

**BETWEEN ENVIRONMENTAL PROTECTION AND
ECONOMIC COMPETITIVENESS:
The Evolution of EU Pesticide Policy under the Von der Leyen
Commissions (2019–2026)**

Kamilla Király

Supervisor: Natacha Cingotti

Advanced Master in EU Environmental Governance ([POLLEN](#))

Université Catholique de Louvain
Institute for European Studies Saint-Louis and the School of European Studies

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1. Introduction

1.1. Pesticide dependency and its environmental impacts

Modern agriculture has become dependent on pesticide use under the pressure of intensified agricultural production all over the world. These plant protection products, including herbicides, insecticides and fungicides, were designed to improve crop yields and food security. Their use has been posing a systemic challenge for societies balancing economic performance and environmental externalities. Research has been extensive in the past decades on the adverse effect of pesticides on biodiversity loss (Hallman et al., [2017](#); Beketov et al., [2013](#); Brühl & Zaller, [2019](#)), on soil, water and air contamination (Silva et al., [2019](#); EEA, [2023](#); Carvalho et al., [2025](#)), on threats to human health (Mostafalou & Abdollahi, [2017](#); Shekhar et al., [2024](#)), and consequently on the alternative ways to pest management, promoting biological control, precision technologies and Integrated Pest Management (Van Eerdt et al., [2014](#); Lamichane, [2017](#); Jacquet et al., [2022](#); Finger & Möhring, [2024](#), Gerken et al., [2024](#)).

1.2. Policy response from the European Union

The European Union is particularly exposed to the challenge of pesticide dependency and has been working on policy formulations for a sustainable use of pesticides. The foundational policy instrument was the [Directive 2009/128/EC](#) on the Sustainable Use of Pesticides aiming to reduce risks to human health and the environment and promoting Integrated Pest Management across member States. However, the key moment came 10 years later, when the first Von der Leyen Commission launched the Green Deal, the EU's flagship initiative for a carbon neutral Europe by 2050. This was the umbrella for many other policy initiatives protecting human health and the environment, just like the Farm to Fork Strategy (EC, [2020](#)) focusing on a “sustainable, fair and healthy food system”, and aiming to “reduce the overall use and risk of chemical pesticides by 50% and fertilizer use by at least 20%”. Building on this momentum and following the identification of shortcomings in the implementation of the 2009 Directive, the Commission in June 2022 tabled a proposal for a Sustainable Use of Pesticides Regulation (SUR) (EC, [2022](#)) to replace the Directive and introduce legally binding reduction targets for Member States on the use and risk of chemical pesticides. However, the European Parliament rejected the proposal in March 2024. The Commission then withdrew the SUR marking an important turning point in EU agricultural policy reflecting broader political tensions surrounding environmental regulation and economic competitiveness.

1.3. Geopolitical crisis and shifting policy priorities

As for the geopolitical context, following the 2020–2021 COVID crisis, Russia’s invasion of Ukraine in 2022 caused more economic difficulties for European countries. Rising fuel and energy prices directly affected farmers, who voiced their concerns through multiple protests in 2023 and 2024 over bureaucratic and regulatory burdens, financial strains and unfair market conditions (Läpple et al., [2026](#)). This period coincided with the European Union elections marked by growing concern among voters about the economic costs of climate policies (Toygür & Sojka, [2024](#)). The commitments of the new Von der Leyen Commission drew heavily on former Italian Prime Minister Mario Draghi’s report on the Future of European competitiveness ([2024](#)) and the focus has been on implementation of legislation instead of new proposals and reducing administrative burden on European companies. Regarding the agricultural sector, this materialised in the Omnibus package proposed by the Commission in December 2025 for the simplification of food and feed safety rules and standards “to boost competitiveness of the EU producers” (EC, [2025](#)). Together, these developments shifted the EU's policy priorities and narratives around environmental goals, including the approach towards pesticide use and regulation.

1.4. Global pesticides markets

The increasing globalisation of the pesticide industry has also complicated the European Union’s efforts to pursue ambitious environmental objectives and provides us context to understand the competitiveness agenda. According to FAOSTAT data ([2025](#)), total pesticide use in 2023 was 3.73 million tonnes of active ingredients, which accounts to a 14% increase in a decade and to a doubling since 1990. Europe was the second biggest importer with 1.96 million tonnes in 2023. Meanwhile Asia exported the most pesticides around 2.4 million tonnes with a value of USD 11.4 billion. By 2023, China made up 46% of global pesticide trade by volume but only 21% by value, showing strong competition from low-cost generics, post-patent products, while Europe remains active in higher-value products (Berndt et al., [2025](#)). At the same time, agrochemical companies have increased their influence and showed a global trend of consolidation through strategic mergers and acquisitions (Strömberg & Howard, [2023](#)), like the acquisition of Syngenta by ChemChina (China National Chemical Corporation) in 2017 or the acquisition of Monsanto by Bayer in 2018. The top five companies, Syngenta Group (China), Bayer AG (Germany), BASF SE (Germany), Corteva (USA) and FMC Corporation (USA), dominate the market. As for European companies, the Draghi report has

considered agrochemicals as part of the EU's energy-intensive chemical sector, which is “strategically important but increasingly under competitive pressure compared with global producers”.

2. Problem formulation

Farmers across the European Union depend on pesticides to sustain agricultural productivity, while European chemical companies simultaneously act as key suppliers of pesticide active substances to global markets, creating an interdependence between agricultural practices and industrial competitiveness. Both dynamics are closely linked to the global competitiveness of the European market. At the same time, the environmental externalities associated with pesticide use have increasingly come into conflict with economic performance and market stability. Reducing these externalities while preserving competitiveness is a complex policy challenge often generating trade-offs and tensions in EU decision-making. The debate surrounding pesticide use in EU provides a particularly suitable case for analysing shifts in these policy narratives. While recent developments, like the withdrawal of SUR or the Omnibus proposal, have been widely interpreted as a weakening of EU environmental ambition (de Sadeleer, [2025](#)), it remains unclear whether these changes represent a paradigm shift or rather an adjustment of existing policy orientations.

