

Mandates of the Working Group on the rights of peasants and other people working in rural areas; the Special Rapporteur on the human right to a clean, healthy and sustainable environment; the Special Rapporteur on the right to food; the Special Rapporteur on the right of everyone to the enjoyment of the highest attainable standard of physical and mental health and the Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes

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(Please use this reference in your reply)

7 October 2026

Excellency,

We have the honour to address you in our capacities as Working Group on the rights of peasants and other people working in rural areas; Special Rapporteur on the human right to a clean, healthy and sustainable environment; Special Rapporteur on the right to food; Special Rapporteur on the right of everyone to the enjoyment of the highest attainable standard of physical and mental health and Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes, pursuant to Human Rights Council resolutions 54/9, 55/2, 58/10, 60/10 and 54/10.

We are independent human rights experts appointed and mandated by the United Nations Human Rights Council to report and advise on human rights issues from a thematic or country-specific perspective. We are sending this letter under the communications procedure of the Special Procedures of the United Nations Human Rights Council to seek clarification on information we have received. Special Procedures mechanisms can intervene directly with Governments and other stakeholders (including companies and international organizations) on allegations of abuses of human rights that come within their mandates by means of letters, which include urgent appeals, allegation letters, and other communications. The intervention may relate to a human rights violation that has already occurred, is ongoing, or which has a high risk of occurring. The process involves sending a letter to the actors presumably involved in the allegations, where the facts as reported to us are outlined, the applicable international human rights norms and standards explained, the concerns of the experts highlighted. The letter also contains a list of questions and requests for follow up action. Communications may deal with individual cases, general patterns and trends of human rights violations, cases affecting a particular group or community, or the content of draft or existing legislation and policy considered not to be fully compatible with international human rights standards.

In this connection, we would like to bring to the attention of the European Commission, the European Parliament and the Council of the European Union our **concerns regarding the Food and Feed Safety Simplification Omnibus package, and in particular the proposal for a Regulation amending, among others, Regulation (EC) No. 1107/2009 and Regulation (EU) No. 528/2012. We are concerned that these proposals will have a detrimental effect on the rights of**

Permanent Delegation of the European Union
to the United Nations Office
and other international organizations in Geneva

farmers, rural workers and their families, and harm the enjoyment of human rights to adequate food, health, and a safe and healthy environment.

According to the information received:

The Food and Feed Safety Omnibus forms part of the simplification package announced in the European Commission's Vision for Agriculture and Food (COM(2025) 75), and of the broader simplification agenda pursued in the context of its political priorities for 2024-2029 and the 2025 Single Market Strategy, which emphasize reducing administrative burdens, lowering costs and enhancing competitiveness while maintaining ambitions on climate, sustainability and social responsibility. Since February 2025, the Commission has tabled ten omnibus proposals, and the Food and Feed Safety Omnibus is the tenth, aimed to streamline and simplify existing legislation.

On 16 December 2025, the European Commission presented the Food and Feed Safety Omnibus, which was formally transmitted to the European Parliament and the Council of the European Union for consideration and negotiation. The package comprised a proposal for a Regulation amending ten existing Regulations (COM(2025) 1030 final), a proposal for a Directive (COM(2025) 1021 final), and a targeted proposal on data protection under Article 95 of the Biocidal Products Regulation.¹ The Regulation proposal covers a wide range of matters, including plant protection products, biocidal products, maximum residue levels, bovine spongiform encephalopathy, hygiene rules, fermentation products, feed additives, official controls and border controls.

Under the current framework, Regulation (EC) No. 1107/2009² aims to ensure a high level of protection of both human and animal health and the environment and is underpinned by the precautionary principle. The Regulation provides that particular attention should be paid to the protection of vulnerable groups of the population, including pregnant women, infants and children, and that industry should demonstrate that substances or products placed on the market have no harmful effect on human or animal health nor unacceptable effects on the environment. It also provides that the protection of human and animal health and the environment should take priority over the objective of increasing crop yield. Active substances are approved for limited periods, generally up to ten years for initial approvals and up to fifteen years for renewals, with shorter periods for substitution and derogations candidates. Renewal procedures require updated dossiers incorporating independent scientific studies and experience gained from actual use.

