

Expression of Concern by Scientists: the rollback of EU environmental legislation and policies jeopardises the future of EU citizens.
Open Letter, 29.5.2024



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Dear Policymakers,

As scientists, we observe with grave concern the rushed deregulation of environmental standards and regulations in the EU and the unwarranted opposition to the Green Deal. Within merely a few months, decisions have been taken that amount to a systematic, retrograde attack on the Green Deal. These actions not only undermine the EU's own agenda and its international obligations and global forerunners' role, but even cancel past achievements. We list some of the key decisions and actions where we see poor justification, but substantive scientific evidence against them.

1) Sustainable Use Regulation (SUR)

The Commission's original SUR proposal aligned with strong evidence of the broad and increasing prevalence of agrochemicals in our food and water and the associated negative impacts on human health and the environment. Despite repeated weakening, the SUR was rejected by the European Parliament and then withdrawn by the Commission. In doing so, they ignored an evidence-based [open letter signed by 6000 scientists](#) and an [appeal from over 1 million citizens](#) in favour of the SUR.

2) Common Agricultural Policy (CAP)

Both the Parliament and Council voted hastily for a Commission proposal to weaken the environmental effectiveness of five out of nine basic environmental standards – including the elimination of fallow land on arable land and enhancing the possibilities to convert grassland into arable land. While there is no evidence that these decisions would address the core problems for farmers, they may enhance the risks for farming – and food security – by accelerating soil erosion, land degradation and biodiversity loss, worsening the potential impacts of extreme weather events, and further degrading key ecosystem services that are key to agriculture such as pest control, pollination and water retention.

3) Nature Restoration Law (NRL)

The cost-efficiency of nature restoration is well known. The fact that 80 % of habitat types are in poor conditions in the EU, and rapid overall environmental degradation, demonstrates the urgency of the NRL to restore ecosystems. Its positive contributions to society, including human health, food security, resilience to extreme weather events, and carbon sequestration, have been repeatedly highlighted and called for by scientists, civil society, and businesses. Following intense trilogue negotiations between the Parliament, the Council and the Commission, the NRL was finally approved by the Parliament. It is now held back by a few countries that utilise procedural minority protection provisions, in contradiction to an established scientific consensus and an [appeal from over 1 million citizens](#) in favour of the NRL.

4) Commission's Draft for exemptions in the Nitrate Directive

Current plans of the EU Commission to relax the obligations within the Nitrate Directive could lead to increasing nitrate application in agriculture. Implications include the worsening of water quality in surface and groundwater, as well as downstream effects, e.g., on the North Sea and Baltic Sea, whose situation is already beyond critical. With N surplus levels being exceptionally high in several regions of Europe, this relaxation could (again) increase greenhouse gas emissions from agriculture, enhance pollution, and stand in conflict with the EU's commitment to strive toward climate neutrality.

5) Framework for Sustainable Food Systems (FSFS):

The Commission's proposal for a FSFS, which was planned for release in autumn 2023, could address many concerns of both farmers and consumers. The fact that it disappeared from the Commission's desk despite being ready for publication, warrants a societal debate.

These are only key examples among others – including the renewed approval of glyphosate use for another 10 years, the degradation of the “Soil Health Law” to mere “Soil Monitoring”, ongoing discussions around downgrading the protection status of large carnivores, calls to water down or even cancel the Deforestation Regulation, and halting the discussions on strict protection of old-growth forests. These decisions and processes **represent an overall spirit of rollback of environmental standards and regulations**, some of which being the outcomes of tens of years of efforts strongly supported by science and society.

An anti-environmental spirit seems to prevail among too many of the EU's decision-makers. This is worrying for several reasons: *Firstly*, because much of the justification for these decisions is based on misinformation. *Secondly*, because these decisions seem to be strongly influenced by the particular interests of specific sub-groups and economic corporations within a narrow spectrum of society – partly expressing themselves through violent and/or undemocratic approaches. *Thirdly*, because these decisions conflict with their own stated aims by acting against the principles of sustainability. Namely, according to the best of science, these decisions are **poorly justified and jeopardise our common future** – including the future of the farmers they claim to aid. And finally, because as a global forerunner in climate, biodiversity and environmental legislation, the EU now sends highly regrettable signals to the rest of the world.

