

Commissioner for Agriculture Janusz Wojciechowski

16 May 2023

Commissioner for Environment, Oceans and Fisheries
Virginijus Sinkevicius

PFAS – Consideration of food security and grazing of natural areas

HR Commissioners

We allow us to contact you about our deep concern about the pressure on people and nature with PFAS.

Very recently, in Denmark, PFAS has been found in grass in 60 nature areas owned by the Ministry of the Environment to an extent exceeding the so-called 'indicator values'. Subsequently, PFAS was found in the blood of the animals which graze 43 of these 60 natural areas to an extent that led to grazing (nature conservation) not being carried out in these areas this year, as in previous years. These are 3000 hectares ([link](#)).

The Ministry of Defence also owns a number of natural areas and has now also decided to terminate grazing (nature maintenance) on a number of Forsvaret's nature areas ([Link](#)).

We fear that grazing will also have to stop on larger nature funds and privately owned natural areas as knowledge of PFAS pollution of natural areas increases in the coming time.

As a nature and environmental organisation, we have an unreservedly understanding that food safety for purchasers of meat from grazing animals takes precedence over all other considerations. We therefore see it as undeniable that there is a need to ensure that meat from grazing animals with high levels of PFAS does not reach consumers.

However, as nature organisations, we are also aware that there is also an indisputable biological need to ensure the grazing of these natural areas. And for Natura 2000 sites also a legal obligation under the Habitats and Birds Directives to ensure the 'designation basis' of the respective areas through, inter alia, the necessary delimitation.

In our understanding, there is full agreement that failure to maintain grazing of natural areas could lead to very significant negative impacts on natural areas, including the Natura 2000 sites' designation basis. Even in the short term, negative consequences may follow, which could take years to offset.

We are in a good and constructive dialogue with both the Ministry of the Environment and the Ministry of Food, Agriculture and Fisheries to find a solution that respects both food safety and nature.

An obvious solution is to maintain grazing in the contaminated natural areas of PFAS, ***provided that the meat of*** the grazing animals cannot be sold for human consumption.

However, we understand from the Danish authorities that the current EU legislation provides for eartagging of animals which currently does not allow for a distinction to be made between eartags of grazing animals that can and cannot be marketed for human consumption.

We therefore consider that this issue does not relate solely to Danish matters and that a solution in relation to EU law is therefore necessary.

We see it as an ideal solution both for maintaining food security and for biodiversity in nature areas and for complying with the obligations of the Habitats and Birds Directives to provide, as soon as possible, a legal possibility for differentiated earmarking of grazing animals that differentiates between animals that can be used for human consumption and those that cannot.

We are therefore very much hopeful that, as Commissioners for the areas of food safety and nature, you will urgently bring about a change in the legislation on earmarking so that the grazing of contaminated natural areas of PFAS can resume.

In the short term, we see a need for the Commission's guidance to the Danish authorities on how to adequately comply with grazing as part of the implementation of the obligations under the Habitats and Birds Directives, including whether the Commission has the possibility to grant a temporary derogation from the provisions on earmarking in order to maintain grazing.

On behalf of the Danish nature organisations listed below,

Friendly greetings

art.4(1)(b) - personal data redacted

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Danish Society for Nature Conservation

A copy of this letter should be sent to

European Parliament Committee on the Environment, Public Health and Food Safety (ENVI).

Minister for the Environment Magnus Heunicke

Minister for Food Jacob Jensen

Minister of Defence (Acting) Troels Lund Poulsen

Danish Parliament's Environment and Food Committee

European Affairs Committee of the Danish Parliament

Overview of the organisations behind the letter

Danish Society for Nature Conservation

DoF BirdLife Denmark

Danish Sports Angling Association

Dansk Botanisk Forening

Animal Protection

Entomological Association

Nature Youth

Svampeforeningen

World Forests

Green Transition Denmark