3. Aim and research question

The aim of this paper is therefore to assess how the EU's narrative on pesticide regulation has changed over time, and what this reveals about evolving priorities in EU environmental governance. Using a discourse-analytical approach, the study examines whether the growing emphasis on competitiveness and regulatory simplification reflects a departure from Green Deal ambitions. Focusing on the European Commission under Ursula von der Leyen, the analysis traces how shifts in discourse translated into policy change and what this implies for the future of pesticide regulation in the EU.

How did the EU's ambition to reduce pesticide use evolve during the Von der Leyen Commissions (2020-2026), and what does this shift reveal about the growing tension between environmental protection and economic competitiveness in EU environmental governance?

4. Background

4.1. Definition and scope of pesticides in the EU

Before diving into the analysis, it is essential to have an overview of the current pesticide landscape in the EU. First of all, the term “pesticides” is used here as a synonym for “plant protection products.” A plant protection is used to protect plants or plant products by controlling harmful organisms, such as pests, diseases, and weeds, or by influencing plant growth processes. They consist of an active ingredient, safeners or synergists, and co-formulants. Their use is not limited to agriculture but also extends to non-professional users and public spaces. Depending on their characteristics, active ingredients are classified into categories such as low-risk, standard-approved substances, or substances candidate for substitution, the latter are subject to stricter conditions due to their higher risk profile.

4.2. EU regulatory framework

The EU pesticide system is both structurally and regulatorily complex, which is essential for understanding the analysis. The EU regulatory framework for pesticides operates on two levels: active substances are approved at the EU level under [Regulation \(EC\) No 1107/2009](#), while the authorization of finished plant protection products remains the responsibility of national authorities. To monitor progress in reducing pesticide use and risks, the European Union introduced Harmonised Risk Indicators (HRIs). HRI 1 measures trends in the use and risk of pesticides based on sales data and the hazard level of active substances, while HRI 2 tracks the use of emergency derogations granted by Member States under Article 53 of the same Regulation. These derogations allow the temporary use of substances that would otherwise not be authorized in cases of plant protection emergencies. Member States are also responsible for monitoring pesticide residues in food. The maximum residue levels (MRLs) permitted in food are regulated by [Regulation \(EC\) No 396/2005](#), which establishes harmonised MRLs at the EU level for 381 food products and food groups.

4.3. Recent trends in pesticide use

As for the current numbers in play, according to Eurostat data ([2026](#)), in 2024, pesticide sales in the EU reached approximately 316,000 tonnes, an 8% rise over 2023, reversing two consecutive years of decline. Despite this rebound, sales in 2024 remain 12% below 2011 levels. The main category of pesticides sold in the EU in 2024 was fungicides and bactericides (40%), followed by herbicides (35%) and insecticides and acaricides (17%).

5. Analytical framework

This paper uses a hybrid analytical framework combining Framing analysis and Discourse-Historical Analysis (DHA). Framing analysis examines how political actors define problems, propose solutions, and legitimise policy choices through the narratives they construct (Entman, [1993](#)). Hajer ([1995](#)) argues that environmental policy is shaped by competing discourses that define both problems and acceptable solutions, a process captured in his concept of ecological modernisation, which emphasises the reconciliation of environmental protection with economic growth. The DHA approach, developed by Wodak ([2015](#)), completes this as it places these discourses in a broader historical and institutional context and shows how external events, such as economic crises or geopolitical developments, can reshape political narratives. Together, these approaches allow for both the identification of dominant frames in EU pesticide policy discourse and the explanation of how and why these frames shifted between the two Von der Leyen Commissions. Covering both mandates to date, allows for a comparison of policy discourse under the same institutional leadership.

6. Methodology

The empirical analysis is based on a systematic coding of 94 primary documents, mainly consisting of European Commission communications, speeches, and press releases, complemented by legislative proposals. The documents were selected to capture the Commission's discourse on EU pesticide and environmental policy from 2019 to 2026, across both Von der Leyen Commissions. Key quotes from these documents were registered in a coding table then most used expressions by frequency and emphasis were extracted into Figure 2, 3 and 4, corresponding to different periods.

The analysis is structured around three chronological phases, that were identified through examination of the documents. Phase 1 (2019–2022) covers the launch of the European Green Deal, the Farm to Fork Strategy, and the SUR proposal and its impact assessment, representing the peak of the EU's environmental ambition on pesticides. Phase 2 (2022–2024) covers a period of compounding pressures: the COVID-19 aftermath, Russia's invasion of Ukraine, rising farmer protests, the glyphosate renewal controversy, and the 2024 European elections, all of which contributed to a growing contestation of the regulatory agenda. Phase 3 (2024–2026) covers the first part of the second Von der Leyen Commission, defined by the Draghi report on European competitiveness, the Mercosur trade agreement, and the Omnibus simplification packages, marking a reorientation of policy priorities. The next section presents

the empirical findings of the analysis, highlighting the change in political and policy discourse across these three periods.

Table 1. Corpus composition overview.

Document type	Phase 1 (2019–2022)	Phase 2 (2022–2024)	Phase 3 (2024–2026)	Total
Communication	10	—	6	16
Regulation / Decision	1	4	—	5
Proposal	2	—	1	3
Report	2	1	3	6
Speech	7	6	10	23
Press release	4	11	17	32
Opinion	—	2	—	2
Mission letter	1	—	2	3
Resolution / Letter	2	1	—	3
European Citizen's initiative	1	—	—	1
Total	30	25	39	94

Note: Total corpus = 94 documents across the three phases of the Von der Leyen Commission. Pre-VdL documents, so documents before 2019 (n=5) serve as regulatory baseline and are not included in the phase totals.