In a period of multiple crises, mostly resulting from breaching planetary boundaries, it is unacceptable that European governors opt to worsen the conditions that drive these crises: namely, overusing Earth's resources, emitting greenhouse gases and pollutants, and disposing of waste, microplastic, and toxic material around us. As scientists, **we strongly oppose policy choices that accelerate these avoidable crises**. When food security is at stake, the real causes must be identified and tackled. These are environmental in nature and compounded by socio-economic factors. Accordingly, when considering the hazards generated by these decisions, we see them as violating core principles of the Treaty of the Functioning of the European Union (TFEU), such as the prevention principle, the precautionary principle (TFEU Article 191) and the duty to care.

We call policymakers to

- set a clear and ambitious agenda for environmental protection and the Green Deal for the post-election era, taking environmental issues seriously as they are posing severe threats to society;
- consult with scientists when in doubt to avoid acting on the basis of misinformation;
- take back changes within the CAP, given the risks of enhancing environmental problems and health hazards;
- approve the NRL as an urgent measure to complement and better coordinate the implementation of existing policies to tackle the biodiversity crisis and to improve society's resilience to climate change;
- avoid further watering down of environmental regulations and policies (Nitrate Directives, Deforestation Regulation) by all means.

We finally call on citizens, civil-society organisations and political parties to support responsible policymaking that secure a safe(r) future within our planetary boundaries.

Sincerely,

The Society for Conservation Biology - Europe Region
Scientists for Future (Interdisciplinary Scientific Panel)
The Society for Ecological Restoration Europe
ALTER-Net

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Ecological Society of Germany, Austria and Switzerland
European Ecological Federation
Netherlands Ecological Research Network
EuropeForNature
Ecosystem Services Partnership – European region
The International Mire Conservation Group
Society of Wetland Scientists

The Society for Conservation Biology - Europe Region is dedicated to facilitating, promoting, and advancing the scientific study and conservation of biological diversity.

<https://conbio.org/groups/sections/europe>

Scientists for Future (Interdisciplinary Scientific Panel) supports the global climate movement by providing facts and materials based on reliable and accepted scientific data to activists, politicians, decision-makers, educators and the general public. It is an independent and voluntary collective of scientists, researchers and academics from all kinds of disciplines, united by the deep concern for a shared future. Info: <https://scientists4future.org/>

The Society for Ecological Restoration Europe is the network that advances the science, practice, and policy of ecological restoration to sustain biodiversity, improve resilience in a changing climate, and re-establish an ecologically healthy relationship between nature and culture. Info: <https://chapter.ser.org/europe/>

ALTER-Net is the network of leading institutes from 21 European countries that share the goal of integrating their research capability to assess changes in biodiversity, analyse the effect of those changes on ecosystem services and inform the public and policymakers about this at a European scale. Info: <https://alterneteurope.eu/>

The [Ecological Society of Germany, Austria and Switzerland](#) (**GfÖ** - Gesellschaft für Ökologie e.V.) is dedicated to ecology in science and practice. Its membership centres in Germany, Austria and Switzerland. The Society supports ecological research and training, and promotes the exchange of ecologists in academic institutions, public administration and the private sector by organising annual meetings and working groups.

The [European Ecological Federation](#) (**EEF**) enables cooperation between European ecological societies in order to promote the science of ecology in Europe. It is providing a forum for effective communication throughout the community of ecological scientists in Europe on matters of common interest by disseminating ecological knowledge through meetings, publications and other means.

[The Netherlands Ecological Research Network](#) (**NERN**) is the network of professional ecologists in the Netherlands where all universities and research institutes that have an ecology program participate.

