and EP and Council Directive 2009/128/EC and repealing Council Directives 82/711/EEC and 85/572/EEC – simplification and strengthening of food and feed safety requirements

Proposal for a Regulation amending Regulations (EC) No 999/2001, (EC) No 1829/2003, (EC) No 1831/2003, (EC) No 852/2004, (EC) No 853/2004, (EC) No 396/2005, (EC) No 1099/2009, (EC) No 1107/2009, (EU) No 528/2012, (EU) 2017/625 – simplification and strengthening of food and feed safety requirements
(COM(2025) 1021 final – 2025/0409 (COD))
(COM(2025) 1030 final)

NAT/971

Rapporteur: **Felipe MEDINA**
Co-rapporteur: **John COMER**

EN

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Advisors	María MARTÍNEZ-HERRERA HERNÁNDEZ (to the rapporteur) Frank ALLEN (to the co-rapporteur)
Legislative procedure	EU Law Tracker
Referral	European Parliament, 14/1/2026 Council, 17/2/2026 and 1/4/2026
Legal basis	Articles 43(2), 114, 168(4)(b), 192(1) and 304 of the Treaty on the Functioning of the European Union
European Commission documents	COM(2025) 1021 final – 2025/0409 (COD) COM(2025) 1030 final Summary of COM(2025) 1030 final - 2025/0409 (COD)
Relevant Sustainable Development Goals (SDGs)	SDG 3 – Good health and well-being SDG12 – Responsible consumption and production
Section responsible	Section for Agriculture, Rural Development and the Environment
Adopted in section	16/4/2026
Adopted at plenary session	29/4/2026
Plenary session No	605
Outcome of vote (for/against/abstentions)	171/2/1

1. RECOMMENDATIONS

The European Economic and Social Committee (EESC)

1.1 welcomes the overall thrust of the food and feed safety simplification package which should reduce unnecessary administrative burdens and costs for all stakeholders, but stresses that any simplification must not compromise the EU's high standards for food and feed safety, environmental protection, and public health. Cumulative reporting and administrative obligations should be streamlined, as they continue to place a significant burden on stakeholders. Further simplification, beyond the proposed measures, would help, but not at the expense of transparency, accountability, or the precautionary principle.

1.2 considers that the current simplification exercise represents a strategic opportunity to improve regulatory clarity, strengthen the cohesion of the internal market and promote a more integrated approach to competitiveness and sustainability. By tackling the systemic shortcomings the Union can simultaneously advance its ambitions and bolster its economic resilience.

1.3 highlights the importance of regulatory quality. While simplification initiatives underline the value of reviewing the *acquis*, they also point to a structural challenge: legislation grounded in robust impact assessments, sound evidence and meaningful stakeholder engagement. The role of civil society in the monitoring and enforcement of the legislation should be further consolidated.

1.4 is of the view that, provided that the fundamental objectives of the existing *acquis* are fully safeguarded, simplification can help create a more streamlined and effective regulatory framework, while at the same time supporting the competitiveness and resilience of the European economy.

1.5 considers that a selective review of the *acquis* would make it possible to identify provisions that have become outdated or whose complexity is no longer justified in the light of scientific, technical and operational developments in the sector.

1.6 stresses that the Regulations on food hygiene and the Regulation on materials in contact with food are of fundamental importance for the proper functioning of the agri-food chain, including for workers and working conditions. In this regard, the EESC considers it appropriate to carry out a more in-depth review – in close cooperation with representatives of civil society, independent experts, the Council and the European Parliament – of possible simplification options that would improve the effective and harmonised application of the rules in the Member States, without compromising the high level of environmental and public health protection for workers and consumers.

1.7 While welcomes the proposal to facilitate greater use of drones for spraying pesticides – and in fact proposes that this scope be expanded even further – at the same time emphasises the need for proper protections, especially in the case of pesticide spray drift, which could have environmental consequences for workers, and neighbouring farmers, especially organic farmers, along with the need for permanent visual human oversight. It is important to safeguard the health and environment of non-farmer rural residents and of all workers involved in the use of pesticides.

The EESC also recommends that farmers and contractors be certified as qualified to carry out drone-spraying.

1.8 believes that the European Food Safety Authority should have the right to raise the alarm on the need for targeted reassessments of active substances with unlimited approval, to ensure independence and transparency. This matter should not be solely confined to the Commission and the Member States. In addition, it is important that the European Food Safety Authority be asked to give an opinion on the appropriateness of any particular grace period as part of the risk assessment process. Wider consultation will usually result in better decision-making.

1.9 views positively the acceleration and simplification of the authorisation processes for biocontrol products. The EESC also calls for grace periods to be harmonised at the highest level of protection across the entire EU, requesting that these be the same throughout the EU in order to avoid imbalances between the Member States.

1.10 supports the authorisation of plant protection products (PPPs) containing EU-approved active substances for seed treatments intended for export, provided such use complies with the regulatory requirements of the destination country.

1.11 proposes that private sanitary and certification analyses carried out by companies be recognised as official in order to simplify the export procedure to non-EU countries. This possibility would prevent companies from having to perform an analysis in-house and then duplicate it with an analysis carried out by a second official laboratory. This measure would result in significant savings in costs and time, but would require authorities to put in place stricter controls and fines to allow for such recognition.