7. Pesticide reduction as political priority in Phase 1

This paper focuses on discourse development starting from the first Von der Leyen Commission, however it is essential to take into account the political environment that shaped policy priorities of this period. In August 2018, Greta Thunberg started the Fridays for Future school strikes against the lack of action on the climate crisis that quickly grew into climate marches across Europe. This first mass youth mobilisation led to a successful repoliticisation of climate change politics (Tosun & Debus, [2025](#)) and contributing to an unprecedented success for Green parties at the 2019 European elections (Pearson and Rüdiger, [2020](#)). First time after the signature of the Paris Agreement in 2015, these movements enabled effects of politicisation (Dupont et al., [2024](#)) to urge climate action, leading to the publication of the European Green Deal in 2019 with the goal of achieving climate neutrality by 2050.

The discourse analysis of this early period of the Green Deal is identified as Phase 1 and focuses on environmental and pesticide policy narratives from the European institutions. There are five recurring themes in this period based on institutional documents and official communications that are summarised under Figure 2. The *ecological modernisation*, as Hajer described ([ibid](#)), provides an overarching frame, positioning environmental ambition and economic

competitiveness as mutually reinforcing goals. Meanwhile *ecological urgency together with environmental and health protection* is often emphasised in this period, identifying threats to planetary and human well-being through science giving it authority to mitigate risks. The *strong societal pressure* from citizens, scientific community and civil society organisations also amplified the *regulatory ambition* of EU-decision makers cumulating in binding reduction targets and policy revisions. Finally, policy actions in this period are framed as shared opportunities for all participants, especially for *farmers* who are identified *as partners* in the transition. This coherence would begin to fracture under different pressures of Phase 2.

Figure 2. Key discursive themes and rhetorical expressions in Phase 1 (2019–2022).

Discursive theme	Key expressions and rhetorical strategies
Ecological modernisation	new growth strategy; pioneer; good for people, good for the planet, good for business; leading the transition; competitive edge; decoupling growth from resource use; ambitious plan; strong economy
Ecological urgency and citizen protection	toxic-free environment; biodiversity emergency; reverse biodiversity loss; reduce dependency on pesticides; phase out synthetic pesticides; zero pollution ambition; planetary and human health; precautionary principle; intergenerational responsibility
Societal support and civil society pressure	European Citizens' Initiative; follow the science; protect bees and people's health; pesticide-free farming; transforming agri-food systems; restore natural ecosystems; European diet; One Health; farmer-based training and research
Regulatory ambition	legally binding targets; harmonised reduction targets; 50% reduction by 2030; ambitious plan; phase-out by 2035; bring nature back; restore Europe's nature; public support
Farmer as transition partner	support farmers in the transition; fair standard of living; sustainable practices; shared responsibility; rural communities; co-benefit of sustainability; food security; viable alternatives

Source: Analysis based on systematic coding of 30 documents (2019–2022).

1.1. Ecological modernisation

After the 2019 European elections, environmental ambition was framed within a broader narrative of *ecological modernisation* and economic and societal transition not just as a standalone policy priority. In her 2019 opening statement as a candidate for the Commission presidency, Ursula Von der Leyen emphasised that climate change will affect all countries hence the need for unity and common action: “*Whether it is Finnish wheat farmers facing drought or the French facing a deadly heatwave: we are all feeling quite clearly the effects of climate change.*” The announced European Green Deal framed climate action and environmental protection as a new growth strategy for Europe, making a link between sustainability and competitiveness: “*If we want to succeed with this ambitious plan we need a*

strong economy.” (Von der Leyen, [2019](#)) “*Our European Green Deal is our new growth strategy. It is good for people, good for the planet and good for business.*” (Von der Leyen, [2020](#)). This arguably marks a major shift in how the EU understands sustainability, placing environmental and climate goals at the centre and the economy at their service (Schunz, [2022](#)). Thus, through the Green Deal the EU is identified as an environmental pioneer, leading the transition through ambitious policies and setting global standards.

7.1. Ecological urgency and citizen protection

At the same time, the EU is framed as a *protector of citizens and nature*, emphasising health risks, zero pollution, and responsibility towards future generations. The Political Guidelines ([2019](#)) made this explicit: “*For the health of our citizens, our children and grandchildren, Europe needs to move towards a zero-pollution ambition.*” The Biodiversity Strategy, the Zero Pollution Action Plan, and the EU Chemicals Strategy for Sustainability all constructed environmental degradation and chemical pollution as existential threats to our societies and our ecosystems requiring immediate action. An *ecological urgency* was addressed with highlighting “*toxicity*” and the “*suffering*” of biodiversity from the threat of pollution including chemical pesticides, hazardous chemicals and industrial waste. This narrative used the precautionary principle and positioned regulatory intervention as a moral obligation rather than a policy choice.

7.2. Societal support and civil society pressure

This framing was not only institutional, it reflected a *strong public pressure* coming both from a bottom-up civil mobilisation and a joint display of epistemic communities. The Save Bees and Farmers European Citizens' Initiative, registered by the Commission in September [2019](#), called for the legal phase-out of synthetic pesticides by 2035 “*to restore biodiversity, and to support farmers in the transition*”, mobilising over one million signatures and demonstrating public support for pesticide reduction. This citizen pressure was echoed within the scientific community: on 23 February 2020, the “Towards a Chemical Pesticide-Free Agriculture” declaration was signed by 24 research bodies from 16 European countries at the International Agricultural Show in Paris, calling for a complete paradigm shift towards pesticide-free farming and arguing that the research community must rethink agricultural systems and go beyond the existing paradigm of a food system heavily dependent on chemical pesticides (European Research Alliance, [2020](#)). The European Parliament, in its resolution on the EU Biodiversity Strategy for 2030 ([2021](#)) welcomed the target of reducing hazardous chemical

pesticides by 50% and highlighted that the dependency on pesticides that comes at high costs to farmers. It called on the Commission to revise the Directive on the sustainable use of pesticides, as well as the Regulation on maximum residue levels and emphasised the need for more transparent and accessible regulatory risk data in the authorisation process.