The **EuropeForNature** initiative is a network of scientists that aim to illustrate citizens in Europe the importance of prioritising nature and sustainability, and aim to empower them to use their voice by: 1) Harnessing the collective expertise, insights and visions for a sustainable future of scientists across Europe; and 2) Demonstrating widespread public support for sustainable European policies through proactive engagement and advocacy efforts. <https://europefornature.eu/>

Ecosystem Services Partnership (ESP) – European region. ESP is a global network, connecting over 3.500 people, to connects ecosystem services scientists, practitioners, stakeholders, and policymakers at local, national, regional, and global scales. ESP aims to enhance communication, coordination and cooperation, and to build a strong network of individuals and organisations working on ecosystem services. <http://www.es-partnership.org/>

The **International Mire Conservation Group (IMCG)** is an international network of specialists who internationally promote, encourage and, where appropriate, co-ordinate the conservation of mires and related ecosystems; and internationally enhance the exchange of information and experience relating to mires and factors affecting them. IMCG encompasses over 550 contacts in almost 60 countries. [International Mire Conservation Group](http://www.imcg.org/)

The **Society of Wetland Scientists (SWS)** works to promote best practices in wetland research, education, conservation, preservation, restoration, and management. SWS has over 3,000 members in more than 60 countries. [Home - Society of Wetland Scientists](http://www.societyofwetlandscientists.org/)

Selected links to relevant publications and open letters by scientists:

On the Common Agricultural Policy (CAP):

- Leopoldina (2020): Biodiversity and Management of Agricultural Landscapes, Published by the German National Academy of Sciences Leopoldina, Halle/Saale. <https://bit.ly/3RVnXtW>
- WBAE (2019): Designing an effective agri-environment-climate policy as part of the post-2020 EU Common Agricultural Policy, Statement of the Scientific Board for Food and Environmental Policy (WBAE) at the Federal Ministry for Food and Agriculture, Berlin. <https://bit.ly/4aDojvb>
- WBAE (2018): For an EU Common Agricultural Policy serving the public good after 2020: Fundamental questions and recommendations, Statement of the Scientific Board for Food and Environmental Policy (WBAE) at the Federal Ministry for Food and Agriculture, Berlin. <https://bit.ly/4bKtLOk>
- Pe'er et al. (2020): Action needed for the EU Common Agricultural Policy to address sustainability challenges, *People and Nature* 2 (2): 305-316. <https://doi.org/10.1002/pan3.10080>
- Pe'er et al. (2022): How can the European Common Agricultural Policy help halt biodiversity loss? Recommendations by over 300 experts, *Conservation Letters* 15 (6): e12901. <https://doi.org/10.1111/conl.12901>

- Jongeneel, R.A. (2018): Research for AGRI Committee – The CAP support beyond 2020: assessing the future structure of direct payments and the rural developments interventions in the light of the EU agricultural and environmental challenges, European Parliament, Policy Department for Structural and Cohesion Policies, Brussels. <http://bit.ly/2zStfOk>

On NRL and SUR:

- Pe'er et al. (2023) Scientists support the EU's Green Deal and reject the unjustified argumentation against the Sustainable Use Regulation and the Nature Restoration Law. <https://doi.org/10.5281/zenodo.8128624> - [signed by 6000 scientists](#)

On the Nature Restoration Law (NRL):

- Hering et al. (2023), Securing success for the Nature Restoration Law. Science 382, 1248-1250. DOI: [10.1126/science.adk1658](https://doi.org/10.1126/science.adk1658); [Open Access link](#)
- SER Europe Legal Working Group (2024). 10 legal reasons to vote in favour of the EU Nature Restoration Law. <https://serchapter2018.wpenginepowered.com/europe/files/2024/03/10-Legal-Reasons-to-vote-YES-for-NRL-1.pdf>
- SER Europe Legal Working Group (2022). The EU Nature Restoration Law: Providing legal certainty in tackling the biodiversity and climate crisis. <https://serchapter2018.wpenginepowered.com/europe/files/2023/05/EU-Nature-Restoration-Law-essential-for-legal-certainty.pdf>
- SER Europe (2022). SERE2022 Declaration on the European Commission Proposal for a Regulation on Nature Restoration. <https://chapter.ser.org/europe/declaration-on-eu-nature-restoration-law-2022/>

On carnivores in Europe:

- Revilla et al. 2023. Institutional Science for Policy Report on the damages produced by and the conservation status of wolves in Europe. Estación Biológica de Doñana CSIC. <https://digital.csic.es/handle/10261/337169>

On the Green Deal as a whole:

- Schebesta, H. & J.J.L. Candel (2020): Game-changing potential of the EU's Farm to Fork Strategy. Nat Food 1, 586–588. <https://doi.org/10.1038/s43016-020-00166-9>