1.12 While recognising the importance of equivalence of standards, is concerned by the elimination of import tolerances for certain substances not authorised in the EU, and considers that an impact assessment is essential for such major changes to Regulation (EC) No 396/2005 on maximum residue levels (MRLs), in line with the precautionary principle. The implications of these changes could prove disastrous for all actors in the chain who rely heavily on imports, and ultimately affect EU livestock farmers, EU food security and EU consumers.

1.13 Considers that biocontrol substances should be allowed to use heavy metals such as copper, provided that human, animal and soil health and biodiversity are guaranteed. Nevertheless, while organic farming and other forms of agricultural practices face challenges, the solution is not to perpetuate the use of toxic substances. For this reason, the EESC is also calling on the EU to invest in truly sustainable alternatives and support farmers in transitioning away from all hazardous inputs.

1.14 Is of the view that before withdrawing an active substance that is a candidate for substitution, the Commission needs to be certain that the alternative has an equivalent level of effectiveness and is economically viable. Substitution must not create new dependencies or risks.

1.15 Considers that genetically modified micro-organisms should not be used as producers of the final products when it comes to recreating or mimicking animal products. Consumers have the right to

know about the use of and to avoid GMO foods. The EU must uphold the highest standards of transparency and safety in novel foods.

1.16 Calls for the harmonisation of seed labelling to include relevant precautionary and risk management measures ; in addition, considers that seeds treated with plant protection products must be subject to the same regulations as plant protection products.

2. EXPLANATORY NOTES

Arguments in support of recommendation 1.1-1.3

2.1 The EESC observes that the substantial volume of legislation adopted during the 2019-2024 term of office has created significant implementation challenges for many private-sector actors across the European Union. The Draghi Report on the Future of European Competitiveness (September 2024) highlighted a significant divergence in the volume of legislative activity in this period between the EU and the US: 13 000 pieces of legislation were passed by the EU compared to 3 500 in the US. The Draghi Report recommends a fundamental shift towards simplifying the 'stock' of existing regulation and curbing the 'flow' of new rules.

2.2 Simplification must be carefully calibrated to avoid legal uncertainty, social or environmental deregulation or any kind of fragmentation. Timely and accessible guidance, reinforced coherence between legal instruments and clear communication from the institutions are essential to ensure consistent implementation and legal certainty across the Member States. It is essential that all stakeholders, including civil society organisations, are involved in the process.

Arguments in support of recommendation 1.4

2.3 The EESC considers that the scope of the omnibus initiative could be further strengthened to deliver tangible improvements, by addressing inconsistencies in reporting methodologies and data requirements across parallel legislation.

2.4 The EESC reaffirms its support for the Union's food/feed objectives and recognises the role of EU legislation in advancing more sustainable production and consumption patterns. At the same time, the EESC stresses that effectiveness ultimately depends on the quality, coherence and practical feasibility of the policy instruments adopted.

Arguments in support of recommendations 1.5 and 1.6

2.5 The EESC stresses that the significant advances in risk assessment techniques in recent years, as well as the availability of viable and safe alternatives for the use or treatment of animal by-products, justify a reconsideration of certain regulatory requirements. A proportionate adaptation of these rules, based on the latest scientific knowledge and experience gained, would make it possible to maintain a high level of protection for the environment and for human and animal health, while improving the effectiveness, consistency and practical applicability of the regulatory framework. A clear example of this is Regulation (EC) No 1069/2009 on animal by-products (APB); after 16 years, this framework should be revised to reflect the technical improvements in

treatment processes and the proven reduction of risks, and to ensure alignment with more recent waste-related legislation, for example Directive (EU) 2018/851. The co-existence of the two pieces of legislation creates a regulatory overlap in the treatment of former foodstuffs and category-three animal by-products. Furthermore, the current discrepancies in how the framework regulation is applied across the Member States create barriers that must be addressed.

Arguments in support of recommendation 1.7

2.6 Drones provide extra possibilities for limited and precise spraying of pesticides. Adequate provision must be made for health and safety issues, and also for the protection of the environment due to problems with pesticide spray drift. Unintended consequences could include pesticide spray landing on neighbouring land, rivers or natural areas. Non farming rural residents could also be at risk of contamination by pesticide spray. The proper use of drones can lead to a more efficient use of pesticides and also have the potential to reduce the quantity of pesticides used. Farmers and contractors must be officially certified as qualified to carry out the drone-spraying of pesticides.

Arguments in support of recommendation 1.8

2.7 The EESC considers it important that Member States take measures to facilitate and encourage the submission of applications to extend authorisations of already authorised plant protection products for minor uses.

2.8 The EESC considers that the European Food Safety Authority (EFSA) should have a right to be involved in the reassessment of unlimited active substances to ensure transparency and independence. The EFSA's independence must be strengthened and it must be given the necessary resources to carry out its expanded role.

2.9 The work programme for the targeted reassessment of active substances should not be confined to the Commission only. The EFSA should also be enabled to raise the alarm on the need for reassessment. This would introduce an increased level of independence and transparency.