Biocidal products are regulated under the Regulation (EU) 528/2012 (BPR),³ which aims to improve the functioning of the internal market through the harmonisation of the rules on the making available on the market and the use of biocidal products, whilst ensuring a high level of protection of both human and animal health and the environment. As with plant protection products, this Regulation operates a two-tier system: the active substances contained in

¹ https://eur-lex.europa.eu/procedure/EN/2025_410.

² <https://eur-lex.europa.eu/eli/reg/2009/1107/oj/eng>.

³ <https://eur-lex.europa.eu/eli/reg/2012/528/oj/eng>.

biocidal products must be approved at Union level, and the biocidal product itself must be authorised, either by the competent authority of a Member State or at Union level, before it may be made available on the market or used.

Despite reported shortfalls of these Regulations, such as gaps in data quality, long-term neurotoxicity testing, cocktail effects, and non-target organism assessment, they are considered to be important foundations and safeguards for protecting human health, including farmers and rural workers who are exposed to them, and the environment from pesticides exposure.

Rather than addressing the existent weaknesses, the Omnibus proposal allegedly leaves them unaddressed, while dismantling core safeguards of the current approval system. In particular, we have received the following **substantive concerns** that require urgent attention.

First, the Omnibus package would make unlimited approvals for most pesticide active substances the default rule, thereby abolishing or severely limiting the mandatory periodic re-evaluation and the renewal process that currently enables regulators to consider the latest scientific evidence and experience. Exceptions would be confined to certain categories of substances, while all other active ingredients approved at the time of entry into force would automatically benefit from unlimited approvals.

Such amendments allegedly contradict the established scientific experience that shows that periodic reviews have been essential in practice to uncover previously unreported or underestimated risks and to remove harmful substances from the market. Periodic reviews have reportedly strengthened the protection of human health and environmental protection by uncovering risks of pesticides that were previously unreported by the relevant pesticide producers. For example, renewal procedures contributed to the non-renewal of approval of numerous toxic active substances, including chlorpyrifos, mancozeb and chlorothalonil, after new evidence emerged regarding developmental neurotoxicity, reproductive toxicity, endocrine disruption, carcinogenicity, groundwater contamination and ecological impacts. These cases demonstrate that, absent time-limited approvals and periodic reassessment, hazardous pesticides may remain on the market, harming humans and polluting the environment, despite evolving scientific knowledge.

In an independent assessment of the Omnibus package, commissioned by the Dutch Parliament, scientists stressed that “if periodic re-evaluation is abolished, there is a good chance that substances that have harmful effects on the environment and health in the case of long-term exposure will remain on the market... This change therefore poses significant risks to sustainability and to the level of protection of human and environmental health”.⁴ Another assessment, by a civil society organization,⁵ identified active ingredients whose approval has been recently renewed and whose approval period will automatically become unlimited upon the entry into force of the Omnibus

⁴ Jonge Akademie, KNAW, NWO, TNO, UMCNL, UNL and VH, [Scientist's impact assessment of EU-proposal Food and animal safety simplification package \(focused on plant protection products\)](#), 17 April 2026.

⁵ Générations Futures, <https://www.generations-futures.fr/actualites/omnibus-pesticides-illimitees/>, February 2026.

proposals. Reportedly, 49 synthetic substances, including glyphosate and acetamiprid, would thus benefit an automatic unlimited approval, with no evaluation providing scientific support for this authorisation decision.

Second, the Food and Feed Safety Omnibus would extend grace periods for the sale and use of pesticide products, including those withdrawn for reasons related to health or environmental protection, from a maximum of 18 months under the current regime to up to three years where there are no other available reasonable means. Under Regulation 1107/2009, grace periods are limited and may not apply when products are withdrawn for safety reasons. By contrast, the proposed changes would allow the continued sale and use of existing stocks of products, even when they have been identified as hazardous, prolonging exposure for farmers, agricultural workers, residents of rural areas and other populations.