7.3. Regulatory ambition

This *regulatory ambition* materialised in concrete policy proposals, as announced in the Green Deal. The Farm to Fork Strategy (2020) established three concrete targets to be achieved by 2030: a 50% reduction in the use and risk of chemical pesticides, a 50% reduction in the use of the more hazardous ones, and at least 25% of EU agricultural land under organic farming. These targets were reinforced by the Zero Pollution Action Plan and the Biodiversity Strategy for 2030, which together raised pesticide reduction to a key policy priority, highlighted across several different policy areas. To measure progress on the targets of pesticide reduction, the Commission developed two harmonised risk indicators based on sales of active substances, although these indicators were criticised over time because of the lack of actual data on pesticide use (Bär et al., 2022). Further to the regulatory ambition, the Commission reviewed the 2009 Directive on the sustainable use of pesticides and found that “*Only limited progress has been achieved in measuring and reducing the use and risk of pesticides in the EU over the period 2011–2018*” (EC, 2020). Hence the proposal to turn the directive into a regulation; to replace voluntary national targets with legally binding EU-wide reduction targets, mandatory national action plans, measurable milestones, and overall stricter rules on the use of pesticides in sensitive areas (EC, 2022). On the same day, the Commission also published the proposal for Regulation on nature restoration (2022) or so-called Nature Restoration Law (NRL), setting a binding target “*to put restoration measures in place on at least 20% of the EU's land and sea areas by 2030, and to restore all ecosystems in need of restoration by 2050*”. However, at the end of the legislative procedure in 2024 the Sustainable use of pesticides Regulation (SUR) was not adopted in Parliament, while the NRL passed by a narrow margin. The circumstances leading to these events are discussed under the next section.

7.4. Farmer as transition partner

In the Farm to Fork Strategy, farmers are positioned as *partners in the transition*, who are “*part of the fabric of our rural communities and a provider of safe, nutritious and affordable food for Europeans*” (EC, 2020). The Strategy aims for a transition to a sustainable food system with a neutral or positive impact to the environment, reversing biodiversity loss while ensuring

food security and competitiveness of the EU supply sector. It also addresses the dependency on pesticides and is setting ambitious targets for their reduction. The mission letter to Agriculture Commissioner Wojciechowski (2019) reinforced this framing, explicitly tasking the Commissioner with ensuring that *“agriculture and food production contributes to our climate, environmental and biodiversity goals, notably by reducing the use of pesticides, fertilisers and chemicals in Europe and beyond”*, while simultaneously committing to support farmers financially and technically in making the transition. Pesticide reduction was thus presented not as a burden imposed on the agricultural sector but as a shared responsibility embedded in a broader vision of rural prosperity and food system sustainability. When analysing contributions to the public consultation of the Strategy, Frelih et al. (2023) found that *“those in favour of reducing pesticides tend to argue on the grounds of planetary and human health, emphasizing that alternatives already exist and resistance to change results from a lack of political will. Those arguing against setting further restrictions on pesticide use, focus on food security and the lack of viable alternatives.”* This division, already evident during the consultation process in Phase 1, became much more pronounced in Phase 2, as farmer protests emerged and growing political opposition to the SUR.

8. Economic pressure on the climate agenda in Phase 2

The first Von der Leyen Commission faced challenges from early on. The lockdowns during the Covid-19 pandemic exposed the fragility of global supply chains, negatively affected food producers and raised concerns about food security globally (Aday & Aday, 2020). EU food supply chains and European farmers were also impacted showing the sector's vulnerabilities, with farm incomes falling by 7.9% and labour shortages affecting up to one million seasonal workers (Montanari et al., 2021; Jagtap et al., 2022).

The effects of the pandemic were still lingering when Russia attacked Ukraine on 24 February 2022. The war further contributed to the disruption of agricultural products as countries of the Black Sea region were key global suppliers for wheat, maize, barley, and sunflower, leading to rising prices of essential goods and disproportionately affecting low-income households (Chepeliev et al., 2023; Kornher et al., 2024). In response, the EU set up Solidarity Lanes Action Plan (2022) to enable Ukrainian grain exports via overland routes and at the same time, the UN launched the Black Sea Grain Initiative, which reopened maritime export corridors from Ukrainian ports (UN, 2022). However, these measures had unintended effects: increased Ukrainian imports into neighbouring countries disrupted local markets, triggered farmer

protests, and led the EU to introduce temporary import limits on certain products in Poland, Slovakia, Hungary, Romania and Bulgaria (EC, [2023](#)). Overall, the pandemic and the war created pressures in the agrifood sector leading to some changes in the environmental discourse and political objectives of the EU. Siddi ([2022](#)) argues that this led to ‘geopolitical turn’ in the green transition, reevaluating EU's security, interest and cooperation with Western allies.

These pressures from energy insecurity, food price volatility and contested agricultural trade environment equally reshaped how pesticide policy was negotiated in this period. Phase 2 analysis therefore covers the period after the pandemic and the beginning of the war, until the 2024 European Elections. Figure 3 details the four discursive themes that were identified across 25 primary policy documents and institutional communications from this period. First, as partially detailed above, the health crisis followed by the *energy crisis* acted as *discursive triggers* shifting the political narrative towards security, particularly food security questioning the feasibility of pesticide reduction targets. To some degree, a *regulatory contestation* is observed as the SUR proposal became a site of institutional conflict and ultimately leading to its withdrawal. Additionally, the *tension between science and politics* is similarly visible in the glyphosate renewal. Finally, *farmers as political actors* represent a narrative shift from partners due to their contestation of policy actions and their participation as serious stakeholders in political negotiations.