2.10 In any reassessment of active substances with unlimited approval, the EFSA must be able to access the latest scientific and technical knowledge and any peer reviewed research as part of this investigation. It must not be required to rely exclusively on the last assessment conducted at EU level for the active substances.

2.11 To protect human health and the environment, it is important that the EFSA be consulted as to the appropriateness of any grace period being proposed, as part of the risk assessment process. It is important for there to be no significant weakening of the EU pesticide regulatory framework, and therefore the EFSA has an important role to play to ensure the protection of human health and the environment. There must be no decrease in standards as regards the protection of the health and safety of consumers and workers.

Arguments in support of recommendation 1.10

2.12 Regarding the authorisation of plant protection products (PPPs) for seed treatment, once a PPP is authorised for seed treatment use in one Member State, its application should be considered safe and acceptable in all other Member States. The relevant environmental and human health minimal standards should be the same in all Member States.

2.13 Currently, PPPs must be authorised at national level, even when the treatment is performed in closed professional facilities and the seeds are not intended for use within the EU. This creates unnecessary regulatory barriers and delays, even though the destination countries have their own approval systems.

Arguments in support of recommendations 1.8 and 1.9

2.14 There is lack of clarity and consistency in current EU legislation regarding the use of seed stocks after the withdrawal of plant protection product (PPP) authorisations. As sowing and harvest timings vary across crops and Member States, the absence of defined grace periods creates uncertainty for seed companies and farmers. Including grace periods for the sowing of treated seeds for at least two growing seasons, considering the time of year when seeds are sown and when the commodities are harvested, may be a good option.

Arguments in support of recommendation 1.18

2.15 Seed treatment constitutes a sustainable use of a plant protection product. High-quality, clean and pest-free seeds is an essential precondition for sustainable agriculture and is a fundamental pillar of Integrated Pest Management. Plant breeders need to be able to use PPPs at defined steps to enable trait selection, unhampered by pest pressure, to ensure trait expression in company trials and official variety testing, and to produce healthy seeds free from transmittable pests and diseases during multiplication. Limiting or prohibiting these activities in sensitive areas, potentially as the omnibus indirectly does, is aligned with the precautionary principle and should not undermine varietal progress for farmers while delivering human health and environmental benefits.

Arguments in support of recommendation 1.11

2.16 There is a need to simplify the procedures for exporting plant protection products to non-EU countries so as to avoid having duplicate analysis carried out in a second laboratory. This should lead to significant savings in time and money and lead to much greater efficiency in exporting PPPs to non-EU countries.

Arguments in support of recommendation 1.13

2.17 Aligning the criteria for setting import tolerances with the hazard-based criteria of Regulation (EC) No 1107/2009, especially those related to environmental protection and human health, would first have far-reaching consequences on the ability of the EU to source essential commodities, such as high-quality protein crops, for which the EU is still highly dependent on the global market. Furthermore, the disputable compatibility of such measures with WTO rules,

especially if not supported by an impact assessment, would expose the EU to trade retaliation, putting the EU's competitiveness further at risk and weakening the ability of EU value chains to show resilience in the face of rising geopolitical uncertainty and market shocks. EU food security should remain a guiding principle when revising the regulatory frameworks governing food and feed safety.

Arguments in support of recommendation 1.15

2.18 It is far too restrictive to rule out all use of heavy metals in biocontrol substances. Nevertheless, the solution is not to perpetuate the use of toxic substances. The EESC is therefore calling on the EU to invest in truly sustainable alternatives and support farmers in transitioning away from all hazardous inputs.

Arguments in support of recommendation 1.16

2.19 Farmers must be certain that any substance substituted for an active substance must be effectively equivalent to and as economically viable as the original active substance. Substitution must not create new dependencies or risks.

Arguments in support of recommendation 1 .17

2.20 The Commission proposal runs the risk of creating products produced by GMOs rather than merely supported by GMOs. Consumers have the right to know that GMOs have been used and to avoid GM foods.

3. PROPOSED AMENDMENTS TO THE LEGISLATIVE PROPOSAL OF THE EUROPEAN COMMISSION

Amendment 1
linked to recommendation **1.15**
Article 1(2) of COM(2025) 1030 final, modifying Article 3 of Regulation (EC) No 1107/2009

Text proposed by the European Commission	EESC amendment
(2) Article 3 is amended as follows: […] (c) the following point 35 is added: '35. 'biocontrol substance' means: (a) micro-organisms, (b) inorganic substances as occurring in nature, ***with the exception of heavy metals and their salts*** or (c) substances of biological origin or produced synthetically that are functionally identical and structurally similar to them.';	(2) Article 3 is amended as follows: […] (c) the following point 35 is added: '35. 'biocontrol substance' means: (a) micro-organisms, (b) inorganic substances as occurring in nature, or (c) substances of biological origin or produced synthetically that are functionally identical and structurally similar to them.';

Reason
Biocontrol definition The definition of 'biocontrol substance' must include heavy metals such as copper, which are essential for organic production and for other forms of agriculture.

