

Dear Sir/Madam,

On behalf of ToxicFree Switzerland, we strongly oppose the proposed amendment to the Federal Act on Agriculture regarding the simplified approval of plant protection products for the following reasons:

1. Weakening of safety standards: The proposed simplified approval process for pesticides already approved in EU countries risks lowering Switzerland's safety standards. Our current rigorous approval process helps protect public health and the environment.
2. Insufficient consideration of local conditions: Swiss environmental and agricultural conditions differ from neighbouring countries. A pesticide deemed safe elsewhere may pose risks in Switzerland's unique alpine ecosystem [1].
3. Conflict with precautionary principle: The proposal contradicts the precautionary approach that has guided Swiss chemical regulation. Approving substances without thorough evaluation goes against this principle [2].
4. Potential increase in hazardous pesticide use: Simplifying approvals could lead to increased use of pesticides banned or restricted in Switzerland due to health or environmental concerns [1].
5. Undermining of existing protections: The proposal may weaken existing Swiss regulations on pesticide residues in food, which are often stricter than EU standards [4].
6. Lack of transparency: The simplified process may reduce public access to information about pesticide approvals and use, hampering informed decision-making.
7. Conflict with sustainability goals: This proposal contradicts Switzerland's commitments to reduce pesticide use and promote sustainable agriculture.
8. Inadequate safeguards: While the proposal allows for rejecting EU-approved substances, the criteria and process for such rejections are not clearly defined.
9. Potential for regulatory capture: Simplifying approvals may increase industry influence over the regulatory process, compromising its independence [2].
10. Disregard for cumulative and synergistic effects: The proposal does not adequately address the combined impacts of multiple pesticides on health and the environment.

We urge you to reject this proposal and instead strengthen Switzerland's commitment to protecting public health and the environment from harmful pesticides. We recommend:

- Maintaining rigorous, independent evaluations of all pesticides before approval.
- Increasing investment in research and promotion of non-chemical alternatives.
- Enhancing transparency in the pesticide approval process.
- Implementing stricter measures to reduce overall pesticide use in line with sustainability goals.

Sincerely,
Sara Gnoni
Toxicfree Switzerland

Citations:

- [1] <https://www.publiceye.ch/en/topics/pesticides/banned-pesticides-on-our-dinner-plates>
- [2] <https://www.swissinfo.ch/eng/society/switzerland-and-pesticides-toxic-relationship-or-necessary-evil/46606208>
- [3] [https://www.europarl.europa.eu/RegData/etudes/IDAN/2017/599428/EPRS_IDA\(2017\)599428_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/IDAN/2017/599428/EPRS_IDA(2017)599428_EN.pdf)
- [4] <https://www.blv.admin.ch/dam/blv/en/dokumente/import-export/rechts-und-vollzugsgrundlagen/cassis-de-dijon-importierte-lebensmittel-gesundheitsgefaehrdend.pdf.download.pdf/cassis-de-dijon-importierte-lebensmittel-gesundheitsgefaehrdend.pdf>
- [5] <https://www.bazg.admin.ch/bazg/en/home/informationen-firmen/verbote-beschraenkungen-und-auflagen/umwelt/gefaehrliche-chemikalien-und-pestizide.html>
- [6] <https://www.publiceye.ch/en/topics/pesticides/banned-in-europe>
- [7] https://food.ec.europa.eu/plants/pesticides/eu-pesticides-database_en
- [8] https://research-and-innovation.ec.europa.eu/document/download/5106eb71-7246-4f77-a27e-a36c1d953cde_en?filename=ec_rtd_he-partnerships-chemical-risk-assessment.pdf