Figure 3. Key discursive themes and rhetorical expressions in Phase 2 (2022–2024).

Discursive theme	Key expressions and rhetorical strategies
Crisis as discursive trigger	energy dependence; REPowerEU; cost of living; food security; supply chain disruption; geopolitical uncertainty; affordable food; farmer vulnerability
Regulatory contestation	lack of political agreement; economic constraints; mandatory targets questioned; harmonised reduction questioned; derogations; SUR a symbol of polarisation
Science under political pressure	follow the science; EFSA peer review; science-based decision; political interference in regulatory process; glyphosate renewal controversy; contested evidence; precautionary principle challenged
Farmer as political actor	farmers deserve to be listened to; driving seat; strategic dialogue; rural communities; bureaucratic burden; unfair market conditions; financial strains; protests; profitability of farms

Source: Analysis based on systematic coding of 25 documents (2022–2024).

8.1. Crisis as discursive trigger

The crises of this period acted as *discursive triggers*, shifting political narratives away from environmental ambition and toward security. COVID-19 pandemic negatively affected

agricultural production and food security (Okolie & Ogundeji, [2022](#)). Lockdowns caused labour shortages, disrupted transport, and increased food prices, deepening farmer vulnerability (Dayanandan et al., [2023](#)). The war in Ukraine further amplified inflation in the Euro Area with a sharp increase in energy and food prices (Ferreira et al., [2025](#)). Additionally, to the energy dependency, many European countries were highly dependent on imported agrichemical products, such as fertilisers coming from Russia (FAO, [2022](#)), further deepening the input costs for farmers due to shortages on the global market. The EU reacted swiftly, in the Versailles declaration ([2022](#)) EU leaders urged the Commission “*to present options to address the rising food prices and the issue of global food security as soon as possible*” and pledged to reduce energy dependency and to improve food security “*by reducing our dependencies on key imported agricultural products and inputs*”. While the Commission introduced the REPowerEU plan “*ending our dependence on Russian fossil fuels and accelerating the green transition*” (Von der Leyen, [2022](#)), it also postponed the adoption of the SUR and Nature Restoration Law. The package of measures presented for 'Safeguarding food security and reinforcing the resilience of food systems' ([2022](#)) further aimed to support farmers and consumers, while building on the Farm to Fork Strategy, accelerating “*the food systems transition towards sustainability and resilience*”. However, it also included a derogation from greening obligations to bring fallow land back to production (EC, [2022](#)) signalling that food security could override environmental commitments if sufficiently urgent.

8.2. Regulatory contestation

The SUR proposal was presented at the beginning of the energy crisis in June 2022 and it faced immediate challenges, as a *regulatory contestation* started to emerge in Phase 2. The European Economic and Social Committee (EESC) in its opinion stressed that pesticide reduction “*must not jeopardise agricultural productivity, food security and the competitiveness of EU farmers*” (EESC, [2022](#)). The Committee of the Regions (CoR) added a territorial dimension, calling for “*greater flexibility... taking into account regional agricultural specificities and economic constraints*” (CoR, [2023](#)). In December 2022, the Council requested an additional impact assessment to the Regulation particularly focusing on “*the expected decrease in yields in the Union resulting from the reduction and restriction of the use of plant protection products*”, stating that the proposal did not consider “*long-term impacts on food security in the Union*” as it was concluded “*before the war in Ukraine and the energy, fertilisers and food crises*” (Council, [2022](#)). The Commission carried out further analysis confirming the need to reduce

the risk of chemical pesticides, highlighting that “*the long-term cost of inaction is higher than the cost of action*”, showing that “*the crops with yields most affected by pesticide reduction have limited relevance for food security*” (EC, [2023](#)). In November 2023 however, the European Parliament rejected the text by 299 votes to 207, after more than 200 amendments had already reduced its ambition (EP, [2023](#)). The rapporteur Sarah Wiener (Greens, AT) expressed disappointment at the following press conference stating that the decision was “*a disappointment for our environment, our biodiversity goals, for our health, the health of our children and grandchildren*” (EP, [2023](#)). Von der Leyen announced the withdrawal of the proposal in February 2024 as it “*has become a symbol of polarisation*”, announcing the need for a different approach developed together with stakeholders (EC, [2024](#)). This outcome was the final result of the eroding political support, and of the weakening of regulatory ambition over time, due to productivity and food security concerns. The Nature Restoration Law however was adopted with diluted provisions compared to the original Commission proposal, including an agricultural emergency brake allowing Member States to temporarily suspend targets if they risk significantly reducing food production. This was a result of sustained lobbying by agricultural groups, combined with pressure from conservative parties during trilogue negotiations (Cliquet et al., [2024](#)).

8.3. Science under political pressure

The pattern for *science being undermined by political pressure* was already shown with the SUR, as in July 2023 over 6000 scientists signed an open letter to decision-makers supporting the Green Deal and rejecting “*unjustified argumentation*” against the SUR and the NRL. They argued that reducing pesticide use and restoring ecosystems does not threaten food security, as long-term production depends on biodiversity and ecosystem services while the main risks to food security are from climate change and biodiversity loss rather than regulation (Pe'er et al., [2023](#)). In the same month, the European Food and Safety Authority (EFSA) delivered its conclusion on glyphosate which did not identify any critical areas of concern on the risk to humans, animals or the environment (EFSA, [2023](#)). Glyphosate is the world's most widely used herbicide and the most commercially significant generic pesticide since its original patent expired in 2000. In Europe, it represents a significant revenue stream for agrochemical companies such as Bayer AG. Following an ECI ([2017](#)) to ban glyphosate, in 2017 it was renewed only for five years reflecting the political sensitivity (EC, [2017](#); EC, [2017](#)). For the second renewal process starting in 2019, a consortium of companies, Glyphosate Renewal