Amendment 2

linked to recommendation **1.7**

Amendment to Article 1(2) of COM(2025) 1021 final, modifying Article 9 of Directive 2009/128/EC

Text proposed by the European Commission	EESC amendment
(2) Article 9 is amended as follows: a. ***in paragraph 1, the following new subparagraph is added:*** ***'The prohibition provided for in the first subparagraph may only be derogated from in accordance with paragraphs 2 to 6 of this Article or with Article 9a.'*** b. in paragraph 2, the first sentence of the first subparagraph is replaced by the following: ***'2. By way of derogation from paragraph 1, aerial spraying may be allowed in special cases provided the following conditions are met:';***	(2) Article 9 is amended as follows: a. ***paragraph 1 is replaced by the following:*** ***'Member States may permit drone-spraying, provided that proper environmental and human health protective measures are provided for, especially in relation to pesticide spray drift.*** b. in paragraph 2, the first sentence of the first subparagraph is replaced by the following: ***'2. Drone-spraying may be permitted provided the following conditions are met:'*** c. ***in paragraph 2, point (a) is replaced by the following:*** ***'(a) it poses a lower risk to human health and the environment as compared with land-based application of pesticides, in accordance with Article 9a(2);***

Reason
Directive 2009/128/EC currently stipulates that Member States are to ensure that aerial spraying is prohibited (Article 9(1)) but provides for derogations in special cases (Article 9(2)). Since the adoption of Directive 2009/128/EC, aerial spraying technology has evolved significantly. Recent analyses highlight the development of advanced drone systems equipped with precision application and sensor-based control, enabling improved accuracy and efficiency while reducing chemical inputs. As demonstrated in the study entitled *A review of drone technology and operation processes in agricultural crop spraying*[1], the use of drones has made it possible to reduce water and chemical consumption, in some cases maintaining effectiveness with a reduction of up to 30% in pesticide dosage. In addition to these demonstrated technical efficiencies, recent reports[2] indicate that drones are increasingly being used by European farmers for data-driven decision-making related to soil conditions, crop health and resource management. Taken together, these developments support the need to allow aerial spraying by 2026 in order to reflect technological progress and the current operational realities of European agriculture.

Furthermore, in accordance with the principles enshrined in Article 5 of the Treaty on European Union (TEU), particularly the principles of subsidiarity and proportionality, the European Union is to act only where the objectives of a proposed measure cannot be sufficiently achieved by the Member States at national, regional or local level, and where such action would be more effective. Consequently, in cases where alternative methods of pesticide application, such as aerial or land-based spraying, yield equivalent outcomes in terms of human health and environmental protection, the principle of subsidiarity dictates that the choice of method should remain with the farmers themselves. Therefore, when outcomes are equivalent, it is both legally and policy-wise justified to grant farmers the autonomy to determine the method of pesticide application best suited to their circumstances, in accordance with the new Article 9a(2).

Amendment 3

linked to recommendation 1.7

Article 1(3) of COM(2025) 1021 final, adding a new Article 9a to Directive 2009/128/EC

Text proposed by the European Commission	EESC amendment
Aerial spraying of pesticides by unmanned aircraft systems 1. ***By way of further derogation from Article 9(1),*** Member States may, in the case of professional users, exempt from the ***prohibition*** laid down in that Article, the aerial spraying of pesticides by unmanned aircraft systems identified pursua nt to paragraph 2.[...] 2. The Commission shall adopt a delegated act in accordance with Article 20a supplementing this Directive to identify the types of unmanned aircraft systems that have lower or equal risks compared to the risks arising from land-based application equipment for the same use.	Aerial spraying of pesticides by unmanned aircraft systems 1. Member States may, in the case of professional users, exempt from the ***conditions*** laid down in that Article, the aerial spraying of pesticides by unmanned aircraft systems identified pursuant to ***Article 9*** paragraph 2. [...] 2. The Commission shall adopt a delegated act in accordance with Article 20a supplementing this Directive to identify the types of unmanned aircraft systems that have lower or equal risks compared to the risks arising from land-based application equipment for the same use. ***Particular attention is needed when evaluating the risk of pesticide spray drift onto adjoining land, rivers or natural areas, and onto the property of non-farming rural dwellers. Farmers and contractors shall be allowed to use drones provided that they are officially certified as qualified to carry this out.***

Reason
Ensuring health and safety and the protection of the environment when using drones to spray pesticides is essential, especially with regard to workers that work close to pesticide application.

Amendment 4

Article 1(4) of COM(2025) 1030 final, modifying Article 5 of Regulation 1107/2009

Text proposed by the European Commission	EESC amendment
(4)Article 5 is replaced by the following: ‘Article 5 First approval The first approval shall be for an unlimited period except for: (a)active substances that are identified as candidates for substitution in accordance with Article 24; (b)active substances that are approved under Article 4(7); or (c) active substances for which a limited period of approval is set in accordance with Article 6 (j) in particular in the light of relevant uncertainties emerging from the risk assessment including as a result of data gaps.’	(4)Article 5 is replaced by the following: ‘Article 5 First approval The first approval shall be for an unlimited period except for: (a)active substances that are identified as candidates for substitution in accordance with Article 24; (b)active substances that are approved under Article 4(7); or (c) active substances for which a limited period of approval is set***, the length of which is to be recommended by the authority*** in accordance with Article 6 (j) in particular in the light of relevant uncertainties ***and critical areas of concern*** emerging from the risk assessment including as a result of data gaps ***and for substances with mutagenic, carcinogenic, or reprotoxic properties as well as endocrine disruptors that may cause adverse effects in humans and in non-target organisms***.

