



Att: **Mr Darragh O'Brien**
Minister for Climate, Energy and the
Environment, Minister for Transport

Cc: **Mr Thomas Byrne**
Minister of State at the Department of
the Taoiseach, the Department of
Foreign Affairs and Trade and at the
Department of Defence

Ms Helen McEntee
Minister for Defence, Minister for
Foreign Affairs and Trade

Subject: Ireland's EU Council Presidency: Advancing EU Action to End the Export of EU-Banned Pesticides

Dear Ministers O'Brien, McEntee and Byrne,

On behalf of the End Toxic Pesticide Trade Coalition, we would like to congratulate Ireland on its upcoming Presidency of the Council of the European Union and wish you every success in steering the Council's work in the months ahead.

We are writing to encourage the Irish Presidency to actively work with member states to demand the European Commission to deliver the long overdue legislative proposal to end the export of hazardous pesticides banned in the European Union. Progressing with this issue will end a double standard that is unacceptable from an ethical perspective, improve the protection of human health and the environment in third countries and benefit the EU economy by promoting sustainable agriculture and innovation towards safer alternatives to toxic pesticides.

The European Commission (EC) had committed in 2020¹ that the EU will "lead by example, and, in line with international commitments, ensure that hazardous chemicals banned in the European Union are not produced for export, including by amending relevant legislation if and as needed." The initiative was expressly welcomed by the European Council in March 2021².

However, while the Commission has conducted preparatory work, organised a public consultation and commissioned an impact assessment, its commitment to produce a legislative proposal by 2023 remains unfulfilled.

Despite support by the European Citizens³ and several Environment Ministers⁴ who called on the European Commission to act to stop these toxic exports, these requests have gone unanswered: to date, neither a legislative proposal nor a finalised impact assessment has been published.

¹ https://environment.ec.europa.eu/strategy/chemicals-strategy_en

² <https://www.consilium.europa.eu/media/48827/st06941-en21.pdf>

³ EU petition: 311,674 signatures to Stop EU double standards
<https://action.eko.org/a/outlaw-exports-of-banned-chemicals>

⁴ [December 2024: Letter to Commissioner Roswall](#)

At the same time, recent evidence points to a worrying trend: a sharp rise in EU exports of pesticides that are banned for use within the Union, despite previous commitments by the European Commission to address the issue. Indeed, in 2024 EU Member States authorised the export of nearly 122,000 tonnes of pesticides prohibited on their own farms due to risks to human health and the environment. This marks a significant increase compared with the 81,000 tonnes exported in 2018⁵.

This practice not only exposes vulnerable populations in importing countries, often with weaker and outdated safety laws, to hazardous substances, but also undermines the EU's own policy objectives, including the commitment under the Chemicals Strategy for Sustainability (CSS) and Vision for Agriculture and Food. Furthermore, it creates a "boomerang effect", whereby residues of these substances return to the EU via imported food and feed, raising concerns for public health, environment (during the production) and fair competition for European farmers. A recent legal opinion confirms that the EU practice of allowing residues of banned pesticides in imported food is highly questionable from an EU legal perspective⁶.

In light of the continued inaction by the Commission, strong leadership from the Council Presidency is essential to ensure progress. We therefore respectfully urge the Irish Presidency to use its role to:

- encourage the European Commission to publish, without further delay, the long-awaited legislative proposal to end the export of pesticides banned in the EU; and
- facilitate discussions among Member States and prepare the ground for swift legislative action.

We believe that decisive engagement by the Irish Presidency would send a clear signal that the European Union is committed to aligning its internal standards with its external actions, and to addressing this double standard in a credible and effective manner.

Enclosed you will find a [Joint Statement](#), signed by more than 600 organisations worldwide, calling for an end to the export of EU-banned pesticides.

We would also welcome the opportunity to meet with the IE Presidency to further discuss this important issue, provide additional information, and exchange views. In the meantime, we remain at your disposal to support your work in any way that may be useful.

Thank you for your attention and commitment.

On behalf of the End Toxic Pesticide Trade Coalition

Your sincerely,

Angeliki Lysimachou

Head of Science and Policy

Pesticide Action Network Europe

⁵ [September 2025: Public Eye/Unearthed report on the export of hazardous pesticides](#)

⁶ April 2026. [Residues of pesticides banned in the EU in imported food: ending a dangerous and unjust double standard](#)