Group, submitted the dossier to be assessed by four rapporteur Member States (EC, [2019](#)). Due to the large volume of files and public consultations EFSA requested more time for evaluation forcing the Commission to extend the approval with one year (EC, [2022](#)). Then in September 2023 the Commission proposed the renewal based on the new assessment, however Member states failed to reach a decision by qualified majority in the Standing Committee on Plants, Animals, Food and Feed (SCoPAFF), and in the Appeal Committee (EC, [2023](#)) so the Commission adopted the renewal itself in November 2023 (EC, [2023](#)). The decision was immediately challenged, by several NGOs, arguing that the assessment relied too heavily on industry-funded studies and failed to properly apply the precautionary principle, leading them to bring the case before the Court of Justice (PAN, [2024](#)). In response to this controversy Commissioner Kyriakides told Parliament: “*we must follow science*” (Kyriakides, [2023](#)) – a statement with a striking contrast with the silence that had greeted 6,000 scientists urging the opposite conclusion just months before on the SUR proposal.

8.4. Farmer as political actor

Farmers became increasingly vocal about their concerns, shifting the narrative from farmers as partners to *farmers as actors* contesting and pushing decision-makers for actions through organised protests during Phase 2. The farmers' protests in 2023 and 2024 had different triggers by country: while in France they were linked to rising production costs and water restrictions, in Germany they reacted to the planned removal of fuel subsidies, and in the Netherlands and Belgium to stricter nitrogen regulations, with additional mobilisation elsewhere driven by drought impacts, import competition; notably Ukrainian grain and trade agreements like Mercosur (Finger et al., [2024](#)). However, as detailed above, there were shared demands linked to the profitability of farms, bureaucratic burden and unfair market conditions (Matthews, [2024](#); Läßle et al., [2026](#)). The Belgian Presidency of the Council named this a “*crisis situation facing the agricultural sector*” in March 2024 and highlighted that “*Member States expressed a strong desire to give rapid and robust answer to the farmers' demonstrations*” and “*voiced concerns regarding the distortion of competition from imported products and the need for further support, other than state aid*” urging the Commission for action. (Council, [2024](#)).

By this time the Commission launched a Strategic Dialogue on the Future of Agriculture ([2024](#)), bringing together farmers, agri-food businesses, NGOs and rural communities to address key questions such as “*how can we elevate the standard of living for farmers*” or “*how can we enhance Europe's food system for a competitive, thriving future*” (Von der Leyen,

[2024](#)). Additionally, the Commission proposed a set of short- and medium-term measures to “*relief to both farmers but also to national administrations*”, focusing on simplifying “*some of the conditionality requirements with which EU farmers need to comply*” including the removal of the obligation of 4% arable land as non-productive area (EC, [2024](#)). As Von der Leyen presented “*simplification of our agriculture policies*” as a “*constant priority, at both EU and national level*” (EC, [2024](#)), the narrative shift becomes apparent. It became more difficult for the Commission to maintain prior Green Deal commitments as it was facing an increasing political pressure to ease required efforts from farmers to accelerate the transition amid economic difficulties. Phase 2 did not show an abrupt change in political framing but a continuous erosion of regulatory ambition and the emergence of different priorities.

9. Competitiveness comes first in Phase 3

Matthews ([2025](#)) argued that farmer protests brought the distribution of transition costs to the centre of the debate, reinforcing a shift from the polluter pays principle towards a just transition approach, where farmers are compensated for sustainable practices as ecosystem services. As demonstrated in the Phase 2 analysis, this political climate, in which concerns over farm income and competitiveness became more important ahead of the 2024 European elections, made it harder to maintain strong environmental policies, as policymakers increasingly responded to farmers’ concerns and calls for fewer regulations and more support. Right-wing and far-right parties actively sided with farmers or even fuelled protests during the campaign, often positioning themselves against the Green Deal’s agricultural conditionalities to mobilise rural voters (Žuk, [2025](#)). The analysis of phase 3 focuses on the discursive developments following election outcome, which reinforced this dynamic, with the Greens losing influence and radical right-wing parties expanding, often mobilising anti-EU integration rhetoric (Crum, [2025](#)), while scepticism towards the Green Deal also gained ground within the mainstream right (Catarinella et al., [2025](#)).

High-level reports commissioned by the Council and the Commission and drafted by Enrico Letta (‘Much more than a market’, April [2024](#)) and by Mario Draghi (‘The future of European competitiveness’, September [2024](#)) respectively, identified key challenges for the European Single Market to remain competitive on the global stage. The new Commission’s programme responded to the election demands and built on these reports when presenting the new Clean Industrial Deal, the Competitiveness Compass or the ‘Omnibus’ packages aiming to simplify existing EU legislation, including a tenth Omnibus on food and feed safety in December 2025

that focuses on “*reducing unnecessary administrative costs and burdens for agri-food producers and operators and national authorities*” (EC, [2025](#)).

Phase 3 analysis therefore covers the period after the 2024 European Elections until the end of the feedback period (22 May 2026) of the Food and feed safety simplification omnibus. Figure 4 details the four discursive themes that were identified across 39 primary policy documents and institutional communications from this period. *Competitiveness first* is the overarching frame, positioning economic performance as the primary goal for policy makers in this period. *Trade and global competition* narratives fit into this, highlighting tensions between the well-regulated Single Market and less-regulated global markets, particularly visible in debates on the EU-Mercosur agreement and standards on imported products. As a response, *simplification as a policy logic* appears, emphasising efficiency, flexibility and faster administration in the regulatory process and taking form in the omnibus packages, like the food and feed simplification omnibus. *Farmer as an economic actor* is reframes the economic importance of the EU's agro-industry and completes the shift across phases from partner in sustainability through actor challenging regulation to competitive producers in the global value chain.