Reason
The Commission proposes changes to Regulation (EC) 1107/2009 that would reverse the current approach of periodic approvals, making unlimited approval of active substances for plant protection products the rule. As exposure to chemicals and pesticides is among the most dangerous occupational hazards to agri-food workers, and the periodic reviews have been seen as a regulatory tool to ensure independent and thorough scrutiny, taking evolving scientific evidence into account. Moreover, even with the strengthened role of EFSA in raising the need for targeted reassessment the proposed targeted reassessment risk will likely not be sufficient to balance this out as the provision still grants the Commission broad discretion rather than obligating it to act based on the latest scientific information or on requests from Member States. The amendments are proposing a more risk-based and targeted approach to the approval and renewal of active substances, very much in line with the precautionary principle, which would narrow the scope of substances with unlimited approval to low-risk substances.

Amendment 5

Article 1(9) of COM(2025) 1030 final, modifying Article 14 of Regulation 1107/2009

Text proposed by the European Commission	EESC amendment
(9) Article 14 is replaced by the following: ‘Article 14 Renewal of approval	(9) Article 14 is replaced by the following: ‘Article 14 Renewal of approval

1. (…) 2. The renewal of approval of active substances shall be for an unlimited period, except for: (a)active substances that are approved as candidates for substitution in accordance with Article 24, (b)active substances whose approvals are renewed under Article 4(7); or (c)active substances for which a limited period of ***renewal*** is set in accordance with Article 6 (j) in particular in the light of relevant uncertainties emerging from the risk assessment including as a result of data gaps.***';***	1. (…) 2. The renewal of approval of active substances shall be for an unlimited period, except for: (a)active substances that are approved as candidates for substitution in accordance with Article 24, (b)active substances whose approvals are renewed under Article 4(7); or (c)active substances for which a limited period of ***approval*** is set***, the length of which is to be recommended by the authority*** in accordance with Article 6 (j) in particular in the light of relevant uncertainties ***and critical areas of concern*** emerging from the risk assessment including as a result of data gaps ***and for substances with mutagenic, carcinogenic, or reprotoxic properties as well as endocrine disruptors that may cause adverse effects in humans and in non-target organisms***.

Reason
Same reason as for Amendment 4.

Amendment 6

linked to recommendation 1.8

Article 1(11) of COM(2025) 1030 final, adding a new Article 18a to Regulation 1107/2009

Text proposed by the European Commission	**EESC amendment**
Work programme for targeted reassessment of active substances 1. The Commission may initiate a targeted reassessment of the approval of active substances at any time, to verify whether certain approval criteria or specific aspects thereof are, in the light of current scientific and technical knowledge still met. It may, after consulting the Authority, and in accordance with the procedure referred to in Article 79(3), adopt implementing acts identifying active substances or groups of active substances with limited or unlimited approval periods for targeted reassessment. The identification of the active substances	Work programme for targeted reassessment of active substances 1. The Commission may initiate a targeted reassessment of the approval of active substances at any time, to verify whether certain approval criteria or specific aspects thereof are, in the light of current scientific and technical knowledge still met. ***The European Food Safety Authority shall have the right to raise the alarm regarding the need for a targeted reassessment of active substances with unlimited approval.*** ***The Commission*** may, after consulting the Authority and in accordance with the procedure referred to in Article 79(3), adopt implementing acts identifying active

concerned shall be based on the same criteria as laid down in ***Article 18(1)***.	substances or groups of active substances with limited or unlimited approval periods or targeted reassessment. The identification of the active substances concerned shall be based on the same criteria as laid down in ***Article 18***.

Reason
The European Food Safety Authority should also be involved to ensure transparency and broaden the scope of the assessment.

Amendment 7

linked to recommendation 1.8

Article 1(13) of COM(2025) 1030 final, modifying Article 20(2) of Regulation 1107/2009

