



Brussels, 16 March 2026

To: EU Agriculture Ministers

EU omnibus processes: Health call to uphold public interest and science, including for the regulation of pesticides

Dear Minister,

You are currently considering the Food and Feed Safety Omnibus proposal put forward by the EU Commission.

The Health and Environment Alliance (HEAL), an alliance of over 70 member organisations working for better health through a healthier environment, has great concerns that these omnibus processes lead to a weakening of key health protective environmental laws, including for the Food and Feed Safety Omnibus presented in December 2025.

Accounting for and urgently reducing the health cost of pollution

People's health in the EU is threatened like never before from the triple crisis of climate change, biodiversity loss, and pollution. Exposure to air, chemical and pesticide pollution is a key risk factor for chronic diseases including cancer, heart and respiratory disease, as well as neurological diseases. The current focus on reducing administrative costs and burden to industry in the omnibus processes is a narrow and very short-term perspective, and in the absence of thorough regulatory impact assessments lacks the proper accounting of the unacceptably high health costs.

The omnibuses on chemicals and food and feed safety include proposals which would lead to increased exposure of adults and children to health-harming chemicals and pesticides. In the case of pesticides, doubling the time for which health-harming substances are still allowed on the market (for three years following the non-renewal of the authorisation) unnecessarily puts people at risk and would lead to increased costs. [It is estimated](#) that in 2017 alone, the societal costs – including health costs – directly attributable to pesticides were approximately €2.3 billion.

Upholding evidence-based policymaking and science uptake

Impact assessments are a cornerstone of the EU's Better Regulation principles and EU primary law, and independent science is key to these assessments.

HEAL is greatly concerned about the fast-tracking of omnibus procedures, including the omnibus on food and feed safety, without an impact assessment which would consider health cost and benefits. In the absence of proper impact assessments, co-legislators do not have enough information to make evidence-based decisions.

Specifically, the proposal for the food and feed safety omnibus would lead to member states being severely limited in taking into account the latest independent science when authorising pesticide products, as they would be expected to rely on latest EU-level assessments. To avoid risks to human health, it is crucial that member states retain their competence to make decisions based on the latest scientific information.

The foreseen granting of unlimited approvals to active substances in pesticides by default (with only limited exemptions) would undermine evidence-based policymaking. The current regular review every 10-15 years is essential to adequately consider new evidence and promote safer alternatives. Without it, pesticides causing serious harm to human health, such as chlorpyrifos, a pesticide that has harmful effects on children's brain development, would still be on the EU market.

Ensuring civil society involvement and transparency

The fast-tracking of omnibus proposals severely restricts expertise input by civil society and feedback from the wider public. Thus, the EU undermines its own credibility as a transparent policymaker and its commitments to Better Regulation. These concerns were shared by the European Ombudswoman, who in a November 2025 recommendation [found maladministration](#) in how the Commission prepared urgent legislative proposals.

The EU legislative framework on the environment includes key instruments to reduce the existing disease burden and prevent further harm. Instead of trying to weaken the existing health protective framework, the EU Commission should step up on the implementation and enforcement of existing legislation as part of upholding public interest.

Please see here for [HEAL's overall concerns regarding the omnibus procedure](#).

Yours sincerely,

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Health and Environment Alliance (HEAL)

On behalf of:

Association of European Cancer Leagues (ECL)
Child Rights International Network (CRIN)
European Federation of Allergy and Airways Diseases Patients' Associations (EFA)

Armenian Women for Health and Healthy Environment, Armenia
Association France Parkinson, France
Associazione Culturale Pediatri, Italy
Bond Beter Leefmilieu, Belgium
Canopea, Belgium
France Nature Environnement, France
Génération Futures, France
Institute for Health and Environment, Slovenia
International Society of Doctors for Environment, Italy
Kom op tegen Kanker, Belgium
La Mutuelle Familiale, France
Mutualité chrétienne - Christelijke mutualiteit, Belgium
Mutualités Libres – Onafhankelijke Ziekenfondsen, Belgium
Mutuelles pour la santé planétaire, France
Natuur & Milieu, The Netherlands

Parkinson Vereniging Netherlands, The Netherlands
Portuguese Society of Environmental Health, Portugal
Salud por Derecho, Spain
Women Engage for a Common Future (WECF), Germany
Women Engage for a Common Future (WECF), France
Wen (Women's Environmental Network), UK

We are the Health and Environment Alliance, also known as HEAL. We work to ensure that health evidence and health voices are heard by policymakers. We raise awareness on how the environment impacts our health. We shape laws and policies to promote planetary and human health and protect those most affected by pollution.

We are the leading not-for-profit organisation addressing how our environment affects health in the European Union and beyond. Supported by over 70 member organisations, HEAL brings independent and expert scientific evidence from the health community to European and global decision-making processes to inspire disease prevention strategies and to promote a toxic-free, low-carbon, fair and healthy future.

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