Third, Omnibus would broaden the conditions for derogations under Article 4(7) of Regulation (EC) No. 1107/2009. At present, derogations may be granted on a time-limited basis for substances deemed necessary to control a serious danger to plant health when such danger cannot be contained by other reasonable means, including non-chemical methods. The proposed amendment would add “or plant production” as a ground, thereby allowing derogations to be justified by productivity considerations and potentially making it easier to authorise or maintain on the market highly hazardous substances, including certain carcinogenic, mutagenic, reprotoxic or endocrine-disrupting chemicals, even when they do not meet the safety approval criteria. The proposal to extend grace periods to three years and to ease the approval by derogation of hazardous pesticides that do not meet the safety criteria will increase risks for farmers, rural workers, their families, and rural residents.

Fourth, the proposal would constrain the ability of EU Member States, in their national authorisation procedures, to rely on the latest scientific and technical knowledge when assessing products. The information received suggests that Member States would be required to base their decisions primarily on the last EU-level assessment of the active substance rather than on updated independent scientific evidence, and that requests for further EU-level reviews would involve burdensome processes and delays. This would reduce Member States’ margin of appreciation to respond promptly to new evidence and local circumstances, including evidence of harms affecting peasants and other people working in rural areas.

Similar changes are reportedly envisaged in the framework for biocidal products and that a substantial proportion of biocidal products on the EU market has not yet been assessed against the safety and efficacy criteria of the Biocidal Products Regulation due to delays. Removing the requirement for periodic renewal would further reduce the level of protection for human health and the environment in relation to biocides.

Further concerns indicate that the proposal would weaken the regulatory feedback loop at both ends: risks associated with pesticides and biocides would no longer reliably enter the assessment, and identified risks would no longer be promptly removed from the market. The independent impact assessment

conducted for the Dutch Parliament notes that if the proposals for risk-based reviews are implemented, “the burden of proof will be shifted from substance producers to governments or other parties (to whom is not clear). In a review, it is then no longer the producer who must demonstrate that substances are safe, but others who need to demonstrate that substances are not safe. This is against the precautionary principle, embedded in the current system, and thus a fundamentally different approach”.⁶ On the intended simplification of authorisation, the independent scientists have cautioned that the new process “certainly does not simplify admissions or the administrative burdens”.⁷

Furthermore, the proposals are reportedly difficult to reconcile with the high level of protection mandated by Article 191(2) of the Treaty on the Functioning of the European Union, the precautionary principle and relevant provisions of the Charter of Fundamental Rights of the European Union.

In addition to the above, we have received the following **procedural concerns**, highlighting that under the Treaty on European Union and the 2016 Institutional Agreement on Better Law-Making and the Better Regulation Guidelines, the European Commission is expected to ensure evidence-based and participatory decision making.

First, the Food and Feed Safety Omnibus has allegedly been considered without a full Better Regulation impact assessment on human rights, public health and the environment. Instead, it is alleged that the formulation of the proposal relied on an analytical staff working document. Scientists from numerous European research institutions, child-rights and youth organisations, civil society organisations, trade unions and farmers’ organisations reportedly expressed concern that the analytical staff working document does not provide a structured and quantitative assessment commensurate with the scale of the proposed reforms and does not transparently compare less intrusive alternatives.

In June 2026, scientists from 27 European research institutions issued a clear warning against the Food and Feed Safety Omnibus proposal, criticising the decision of the Commission that a formal impact assessment was unnecessary and stating that: “Such a process that sidelines scientific evidence, public concern, and established law-making principles risks undermining public trust.”⁸

Second, the call for evidence and related consultations conducted in 2025 are said to have revealed strong opposition to unlimited approvals and to the weakening of pesticide legislation. It is alleged that these concerns were not adequately reflected in the proposal, nor accompanied by a clear justification as to why the European Commission considered that the desired simplification and acceleration objectives justified the associated reduction in protection levels.

⁶ Jonge Akademie, KNAW, NWO, TNO, UMCNL, UNL and VH, [Scientist’s impact assessment of EU-proposal Food and animal safety simplification package \(focused on plant protection products\)](#), April 2026.

⁷ Ibid.

⁸ Wintermantel D. *et al.*, EU Omnibus proposal increases pesticide risks, *Science*, June 2026.