Text proposed by the European Commission	**EESC amendment**
2. The Regulation referred to in paragraph 1 shall provide for a maximum grace period that the Member States may set when withdrawing or amending authorisations for plant protection products as a result of that Regulation. That maximum grace period shall normally not exceed 6 months for the sale and distribution, and in addition a maximum of one year for the disposal, storage, and use of existing stocks of the plant protection products concerned. In case there are no other available reasonable means to plant protection products containing the active substances concerned, the maximum grace period should not exceed one year for the sale and distribution, and in addition a maximum of two years for the disposal, storage, and use of existing stocks of the plant protection products concerned. In case of immediate and serious concerns ***for human health*** or ***animal*** health or ***the environment that led*** to withdrawal on non-renewal of the approval, the Regulation referred to in paragraph 1 shall provide that the Member States may not set a grace period.	2. The Regulation referred to in paragraph 1 shall provide for a maximum grace period that the Member States may set when withdrawing or amending authorisations for plant protection products as a result of that regulation. That maximum grace period shall normally not exceed 6 months for the sale and distribution, and in addition a maximum of one year for disposal, storage and use of existing stocks of the plant protection products concerned. In case there are no other available reasonable means to plant protection products containing the active substance concerned, the maximum grace period should not exceed one year for the sale and distribution, and in addition a maximum of two years for the disposal, storage, and use of existing stocks of the plant protection products concerned. ***The Member States may consult the European Food Safety Authority for its opinion on the granting of a grace period as part of the risk assessment process.*** In case of immediate and serious concerns, or ***where the active substance does not meet approval criteria related to human*** health or ***environmental protection, leading*** to withdrawal or non-renewal of the approval, the Regulation referred to in paragraph 1 shall provide that the Member States may not set a grace period.

Reason

It is important to get an independent expert opinion when deciding on the appropriateness of a grace period.

Amendment 8

linked to recommendation 1.10

Article 1(33)(d) of COM(2025) 1030 final, modifying Article 51(9) of Regulation 1107/2009

Text proposed by the European Commission	EESC amendment
9. detailed rules for the implementation of this Article 51 ***may*** be established in accordance with the procedure referred to in Article 79(3)	9. detailed rules for the implementation of this Article 51 ***shall*** be established in accordance with the procedure referred to in Article 79(3)

Reason
This Article needs to be strengthened by replacing the word ‘may’ with the word ‘shall’.

Amendment 9

linked to recommendation 1.16

Amendment to Article 1(16) of COM(2025) 1030 final, modifying Regulation (EC) No 1107/2009

Text proposed by the European Commission	EESC amendment
	A new paragraph (16a) is added: (16a) ***Article 24 (Candidates for substitution) is amended as follows:*** ***A new paragraph 3 is added:*** ***3. Before withdrawing or not renewing the approval of an active substance approved as a candidate for substitution, the Commission shall assess whether alternative substances or methods are available that provide an equivalent level of effectiveness and are economically viable for farmers, while ensuring a high level of protection of human health and the environment. Substitution must not create new dependencies or risks***.

Reason
In order to ensure food security in Europe, farmers must have all possible substances to protect their crops from pests and adverse weather conditions.

Amendment 10

Article 1(17) of COM(2025) 1030 final, inserting new Article 27a of Regulation 1107/2009

Text proposed by the European Commission	EESC amendment

(17) a new Article 27a is inserted: ‘Article 27a Approval periods of already granted approvals 1. For all active substances approved at the latest on (…) [OP please insert the date of entry into force of this Regulation], approvals shall be deemed unlimited in time, except for: (a)active substances identified as candidates for substitution in accordance with Article 24; (b)active substances approved under Article 4(7); (c)active substances for which the submission of an application for renewal under Article 15(1) was required before [OP: please insert the date of entry into force of this Regulation] but was not submitted before the deadline referred to in Article 15(1); (d)active substances for which a procedure for the renewal of approval is ongoing on [OP: please insert the date of entry into force of this Regulation].	(17) a new Article 27a is inserted: ‘Article 27a Approval periods of already granted approvals 1. For all active substances approved at the latest on (…) [OP please insert the date of entry into force of this Regulation], approvals shall be deemed unlimited in time, except for: (a)active substances identified as candidates for substitution in accordance with Article 24; (b)active substances approved under Article 4(7); (c)active substances for which the submission of an application for renewal under Article 15(1) was required before [OP: please insert the date of entry into force of this Regulation] but was not submitted before the deadline referred to in Article 15(1); (d)active substances for which a procedure for the renewal of approval is ongoing on [OP: please insert the date of entry into force of this Regulation]. ***(e) active substances for which a limited period of approval is set, the length of which is to be recommended by the authority in accordance with Article 6 (j) in particular in the light of relevant uncertainties and critical areas of concern emerging from the risk assessment including as a result of data gaps and for substances with mutagenic, carcinogenic, or reprotoxic properties as well as endocrine disruptors that may cause adverse effects in humans and in non-target organisms.***

Reason
Same reason as for Amendment 4.

Amendment 11

linked to recommendation 1.10

Article 1(24) of COM(2025) 1030 final, modifying Article 40 of Regulation 1107/2009

Text proposed by the European Commission	**EESC amendment**
(24) Article 40 is replaced by the following: Article 40 Mutual recognition	(24) Article 40 is replaced by the following: Article 40 Mutual recognition

