POSITION PAPER
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Food and Feed Safety Omnibus: Turning simplification into real change for Europe's farmers

Keep MRL decisions science- and risk-based: Consumer risk assessment must remain the basis for Maximum Residue Level decisions, supported by robust assessment of wider food-security, competitiveness and trade impacts before regulatory action is taken.

Protect investment in innovation: Predictable and effective regulatory data protection is essential to sustain investment in the scientific studies required to develop and maintain crop protection solutions in Europe.

Make simplification deliver in practice: Faster access to innovation, meaningful mutual recognition, consideration of real agronomic needs and evidence-led reassessment can make the regulatory framework more efficient while maintaining high safety standards.

The European Parliament amendments demonstrate significant support for making the EU crop-protection framework more efficient and responsive to farmers' needs. As the Parliament position develops, there is an opportunity to preserve this ambition while ensuring that simplification in one area does not create new barriers elsewhere.

Keep MRL decisions science- and risk-based

EU Maximum Residue Levels under Regulation (EC) No 396/2005 effectively protect consumers while providing predictability for farmers, food businesses and trading partners.

CropLife Europe remains concerned by proposals that would allow MRLs to be lowered because of the hazard properties or EU approval status of an active substance rather than demonstrated consumer risk. These proposals would not increase consumer protection, while adding red tape, disrupting established supply chains and creating unnecessary trade friction.

CropLife Europe supports maintaining consumer risk assessment as the basis for MRL decisions and workable import tolerances where a third-country use is demonstrated to be safe for European consumers. Assessment should take place before regulatory action, not after supply chains have already been affected and should consider food and feed availability, import dependency, competitiveness and the EU's international obligations. Farmers' competitiveness is best supported by predictable, science- and risk-based regulation alongside access to a wide, innovative, diverse crop protection toolbox.

Protect investment through effective regulatory data protection

Developing the studies required to demonstrate the safety and efficacy of crop-protection solutions requires significant investment. A single EU-wide protection period starting from the first authorisation under Regulation (EC) No 1107/2009 would shorten effective protection in later-authorising Member States, weakening incentives for R&D investments in Europe and ultimately putting future availability of innovative tools for farmers at risk.

CropLife Europe supports maintaining the current framework and preserving meaningful and effective protection where protected studies are required. Simplification should make data protection easier to administer and not make effective protection shorter.

CropLife Europe aisbl | 9 Rue Guimard | 1040 Brussels | Belgium | BE 0447 618 871 Register of Legal Persons
Francophone Section of the Business Court of Brussels | croplifeeurope@croplifeeurope.eu | www.croplifeeurope.eu
Tel: +32 2 663 15 50 | EU Transparency Register ID No.0711626572-26

Accelerate innovation across the full toolbox

CropLife Europe strongly supports faster access to biocontrol solutions and a broad, future-proof definition capable of accommodating current and emerging technologies, without automatically limiting biocontrol to substances meeting the separate low-risk criteria.

Biological and conventional solutions are complementary. Simplification measures addressing procedural bottlenecks should not be unnecessarily limited by technology type, nor should faster treatment of one category create additional delays elsewhere in the system. Growing agronomic pressures, including those associated with climate change, reinforce farmers' need for faster access to innovative solutions. To provide meaningful improvements to the farmers' crop protection toolbox, accelerating the innovation pipeline should be technology-agnostic rather than giving one technology preferential treatment at the cost of slowing down another.

Make the system work in practice for farmers

Repeated national procedures continue to delay access to products already assessed elsewhere in the EU. Greater reliance on assessments undertaken by another Member State can reduce unnecessary duplication while preserving the ability to address genuinely relevant local differences, rather than routinely reopening assessments already completed elsewhere. CropLife Europe supports stronger and more predictable mutual recognition where uses and relevant agronomic conditions are comparable, alongside reduced duplication of applications and assessments.

Decisions reflecting real agronomic needs

Where an important crop protection solution may be lost, assessment of alternatives should reflect farming reality including efficacy, scalability, yield and economic impacts, operational feasibility and resistance management.

CropLife Europe supports a structured agronomic assessment and a workable, evidence-based Article 4(7) process for situations involving serious crop protection needs. An alternative needs to work in practice, not simply on paper.

Where an authorisation is withdrawn or not renewed, farmers and supply chains need sufficient time to adapt, particularly where alternative solutions are not yet available in practice. CropLife Europe supports predictable and proportionate grace periods, unless immediate and serious safety concerns require faster withdrawal. This helps avoid unnecessary disruption while maintaining the ability to act swiftly where justified.

Regulatory resources focused where the science requires them

Regulatory resources should be concentrated where new scientific evidence indicates that further assessment is necessary, rather than automatically repeating comprehensive assessments of information already reviewed. Moving from calendar-driven reassessment to evidence-triggered reviews can strengthen both efficiency and safety, enabling authorities to react faster and focus directly on the scientific concern as soon as new evidence emerges.

CropLife Europe supports an evidence-led approach in which reassessment is triggered by relevant new scientific evidence; targeted reassessment focuses on the scientific issue that triggered the review; and additional data requirements remain proportionate to that issue, while wider reassessment remains possible where the evidence justifies it.

Turning simplification into outcomes

The Food and Feed Safety Omnibus provides an opportunity to improve regulatory efficiency while maintaining Europe's high safety standards.

A strong final framework would keep MRL decisions risk-based, protect investment in innovation, accelerate access to the full crop-protection toolbox and focus regulatory resources where they add the greatest value.