Third, the legislative process has reportedly been characterised by very limited participation of concerned individuals, communities and civil society organisations representing farmers and rural workers, whereas industry representatives had multiple discussions with key actors in the drafting and negotiation of the proposal.

These aspects raise questions regarding the alignment of the process with international human rights norms on meaningful and informed public participation, the right to access information and the obligation to ensure evidence-based, transparent and inclusive decision-making.

While we do not wish to prejudge the accuracy of the information received, we are concerned that the Food and Feed Safety Simplification Omnibus package may weaken key safeguards in the EU regulatory framework, such as time-limited approvals, periodic reviews, strict conditions for grace periods and derogations, and requirements to use the latest scientific evidence, thus having the detrimental effect of increasing and prolonging exposure of farmers, agricultural workers and rural communities to hazardous substances. We are further concerned that this may adversely affect the enjoyment of the rights to life, to health, to food and to healthy and safe environment.

We would like to recall that article 6 of the International Covenant on Civil and Political Rights protects the right to life, while article 12 of the International Covenant on Economic, Social and Cultural Rights recognizes the right of everyone to the enjoyment of the highest attainable standard of physical and mental health. The Committee on Economic, Social and Cultural Rights has clarified that the right to health extends to its underlying determinants, including an adequate supply of safe food and healthy occupational and environmental conditions, and requires measures to prevent and reduce exposure to harmful chemicals. Article 11 of the Covenant further recognizes the right to adequate food, which requires food to be safe and free from adverse substances. We would also like to recall that the United Nations General Assembly, in resolution 76/300, recognized the human right to a clean, healthy and sustainable environment. A non-toxic environment has been identified as one of the substantive elements of this right. We would also like to recall that the right to enjoy the benefits of scientific progress and its applications, including scientific knowledge, by everyone and without discrimination, is recognized in article 15 of the International Covenant on Economic, Social and Cultural Rights.

Furthermore, we would like to highlight a recommendation made by the former Special Rapporteur on the right of everyone to the enjoyment of the highest attainable standard of physical and mental health to “[a]dvance both human and planetary health and ensure that current food systems do not compromise the ability of current and future generations to secure their own rights to food, health and livelihoods”. She further stressed that “States must also promote the conservation, protection and restoration of the health and integrity of the planet’s ecosystems, including through sustainable healthy food production and consumption based on ecologically sound methods within planetary boundaries, while ensuring resilience to future crises, including those caused by conflict, pandemics and climate change” (A/78/185, para. 97 (l)).

In relation specifically to peasants and other people working in rural areas, the UN Declaration on the rights of peasants and other people working in rural areas (UNDROP) recognizes their right not to use or be exposed to hazardous substances or toxic chemicals, including agrochemicals and agricultural pollutants (article 14(2)); right to adequate food (article 15); right to the conservation and protection of the environment and to a safe, clean and healthy environment (article 18); to the enjoyment of the highest attainable standard of physical and mental health (article 23); and to active and free participation in decision-making (article 10). Weakening safeguards in pesticide regulation without simultaneously strengthening support for safe and sustainable agricultural models could reinforce dependence of farmers on hazardous substances, expose them and rural workers to greater health risks and perpetuate environmental degradation affecting their lands, waters and ecosystems. Farmers, agricultural workers and rural residents, especially women, are among the populations most exposed to pesticides, through occupational exposure, take-home contamination, household dust and environmental pathways such as air, water and soil.

Children living in rural areas, including children of farmers and agricultural workers, are especially exposed to foreseeable harm arising from environmental degradation and exposure to toxic substances. With regard to the impact on children, article 3(1) of the Convention on the Rights of the Child requires that their best interests be a primary consideration in all actions concerning them, while article 24 recognizes their right to the highest attainable standard of health and specifically requires States to take into consideration the dangers and risks of environmental pollution. The Committee on the Rights of the Child has further emphasized that children's best interests must be a primary consideration in environmental decisions, including legislation, regulations and policies.