1. ***The holder of*** an authorisation granted in accordance with Article 29 ***may apply for an*** authorisation for the same plant protection product, the same use and under comparable agricultural practices ***in another*** Member State under the mutual recognition procedure***, provided for in this subsection, in the following cases:*** (a) ***the authorisation was granted by a Member State (reference Member State) which belongs to the same zone and the authorised plant protection product is placed on the market in the reference Member State;*** (b) ***the authorisation was granted by a Member State (reference Member State) which belongs to a different zone provided that the authorisation for which the application was made is not used for the purpose of mutual recognition in another Member State within the same zone and the authorised plant protection product is placed on the market in the reference Member State;*** ***(c)*** the authorisation was granted by a Member State for use in greenhouses, as post-harvest treatment, for treatment of empty rooms or containers used for storing plant or plant products, for seed treatment, for uses that are solely and explicitly needed in order to apply the provisions of Regulation (EU) 2016/2031 or for plant protection products containing as active substances only biocontrol active substances regardless of the zone to which the reference Member State belongs and the authorised plant protection product is placed on the market in the reference Member State.	1. ***When*** an authorisation ***for a PPP is*** granted ***to an applicant by a Member State*** in accordance with Article 29***, that*** authorisation for the same plant protection product, the same use and under comparable agricultural practices ***is automatically granted to all*** Member State***s of the same zone*** under the mutual recognition procedure***. By way of derogation, automatic mutual recognition is granted in the following cases:*** (a) the authorisation was granted by a Member State for use in greenhouses, as post-harvest treatment, for treatment of empty rooms or containers used for storing plant or plant products, for seed treatment, for uses that are solely and explicitly needed in order to apply the provisions of Regulation (EU) 2016/2031 or for plant protection products containing as active substances only biocontrol active substances regardless of the zone to which the reference Member State belongs and the authorised plant protection product is placed on the market in the reference Member State. (b) ***in the case of seed treatment, automatic mutual recognition will be granted if the plant protection product is authorised in at least one*** **Member State** ***for seed treatment in professional facilities.*** **(c)** ***in all cases, the minimal environmental and health standards to be respected should be the same in all Member States in order for this automatic mutual recognition to be granted.*** ***1 bis. In the case where a product has been approved for seed treatment in one country, it may be marketed in the other member states provided that the applicant specifies all member states that they wish to market their product under the same label while allowing Member States to restrict or refuse authorisation where justified by specific environmental or health conditions.***

Reason
Automatic mutual recognition

It is necessary to introduce a provision so that a product authorised in one Member State is automatically authorised in all countries within the same climatic zone. Introducing an automatic recognition mechanism for derogations granted by individual Member States would ensure: 1. **Greater regulatory coherence and a level playing field for farmers:** if a PPP is authorised in one Member State, there is no technical reason to impede farmers of other Member States to use such a PPP. 2. **Administrative simplification:** eliminating the need for the applicant to request authorisations in each Member State would reduce the bureaucratic burden for both national authorities and economic operators. **Rapid response to plant health emergencies:** automatic sharing of authorisations would allow timely and coordinated action, essential to prevent or contain the spread of transboundary plant diseases or infestations.

Amendment 12

linked to recommendation 1.10

Article 1(31) of COM(2025) 1030 final, modifying Article 46 of Regulation 1107/2009

Text proposed by the European Commission	EESC amendment
2. Where a Member State withdraws or amends an authorisation or does not renew it for other reasons than those referred to in paragraph 1, it may set a grace period that shall not exceed 6 months for the sale and the distribution and an additional maximum of 1 year for the disposal, storage, and use of existing stocks of the plant protection products concerned).’;	2. Where a Member State withdraws or amends an authorisation or does not renew it for other reasons than those referred to in paragraph 1, it may set a grace period that shall not exceed 6 months for the sale and the distribution and an additional maximum of 1 year for the disposal, storage, and use of existing stocks of the plant protection products concerned).’; ***It may set a grace period for at least two growing seasons for the sowing of treated seeds, taking into account the time of year when seeds are sown and when the commodities are harvested.***

Reason
Grace periods for sowing There is lack of clarity and consistency in current EU legislation regarding the use of seed stocks after the withdrawal of plant protection product (PPP) authorisations. As sowing and harvest timings vary across crops and Member States, the absence of defined grace periods creates uncertainty for seed companies and farmers.

Amendment 13

linked to recommendation 1.10

Article 1(32) of COM(2025) 1030 final, modifying Article 49 of Regulation 1107/2009,

Remove point 1 Article 49

Text proposed by the European Commission	EESC amendment
(32) Article 49 is replaced by the following:	**(32)** Article 49 is replaced by the following:

‘Article 49 Placing on the market of treated seeds and plant reproductive material ***1. The treatment of seeds and plant reproductive material with plant protection products as well as the sowing of the treated seeds and plant reproductive material constitutes a use of a plant protection product.***	‘Article 49 Placing on the market of treated seeds and plant reproductive material

Reason
This modification introduces more complexity for operators instead of simplification. Since the sowing of the treated seeds constitutes a use of a plant protection product, farmers who sow this seed, as well as sowing service companies, will be required to undergo training and certification on plant protection products and renew this training periodically. Furthermore, national authorities will be required to maintain official oversight. There is no real reason to modify the rules on this matter, and moreover, it does not simplify the current rules; on the contrary, it adds bureaucratic requirements for those involved in sowing.

