

CropLife Europe Position on the EFSA Strategy on Specific Protection Goals for Non-Target Terrestrial Organisms

In June 2024, the European Commission mandated the European Food Safety Authority (EFSA) to come up with a proposal for Specific Protection Goals (SPGs) for Non-Target Terrestrial Organisms (NTTOs) as part of the development of a new Guidance document on indirect effects on biodiversity¹ and the review of the Terrestrial Ecotoxicology Guidance document². An SPG defines the boundaries within which the use of a plant protection product (PPP) can be considered safe for the environment. PPPs can only be sold if the use causes no unacceptable effects on the environment³. The mandate by the European Commission is looking to develop SPGs for insects (non-target arthropods (NTAs)), soil organisms like earthworms, and plants (non-target terrestrial plants (NTTPs)). On 23 June 2025 EFSA published its strategy to come to an SPG proposal⁴.

However, the EFSA Strategy is not fully aligned with the mandate of the Commission and Regulation (EC) 1107/2009 concerning the placing of plant protection products on the market. The chosen approach is too conservative, neglecting to consider the context of agriculture and the benefits of pesticide use to produce food, feed and other agricultural products.

This conservatism will lead to an SPG proposal that limits the possibilities of Member States and the Commission to manage PPPs risks to acceptable levels. Registering pesticides, in particular insecticides, will become nearly impossible. This will further reduce farmers access to the products they need to protect their crops against pests, weeds and diseases.

EFSA has indicated that it will develop its SPG proposal in the upcoming months and stakeholders will be further involved in 2026. To ensure the EFSA SPG proposal supports proportionate risk management, as mandated by the Commission, CropLife Europe believes EFSA must consider the following:

- **The primary function of agricultural ecosystems is agricultural production.** In the SPG Strategy EFSA prioritises environmental protection over agricultural production in agricultural fields. This limits the possibility for risk managers to weigh environmental risks against social and economic benefits, such as the provision of food, feed and other agricultural products. This limited scope can negatively impact agricultural production, but also the environmental protection to which EFSA aims to contribute. A reduction in production can increase demand for land, thus impacting biodiversity conservation and restoration, since land-use change is an important driver of biodiversity loss. EFSA should therefore consider the potential impact of SPGs on agricultural production.
- **The agricultural context in which plant protection products are used can affect the acceptability of pesticide risks.** In the current strategy, EFSA does not consider the effects of other tools and practices used in farmers' integrated crop management (ICM). This leads to disproportionate SPGs for PPPs. Practices such as crop rotation, soil management, fertilisation, irrigation and harvesting can all have effects on the environment even bigger than the effects of pesticide use. If the PPP risk is small

¹ SANTE.E.4/SH/gb(2024)5043290 Request to EFSA to develop a guidance to assess potential indirect effects on biodiversity via trophic interactions under agro-environmental conditions

² SANTE.E.4/SH/et(2024)5040527 Request to EFSA to review the Guidance Document on Terrestrial Ecotoxicology

³ 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

⁴ EFSA, 2025. Analysis of the evidence to support the definition of specific protection goals for terrestrial organisms— Part 1: Proposed strategy. <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2025.9501>

compared to the risk of other tools and practices, this risk can be deemed to be more acceptable. The risk manager should, therefore, be able to consider the context in which pesticides are used when deciding on the acceptability of risks. This should be reflected in the proposed SPGs, especially for the assessment of risks in the field or the field margin.