Figure 4. Key discursive themes and rhetorical expressions in Phase 3 (2024–2026).

Discursive theme	Key expressions and rhetorical strategies
Competitiveness first	Clean Industrial Deal, Competitiveness Compass; excessive bureaucracy; need for innovation; technology gap; energy costs; global market positions; sovereign Europe; faster and simpler Union
Trade and global competition	level playing field; unfair competition; EU-Mercosur partnership; win-win; exports, growth and jobs; new chapter of opportunity; alignment of production standards; pesticide residue safeguards; geopolitical signal; market access
Simplification as policy logic	cut the red tape; Omnibus packages; reduce unnecessary regulatory burdens; reduce reporting obligations by 25%; growth-friendly; €1 billion in savings; less paperwork, more trust; streamlined authorisation
Farmer as economic actor	thriving farming sector; competitive and resilient; attractive farming; generational renewal; starter pack for young farmers; toolbox for crop protection; biocontrol acceleration; precision farming; drones

Source: Analysis based on systematic coding of 39 primary documents (2024–2026).

9.1. Competitiveness first

After the European Elections, Von der Leyen’s candidacy speech in July 2024 in front of the European Parliament immediately set the tone for her second mandate: “*Our first priority will be prosperity and competitiveness*”, “*The race is on and I want Europe to switch gear*”. She added that the process should start “*with making business easier and faster*” (Von der Leyen,

[2024](#)). The Political Guidelines published the same month reinforced this approach, calling for a Union that is “*faster and simpler, more focused and more united, more supportive of people and companies*” (Von der Leyen, [2024](#)). This programme was largely inspired by the Draghi report that reframed climate and industrial policy within a broader discourse of competitiveness, technological sovereignty, and economic security. Draghi argued that Europe needs to “*change course*” in response to slowing productivity, weak investment, and increasing competition from the United States and China. He called for greater coordination among Member States, investment in innovation, digital infrastructure and clean technologies in order to maintain Europe’s economic model (Draghi, [2024](#)). The report strongly influenced EU institutions, prompting a reassessment of policy priorities (McCann & Stierna, [2026](#)) through the Competitiveness Compass (January [2025](#)) and the Clean Industrial Deal (February [2025](#)), which repositioned the green transition as an economic and industrial opportunity at the global level. As Wendler ([2025](#)) notes, this reflects a “re-framing of EU climate action towards broader and more economically defined objectives than the Green Deal's original focus on net-zero GHG emissions.” Von der Leyen’s 2025 State of the Union speech confirmed this direction with only mentioning the Green Deal once in the context of reduction targets helping Europe’s place in clean-tech leadership vis-à-vis the US and China. (Von der Leyen, [2025](#)). Additionally, an analysis from the European Policy Centre assessed legislative proposals between December 2024 and July 2025 and found that references to environment and food security appeared in only 7% of relevant Commission communications, while competitiveness dominated the narratives (Maurice & Kocsis, [2025](#)). Von der Leyen continued to link environmental and economic goals in her rhetoric. However, their relationship changed: what had previously been presented as balanced and mutually reinforcing became more hierarchical, with competitiveness now guiding all other objectives.

9.2. Trade and global competition

The framing of *trade and global competition* in Phase 3 dominated the external outlook of the policy agenda. In relation to the EU pesticide policy this area presented some underlying tensions between the agrochemical industry and farmers as local producers. The EU is one of the world’s largest exporters of agrochemicals, its chemical industry has been identified as a strategic sector under competitive pressure in the Draghi report. At the same time, European farmers have been exposed to import competition from countries operating under significantly less stringent environmental standards. This asymmetry already surfaced with the Ukrainian

imports but was especially visible with the Mercosur-EU partnership debate. The EU–Mercosur agreement, whose negotiations had stalled repeatedly since 1999, was relaunched in December 2024 and signed in January 2026. Von der Leyen described this deal as “*one of the most consequential trade agreements of the first half of this century*” and as a deal that “*gives Europe a strategic first-mover advantage in a world of sharp competition*” (Von der Leyen, [2026](#)). Concerns had been raised with Mercosur having significant cost advantage over the EU driven by lower labour costs, favourable conditions for multiple harvests per year and weaker regulatory standards (Jarzebowski et al., [2026](#)). In response to rising tensions, disagreements between Member States and repeated farmer's protests in Brussels (ENG, [2025](#)) the text was finally amended with safeguard clauses for agricultural products to “*strengthen protections for EU farmers*”. These measures aim to monitor and block imports if they increase by 5% over three-year average (Regulation [2026/687](#)). This action was framed as “*extra layer of protection*” in response to the “*farmers concern*” and Commissioner Hansen wanted “*producers benefit from this deal, as much as all other sectors in our economies, without feeling threatened by it*” (EC, [2025](#)). One of the “all other sectors” benefiting is the agrochemical industry.

Regarding pesticide trade and consumption, it was mentioned in the introduction that Brazil and Argentina are among the biggest importers, being also subjects to European exports. Despite the promise to ban the export of hazardous chemicals as part of the 2020 Chemical Strategy for Sustainability, nearly 122,000 tonnes of EU-banned pesticides were exported in 2024, up 50% from 2018, with Brazil among the largest recipients (Public Eye & Unearthed, [2025](#)). Although it was emphasised that strict maximum residue limits (MRLs) would apply to imported products through a mirror clause, this still creates double standards, as these restrictions do not apply at the production stage, where active ingredients banned in the EU remain authorised across Mercosur, raising concerns about the effectiveness of EU border controls (Krzyzanowski, [2025](#)). Overall, the discourse-analysis from this period focuses on Mercosur as an “*opportunity for European industry*”, including automobiles, machinery, chemicals and pharmaceuticals, rather than on food-safety issues.