Amendment 14

linked to recommendation 1.10

Article 1(32) of COM(2025) 1030 final, modifying Article 49 of Regulation 1107/2009

Text proposed by the European Commission	**EESC amendment**
6. Without prejudice to other Union legislation concerning the labelling of seeds and plant reproductive material, the label ***and*** documents accompanying the treated seeds and plant reproductive material shall include the name of the plant protection product with which they were treated, its authorisation number and the Member State which authorised it, the name(s) of the active substance(s) in that product, standard phrases for safety precautions as provided for in Regulation (EC) No 1272/2008 and, where applicable, risk mitigation measures set out in the authorisation for that product.	6. Without prejudice to other Union legislation concerning the labelling of seeds and plant reproductive material, the label ***or*** documents accompanying the treated seeds and plant reproductive material shall include the name of the plant protection product with which they were treated, its authorisation number and the Member State which authorised it, the name(s) of the active substance(s) in that product, standard phrases for safety precautions ***which are relevant for the treated seeds,*** as provided for in Regulation (EC) No 1272/2008 and, where applicable, risk mitigation measures ***relevant for the treated seeds*** set out in the authorisation for that product. ***Digital labelling on seed bags and plant reproductive material can be used.***

Reason
Explained in point 2.16.

Amendment 15

linked to recommendation 1.10

Amendment to Article 1 of COM(2025) 1030 final, modifying Regulation (EC) No 1107/2009
Paragraph (33a) is added to Article 1 of COM(2025) 1030

Text proposed by the European Commission	EESC amendment
	(33a). Article 53 is amended as follows: ***a. A new paragraph 1a is added:*** ***1a. Following the notification by the Member State requesting authorisation for a limited and controlled emergency use, the Commission shall adopt a decision, in accordance with the regulatory procedure referred to in Article 79(3), making the same derogation use automatically applicable in all Member States belonging to the same zone as the Member State requesting the authorisation, provided that they are also concerned by the same kind of limited and controlled emergency.*** ***b. paragraph 3 is replaced by the following:*** ***3. If necessary, the Commission shall supplement the decision referred to in paragraph 1a, based on the opinion of the Authority, as to when and under what conditions the Member States of the same climatic zone:*** ***(a) may or may not extend the duration of the measure or repeat it; or*** ***(b) shall withdraw or amend its measure.***

Reason
Automatic mutual recognition for emergency use Currently, derogations for the use of plant protection products not authorised in the EU under Article 53 of Regulation (EC) No 1107/2009 are granted on a case-by-case basis at the national level by Member States, even when it involves the same substance and similar agronomic situations. This fragmented approach leads to unequal treatment of farmers across the Union, creates competitive distortions in the internal market, and slows down the EU's effectiveness in responding to shared plant health emergency situations. Introducing an automatic recognition mechanism for derogations granted by an individual Member State would ensure: 1. Greater regulatory coherence: if a derogation is technically justified and accepted by the Commission for a specific agronomic and climatic context, there is no technical reason to deny its application in similar contexts in other Member States.

2. A level playing field for farmers: uniform application of derogations would prevent competitive imbalances between agricultural operators in different countries, safeguarding fairness within the single market. 3. Administrative simplification: eliminating the need for each Member State to initiate an individual procedure would reduce the bureaucratic burden for both national authorities and economic operators. 4. Rapid response to plant health emergencies: automatic sharing of derogations would enable timely and coordinated action, essential to preventing or containing the spread of transboundary plant diseases or infestations.

Amendment 16

linked to recommendation 1.17

Amendment to Article 5 of COM(2025) 1030 final, modifying Article 2 of Regulation (EC) No 1829/2003

Text proposed by the European Commission	EESC amendment
in Article 2, point (10), the following is added: 'Food and feed which are obtained using as production strains genetically modified micro-organisms within the meaning of Art 2(b) of Directive 2009/41/EC, with the exception of animal and plant cells in culture, are not food and feed 'produced from GMOs' where they do not contain those micro-organisms and, if they contain residues thereof, such residues are limited to non-viable cells, their presence is minimized through reasonable attempts to remove them in accordance with good manufacturing practice and they have no technological effect on the food or the feed.'.	in Article 2, point (10), the following is added: 'Food and feed which are obtained using as production strains genetically modified micro-organisms within the meaning of Art 2(b) of Directive 2009/41/EC, with the exception of animal and plant cells in culture ***or novel foods that intend to recreate animal products from GMMs***, are not food and feed 'produced from GMOs' where they do not contain those micro-organisms and, if they contain residues thereof, such residues are limited to non-viable cells, their presence is minimized through reasonable attempts to remove them in accordance with good manufacturing practice and they have no technological effect on the food or the feed.'.

Reason
The proposed text raises concerns regarding fermentation and the scope of the exemption from GMO legislation under Regulation (EC) No 1829/2003. Both Regulation 1829/2003 and the Commission's 2006 report refer to genetically modified micro-organisms used as processing aids (e.g. enzymes or additives). The Commission's proposed clarification, however, appears to broaden this concept to cover any GMO used in production. In fermentation processes for synthetic milk, GM micro-organisms are not processing aids but the actual producers of the final product. The product is therefore produced by GMOs, not merely with their support. Treating such uses as exempt would be comparable to authorising the marketing of milk produced by a genetically modified cow.

Brussels, 29April 2026.

The President of the European Economic and Social Committee
Séamus Boland