



Pesticide  
Action  
Network  
Europe



**Veblen Institute**  
for Economic  
Reforms



To:

Ms Claire Bury Deputy  
Director-General responsible for Food sustainability  
Rue Breydel 4,  
1040 Brussels, Belgium

Brussels, 15 January 2026

**Subject:** Call for the extension and amendment of France's National Interim Protective Measure (Decree of 5 January 2026)

Dear Ms Bury,

On 20 January, the EU Standing Committee on Plants, Animals, Food and Feed (SCoPAFF) will meet to discuss the possible extension, amendment, or abrogation of the national interim protective measures adopted by France in its decree of 5 January 2026. These measures suspend the import and marketing of certain foodstuffs from third countries that contain residues of five pesticide substances prohibited in the European Union.

With this letter, we call on the Commission to extend this decision across the entire European Union territory. Furthermore, we advocate that similar measures should be applied to any substances banned within the EU due to their failure to meet the approval criteria under Regulation (EC) No. 1107/2009, in line with the European Commission's commitment to end double standards and while waiting for the Commission to do so.

The substances targeted by the French decree (carbendazim, mancozeb, glufosinate, benomyl, and thiophanate-methyl), are not approved in Europe because they pose clear health concerns. They are classified under Regulation (EC) No. 1272/2008 as carcinogenic, mutagenic, or toxic for reproduction (CMRs) and/or meet the scientific criteria to identify endocrine-disrupting substances under Regulation (EC) No. 1107/2009. As a result, all of these substances meet at least one of the hazard-based "cut-off" criteria laid down in points 3.6.2 to 3.6.5 of Annex II of Regulation (EC) No. 1107/2009. Under the hazard-based approach of the Regulation, no exposure to humans should be allowed. In accordance with Article 54 of Regulation (EU) No 178/2002, there is a clear reason to support and extend this measure.

Specifically, mancozeb is an endocrine disruptor for humans, a reproductive toxicant (Category 1B) and a suspected carcinogen (Category 2). Carbendazim is a reproductive toxicant (Category 1B) and mutagen (Category 1B). Glufosinate is a reproductive toxicant (Category 1B). Thiophanate-methyl is an endocrine disruptor, a suspected carcinogen, and a suspected mutagen (Category 2). Benomyl is a reproductive toxicant and probable mutagen (Category 1B). These compounds are also related, as the breakdown product of thiophanate-methyl and benomyl is carbendazim.

The French decision constitutes a first step towards aligning food quality standards, whether it is produced in Europe or abroad. At the same time, it responds to concerns about unfair competition faced by European farmers by attempting to reduce existing double standards.

Such measures should be applied broadly to all imported agricultural products (whether intended for human food, animal feed, or for energy and ornamental uses) for any substance banned in the EU for health or environmental protection reasons. While the Commission has already committed, under the Vision of Agriculture and Food, to establishing the same EU standards for pesticide residues in imported food, its recent proposal, under the food and feed safety omnibus, remains limited and insufficient. The proposal allows the rejection of applications or the revocation of existing Maximum Residue Levels (MRLs) for EU-banned pesticides that meet one of the “cut-off” criteria of Regulation (EC) No. 1107/2009. However, it is framed as a derogation, is conditional on an impact assessment, and applies only to a small subset of banned pesticides that are harmful for human health and the environment, those meeting the “cut-off” criteria of Regulation (EC) No. 1107/2009.

In line with the Commission’s commitment to act on residues of EU-banned pesticides in imported products, we urge the Commission to propose the **extension and amendment of France’s national interim protective measure across the EU**, ensuring consistency in food safety standards and robust protection for consumers, farmers, and the environment.

Thank you for your attention and consideration.

Yours sincerely,

Angeliki Lysimachou  
Head of Science and Policy  
PAN Europe

**On behalf of:**

Foodwatch  
PAN Europe  
Veblen Institute for Economic Reforms