

To: Ms Roberta Metsola, President of the European Parliament Mr Pierfrancesco Maran, Chair, Committee on the Environment, Public Health and Food Safety (ENVI) Ms Veronika Vrecionová, Chair, Committee on Agriculture and Rural Development (AGRI)

Cc: [to be decided]

[Place], [date]

Subject: Request to pause the legislative debate on the Food and Feed Safety Omnibus pending an independent impact assessment

Madam President, Mr Chair, Madam Chair,

We are scientists from the field of physics, ecology, (eco)toxicology and from the medical sector, joined by legal academics, experts of the public health, and environmental protection officials, writing to express our shared concern about the absence of an impact assessment for the "Food and Feed Safety Omnibus", as well as the pace at which it is currently examined in the European Parliament. We respectfully ask that the debate be paused until a rigorous, independent assessment of the OMNIBUS X proposal related to health, environmental and administrative consequences has been carried out.

The Omnibus proposes to amend ten separate pieces of food and feed safety legislation in a single package, including rules on the approval and renewal of plant protection products, the setting of maximum residue levels, and controls on imported food. Such a broad and consequential reform would ordinarily be expected to rest on a thorough ex-ante evaluation of its effects. To date, no such comprehensive assessment has been made available to the co-legislators.

This absence is not for lack of relevant scientific input. In recent months, an independent assessment commissioned by the Dutch Parliament has raised concerns about the package's implications for health and environmental protection. Germany's National Academy of Sciences, Leopoldina, has issued a position paper cautioning against loosening the approval process for plant protection products at the expense of health and environmental safeguards. Researchers from Germany and the Netherlands have published a preprint analysis raising methodological concerns, and a research team at Stockholm University has documented specific gaps in the evaluation of at least one substance under the current framework. These concerns echo those raised earlier this year by a group of researchers writing in the journal *Science*. Taken together, this body of work points to real and, in places, well-documented risks that the current legislative process has not yet engaged with in a systematic way.

We would also note that a rigorous impact assessment is not, in itself, unfamiliar to this file: the Joint Research Centre has already produced an assessment of the economic consequences of import-related measures within this same package. It is difficult to reconcile the existence of a dedicated assessment for one aspect of the Omnibus with the absence of any equivalent assessment of its health and environmental dimensions.

Nor does the case for proceeding without such an assessment appear to rest on firm technical ground. In a written response to a question from a national parliamentarian earlier this year, the European Food Safety Authority itself indicated that a modest increase in its own resources could resolve the case backlog cited to justify open-ended approvals within a substantially shorter timeframe than currently envisaged. This suggests that the administrative

rationale advanced for some of the package's most far-reaching provisions would itself benefit from closer, independent scrutiny. In the EP hearing of September 2nd, 2026, it was clear that the constellation of experts heard were mostly related to those with agroindustrial relationships whilst one independent scientist was heard. These selections do matter in the way members of the Parliament are informed. An impact assessment therefore appears even more useful, as it can provide transparent and harmonized criteria related to efficiency, efficacy and health consequences to human and ecosystems, allowing a conscious decision.

We also plea that the implementation procedures for the new system are not well described and mandates are not clarified. Such matters are crucial and need to be accounted for and incorporated in the impact assessment. For us scientists, the most important concern is that the regulatory system must remain capable of correcting yesterday's decisions with tomorrow's knowledge. This concern must be shared by the European Parliament, even if policy makers might consider other matters to make their decisions. In all cases, we consider a bare minimum that the concerns of science are acknowledged for in the impact assessment and implementation.

We were therefore concerned to learn that, on 23 June, the ENVI committee coordinators declined a request to commission such an assessment from Parliament's own research service. We respectfully regret that decision. We would also note that questions raised during the committee's exchange of views in July about how the negotiating text accounts for existing independent research have, to our knowledge, not yet received a substantive response.

Given the scale of the changes under consideration, and in a broader context in which the scientific community is increasingly called upon to warn of cumulative environmental and health pressures, we believe that responsible policymaking calls for caution rather than speed. We are not asking the co-legislators to prejudge the outcome of this file. We are asking that the debate be paused until an independent assessment — whether carried out by Parliament's own research service or by an equivalent independent body, comparable to the one already commissioned by the Dutch Parliament — is available to inform it.

We would welcome a written response setting out how you intend to address this request, and remain available to discuss the scientific basis for our concerns in further detail.

Yours sincerely,

[Signatories — grouped by category, e.g.: Scientists & researchers / Physicians & public health officials / Environmental protection officials / Legal academics/ each listed with their name and the capacity in which they sign]

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