



EurEau

Brussels, 21 November 2025

To:

Ms. Jessika Roswall

Commissioner for Environment, Water Resilience and a Competitive Circular Economy

European Commission

Rue de la Loi 200

1049 Brussels, Belgium

Re: Protect drinking water resources in the forthcoming Omnibus on food and feed safety

Dear Commissioner Roswall,

The European Water Resilience Strategy, published in June 2025, recognises that **'water resilience is a matter of security and crisis preparedness for the EU.'** It goes on to say that **'urgent action is needed to tackle pollutants which pose a risk to our vital sources of drinking water.'**

Pesticides and their metabolites are widespread in drinking water resources across the EU, sometimes in concentrations above 0.1 µg/L. Drinking water suppliers must treat the raw water until it meets the stringent requirements of the Drinking Water Directive and they must assume the cost for doing so. This not only has an impact on the affordability of water services for private households and local businesses. It also reduces their capacity to invest in water resilience-related measures, including network maintenance.

The DG SANTE draft proposal for an **Omnibus regulation on Food and Feed Safety**, in interservice consultation until 24 November 2025, would reduce the level of protection of drinking water resources and lead to additional burdens for drinking water suppliers.

- ~ DG SANTE proposes open-ended approval periods, whereas active pesticide substances currently need to be re-assessed every 10 to 15 years to take account of the latest scientific knowledge and new data requirements. This periodic review system is a prerequisite to identifying and phasing out the most hazardous pesticides. Without periodic assessment, hazardous substances such as tolylfluanid, chlorpyrifos, mancozeb, thiacloprid, and flufenacet would not have been banned in the past.



- ~ DG SANTE wants to remove the obligation for Member States to use the most up-to-date scientific knowledge when assessing product authorisations. National authorities could then choose to ignore current scientific knowledge, instead limiting themselves to considering only the evidence available at the time of the original application for EU authorisation. This would represent a departure from science-based policymaking and contradict the European Court of Justice rulings in the cases C-308/22, C-309/22 and C-310/22 (2024).
- ~ Finally, DG SANTE suggests long grace periods following a ban: two years for sales and an extra year for use. This would substantially extend the use of substances that are proven hazardous with negative knock-on effect for drinking water resources.

Weakening the pesticide approval system will bring substantial risks to drinking water suppliers. If new scientific knowledge suggests that a pesticide metabolite should be considered as relevant in drinking water, national governments may oblige water suppliers to comply with the 0.1 µg/L threshold. In contrast, the DG SANTE proposal would mean that the active pesticide substances would not be re-assessed and their use would continue without restrictions, even as authorities recognise the problems their metabolites cause in drinking water. Instead of taking measures at the source to protect public health, the new system would pass the problem down to drinking water suppliers.

EurEau fully supports the Water Resilience Strategy's call for better implementation of existing legislation. This must also include the rules regarding pesticide authorisation in order to protect public health. Simplifying the agricultural acquis must not be at the expense of resilient water services.

Yours sincerely,

Oliver Loebel,
Secretary General

Cc.
Vita Jukne
Axel Hellman
Pernille Weiss-Ehler
Paula Duarte Gaspar