We are further concerned that the proposed measures appear to lower protection levels, make it more difficult to remove hazardous substances from the market once risks are identified, and limit the ability of Member States to take into account the latest independent scientific evidence when authorising or reviewing products. Such changes seem difficult to reconcile with the precautionary principle and with obligations to respect, protect and fulfil human rights, including the rights of peasants and other people working in rural areas.

The information received also suggests that the proposed measures may be inconsistent with the principle of non-retrogression in human rights and environmental law, which requires that existing levels of protection should not be diminished without compelling justification and strict safeguards. In this regard, the Committee on Economic, Social and Cultural Rights has stated, in its general comment No. 14, that there is a strong presumption that retrogressive measures in relation to the right to health are not permissible, and that any such measures require the most careful consideration of all alternatives and must be duly justified. By relaxing renewal obligations, extending grace periods for hazardous products, facilitating derogations based on plant production and limiting the use of updated scientific evidence, the Omnibus package may amount to retrogressive measures affecting the enjoyment of economic, social and cultural rights, including the rights to health, adequate food and water, and an adequate standard of living.

We are also concerned by information indicating that the legislative process has proceeded without a full impact assessment on human rights and the environment and without meaningful participation of potentially affected individuals and communities, including farmers, rural workers and their representative organisations. These concerns are also relevant in the context of articles 10, 11 and 15 of UNDROP, which protect the rights of peasants and other people working in rural areas to active and free participation in decision-making processes affecting their lives, land, food and agriculture policy, and livelihoods and to access relevant and timely information. As elaborated in the report of the Special Rapporteur on the human right to a clean, healthy and sustainable environment (A/80/187), States have binding obligations under international law to protect the environment and the climate system, including the duty to prevent foreseeable harms to people and ecosystems. To comply with this duty, States must carry out Environmental, Social, and Human Rights Impact Assessments for all activities and projects with the potential to worsen the triple planetary crises of climate change, biodiversity loss and pollution, considering increasing risks created.

As it is our responsibility, under the mandates provided to us by the Human Rights Council, to seek to clarify all cases brought to our attention, we would be grateful for your observations on the following matters:

1. Please provide any additional information and/or comment(s) you may have on the above-mentioned analysis.
2. Please provide detailed information on the current status of the Food and Feed Safety Omnibus proposal, including the legislative timetable, any amendments proposed or adopted by the European Parliament or Council, and any plans to revise the provisions relating to pesticides and biocides.
3. Please explain how the European Commission and the co-legislators have ensured, or intend to ensure, that the proposed amendments to Regulation (EC) No. 1107/2009 and Regulation (EU) No. 528/2012 do not result in a lowering of the level of protection of human health and the environment, particularly for farmers, agricultural workers and rural communities, and how these amendments are compatible with the precautionary principle.
4. Please indicate whether a comprehensive impact assessment has been, or will be, conducted in relation to the Omnibus package, including an assessment of (a) the potential short- and long-term impacts on human health and the environment of removing time-limited approvals and periodic reviews; (b) the implications of extended grace periods and broadened derogations for hazardous substances; and (c) the distributional impacts on farmers, rural workers and children in rural areas, including gender-specific impacts.
5. Please describe the measures taken to ensure meaningful and informed participation of farmers and other rural workers, their representative organisations, and civil society, scientific actors, environmental organizations in the design, assessment and negotiation of the omnibus

package, including any consultations focused specifically on the human rights implications of the proposed changes.

6. Please clarify how the proposal, and any subsequent amendments, have been assessed for conformity with the European Union's and its Member States' obligations under international human rights law, including UNDROP, the International Covenant on Economic, Social and Cultural Rights and the Convention on the Rights of the Child, as well as with EU treaty obligations and the Charter of Fundamental Rights of the European Union.
7. Please indicate what steps are being taken to ensure that farmers, agricultural workers and rural communities in the European Union are effectively protected from harmful exposure to pesticides and biocides, including through monitoring, health surveillance, access to information, training, and support for agro-ecological and other sustainable farming practices.

This communication, as a comment on pending or recently adopted legislation, regulations or policies, and any response received, will be made public via the communications reporting [website](#) after 48 hours. They will also subsequently be made available in the usual report to be presented to the Human Rights Council.

Please accept, Excellency, the assurances of our highest consideration.

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