9.3. Simplification as policy logic

Simplification as a policy logic represents the third major discursive theme of Phase 3, and the one most directly consequential for pesticide regulation. Where the competitiveness framing established the overarching narrative and the trade framing located it externally, simplification

is where that narrative was operationalised internally. The omnibus proposals were identified in the Competitiveness Compass as “*horizontal enablers to increase competitiveness across all sectors*” (2025) amending existing legislation. Commissioner Dombrovski responsible for Implementation and Simplification emphasised that “*the simplification agenda is not about deregulation*” (EC, 2025) although reducing complex regulatory frameworks may come down to deregulation (Banking Union, 2025). The dominant expression became “*cutting the red tape*” and led to strategic dialogues with the industries. Based on the dialogue with the chemical sector the Commission proposed and Action plan, a sector-specific Omnibus and a Chemical Industry package to “*ensure that the interests of the industry, of its workers, and of European consumers remain well protected*” (EC, 2025). The Chemical Omnibus proposes to relax and postpone several obligations under the revised Classification, Labelling and Packaging (CLP) Regulation (2008), including rules on labelling for hazardous chemicals, ease advertising for hazardous substances etc to decrease compliance costs. Compared to Phase 1 where the priority was a “*toxic-free future*” and better health for “*our children and grandchildren*” the narrative softened to a “*protection of consumers*”.

The Food and Feed Safety Omnibus applies this logic to pesticide regulation (EC, 2025). For the agrochemical industry, the main measures include faster renewal procedures for pesticides and biocides, quicker market access, and replacing the fifteen-year review cycle with authorisations of unlimited duration for pending renewals. Bird & Bird (2026) flagged that the proposal includes “*more pragmatic approach to border controls for plant products*” potentially prioritising trade facilitation over precautionary controls. The package also allows drone use for targeted pesticide application, presenting technology as a tool for efficiency. The communication focused on new opportunities rather than previously established reduction targets or environmental protection goals: “*farmers faster access to innovative and more sustainable products*” and “*more and better tools, such as precision farming and biopesticide*” (EC, 2025). In contrast to Phase 1 that framed pesticide reduction as an environmental and health obligation, Phase 3 treats authorisation as a matter of procedural efficiency, despite similar references to high standards.

9.4. Farmer as economic actor

The discursive positioning of farmers in Phase 3 emphasises their importance as *economic actors*. The final report on the Future of EU Agriculture (2024) presented at the beginning of the second Von der Leyen Commission and contributed to the Commission's Vision for

Agriculture and Food ([2025](#)) delivered in the first 100 days of the new mandate. In the foreword to the report, Peter Strohschneider, chair of the dialogue and adviser to the President put the key issue this paper also discusses rather bluntly saying that “*agricultural production and its natural preconditions have become entangled in a lose-lose constellation*” juxtaposing “*productivity and nature loss as mutually exclusive dichotomies*”. The report attempts a “reconciliation” of these tensions by supporting implementation of existing EU legislation, by accelerating “*sustainable and competitive transition*” of agri-food systems, by suggesting greater coherence between trade and sustainability.

As for pesticides, the report advocated for banning hazardous pesticides to countries with less stringent regulations. Half a year later, the Vision put the emphasis on and agrifood sector that is “*attractive, competitive, future-proof and fair for current and future generations*” with key proposals to make agriculture financially viable and properly rewarded for ecosystem services. In these proposals, EU climate objectives were still present as well as protection of EU's biodiversity viewed not as the aim but as conditions for a future-proof sector. As for pesticides, the focus was rather on alternatives than reduction. In contrast to the mission letter of Wojciechowski's 2019 mandate, Hansen's letter omitted any reference to pesticide reduction, a shift that is reflected in the absence of this issue in the Vision he subsequently prepared. As for reducing reporting obligations of farmers, CAP simplification package (EC, [2025](#)) and the Food and Feed omnibus, discussed above, were announced. The CAP Omnibus amended Strategic Plans Regulation and Horizontal Regulation with lowering the environmental requirements (GAECs) for farms receiving direct payments and with abolished controls and penalties for non-compliance with the GAECs for farms under 10 hectares (EC, [2025](#)). Critics argued that this proposal diluted environmental ambition and urgency (Corporate Europe Observatory, [2025](#); Greens/EFA, [2025](#)). Whether the reconciliation called for by the Strategic Dialogue can be achieved remains uncertain: the CAP Omnibus has already weakened Phase 1 environmental conditionality, while the pending Food and Feed Safety Omnibus seeks to simplify the authorisation and review procedures that form the EU's precautionary framework for pesticides.

10. Conclusion

This paper examined how the EU's narrative on pesticide regulation changed during the Von der Leyen Commissions (2020–2026) and what this reveals about the tension between environmental protection and economic competitiveness. Analysis of 94 primary documents

shows a clear shift in discourse. While not a complete paradigm change, it goes further than official rhetoric suggests. The EU's goal of reducing pesticide use by 50% by 2030 has weakened, but the broader agricultural transition has not ended. Phase 1 was shaped by ecological modernisation. Environmental protection and competitiveness were presented as compatible goals, and pesticide reduction was framed as a shared responsibility linked to public health, biodiversity, and sustainable farming. In Phase 2, a series of crises including COVID-19, the war in Ukraine, rising energy prices, and farmer protests shifted attention toward food security and economic viability. Support for the SUR weakened, and farmers became increasingly important political actors. In Phase 3, competitiveness became the dominant policy goal. Environmental protection remained important but was treated as a baseline to maintain rather than an ambition to strengthen. At the same time, the second Von der Leyen mandate is only halfway complete to date. Important decisions on the Food and Feed Safety Omnibus, a potential glyphosate reassessment, and the post-2027 CAP are still pending. Furthermore, this study focused on Commission-level discourse, but future research could examine narratives from other stakeholders, NGOs, industry groups, Member States, to provide a broader picture of the competing narratives surrounding EU pesticide policy.

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