- **The negative environmental effects of alternatives to plant protection products use can affect the acceptability of plant protection products' risks.** Alternatives to pesticides, such as chemical, biological, mechanical, and physical alternatives, come with their own effects, sometimes bigger than the effect of the assessed pesticide. The Commission '*Vision on the Future of Agriculture and Food*' is ambitious when it comes to providing alternatives to PPPs as it aims to prevent future pesticide bans in the absence of an alternative control measure. This should not lead to worse environmental effects than pesticide use. Risk managers must be able to include the effects of alternatives in the decision on the acceptability of environmental risks. This must therefore be reflected in the proposed SPGs.
- **Alternatives to biodiversity conservation and restoration can affect the acceptability of plant protection products risks.** Regulation 1107/2009 aims to prevent unacceptable effects of pesticides on the environment aiming to contribute to biodiversity conservation and restoration. However, managing pesticide pollution is only one of the options to manage biodiversity. Providing suitable habitats, mitigating climate change, reducing exploitation, or protection against competing invasive species are often more effective alternative measures to support biodiversity. These are covered through the extensive EU biodiversity conservation and restoration policy and regulatory framework. A risk manager can find PPP use risks acceptable if other on- or off-farm biodiversity measures, such as providing flowering strips or other suitable habitats, are in place to ensure that biodiversity goals are reached. Risk managers must therefore be able to consider alternative measures when assessing the acceptability of a pesticide risk.

Medium to large in-field effects on non-target terrestrial organisms are a given in agriculture. The EFSA SPG strategy proposes that small (10-35%) effects are acceptable for NTA populations in agricultural fields. For insecticides, this conflicts with Regulation (EC) 1107/2009 concerning the placing of plant protection products on the market, which requires a high pesticide efficacy on insects in the field and creates conditions that are nearly impossible to meet. This would lead to a loss of most insecticides, biological and chemical, and impact the availability of fungicides and certain herbicides as well.

- **Recovery is inherent to highly disturbed agricultural ecosystems.** In the SPG Strategy EFSA only allows PPP effects for a very short time, which basically excludes the possibility for recovery in-field or due to migration from off-field areas. Since agricultural habitats are characterised by high levels of disturbance, recovery and recolonisation are important features of species that typically live in such habitats. Therefore, recovery of any potentially pesticide-affected populations will take place, the speed of which will vary dependent on both on- and off-farm biodiversity management. Risk managers should be able to consider this in their acceptability assessment. The concept of recovery should therefore be included in the in-field and off-field assessment as was also explicitly stated in the Commission mandate.
- **The health of agricultural ecosystems depends on the functional group.** The current EFSA proposal focusses on protecting populations of species, which ignores the fact that different species can perform the same function. The protection of all populations of all species in the agricultural field is therefore unnecessarily conservative since not all species are necessary to perform required functions such as pollination, natural pest control or soil functioning in agricultural ecosystems. The functional group should therefore be the focus when setting SPGs for in-field effects.
- **Pest control by any means leads to indirect effects.** Indirect effects from direct effects on insects (NTAs) and soil organisms in the field should be excluded. Controlling insect pests by any means (e.g. by using nets, growing more resistant varieties or introducing natural pest predators or insecticides) will automatically negatively influence the predators of these pests and thus cause indirect effects. This is inevitable to agriculture and therefore such indirect effects should not be considered within SPG setting. For weeds in the field, an in-field SPG was excluded by EFSA, as mandated by the European Commission, following the line of argumentation that weed control in the field is inevitable to guarantee food production. This should also be considered for insects.
- **Simplification of the plant protection products regulatory framework can support farmers' access to pesticides.** The current regulatory framework for PPPs, including existing EFSA guidance's, is

extremely complex and becoming almost impossible to handle for pesticide manufacturers, regulatory authorities, risk managers and end users. The inclusion of indirect effects and highly conservative SPGs will only add complexity and further reduce farmers' access to the pesticide tools that they need. The proposed SPGs and regulatory guidance for safe use should therefore be aligned with and contribute to the simplification agenda of the European Commission.

The considerations summarised above are detailed in the documents attached to this position:

- Technical review document of the EFSA SPG Strategy document
- Technical two-pagers on NTA's, NTTPs, Soil and Indirect Effects pesticide environmental SPGs and risk assessment methodologies
- Position on principles for the acceptability assessment of pesticide environmental risks