



Brussels, 3 July 2026

Att: **Mr Manol Genov**  
Minister for the Environment and Water  
Bulgaria

**Subject: Advancing EU action to end the export of EU-banned pesticides during the Irish EU Council Presidency**

Dear Minister Genov,

We are writing to you on behalf of the End Toxic Pesticide Trade Coalition regarding the European Commission's commitment to stop the export of pesticides banned for use within the European Union and end this double standard.

According to the recent news<sup>1</sup>, the European Commission has indicated that it does not intend to prepare a legislative proposal to prohibit the production and export of EU-banned pesticides to third countries. Instead, the Commission appears to favour measures aimed at improving the functioning of the Rotterdam Convention, such as strengthening Prior Informed Consent (PIC) notifications and related procedures.

While improvements to the implementation of the Rotterdam Convention may contribute to greater transparency, they cannot address the fundamental problem at stake. The current system merely informs importing countries about hazardous substances; it does not prevent the export of pesticides that the European Union itself has determined are too dangerous to be used within its own borders.

The Commission's decision to abandon the legislative initiative is especially problematic given that extensive preparatory work has already been carried out, including public consultations and an impact assessment process. To date, however, neither the impact assessment nor any legislative proposal has been published.

What is particularly concerning is that the arguments now being put forward by the Commission closely reflect those of the agrochemical industry that focus on the potential economic losses for the pesticide industry. These arguments overlook the ethical inconsistency of allowing the continued production and export of dangerous pesticides that have been banned in the EU due to unacceptable risks to human health or the environment. They also fail to adequately consider the documented impacts these have on farmers, workers, communities, particularly children, biodiversity, water resources and ecosystems in importing countries. In the meantime the situation is getting worse. In 2024 alone, the 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 2018<sup>2</sup>. A recent UNICEF report highlights that as the use of pesticides globally has doubled since the 1990s, about 20% of children under the age of five are now exposed, and more than one child a day dies from pesticide poisoning<sup>3</sup>.

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<sup>1</sup> <https://danwatch.dk/magtfuld-giftlobby-fik-bremset-forbud/>

<sup>2</sup> [September 2025: Public Eye/Unearth report on the export of hazardous pesticides](#)

<sup>3</sup> [UNICEF, 2026. Underestimated and overlooked. The silent impact of pesticides on children.](#)

This practice is also problematic because it creates a “boomerang effect”, where the residues of the EU-banned substances return to the EU as residues in imported food and feed<sup>4</sup>, raising concerns for public health and environment (during the production), European consumers' health 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 perspective<sup>5</sup>.

The exports not only cause serious harm to human health, biodiversity, and ecosystems in importing countries, but also undermine the credibility of the European Union and weaken citizens' trust in European institutions. The abandoning its commitments in this regard means that the EU applies different standards internally and externally, a practice which has been criticised as neo-colonialism. This is unacceptable given the EU's stated objectives under the Chemicals Strategy for Sustainability<sup>6</sup>, the Zero Pollution Action Plan<sup>7</sup>, and Vision for Agriculture and Food<sup>8</sup>, where it has committed to promoting the same high standards of protection globally, alongside broader commitments to sustainability, biodiversity protection, environmental justice, human rights and global health protection.

A [Joint Statement](#), signed by more than 600 organisations worldwide, calling for an end to the export of EU-banned pesticides, shows a global recognition for the need for action.

As Ireland prepares to assume the Presidency of the Council of the European Union, this is an important opportunity to maintain and strengthen political momentum on this issue.

We are therefore writing to kindly ask you to engage with the upcoming Irish Presidency and urge it to:

- prioritise discussions on ending the export of EU-banned pesticides during its Presidency, instead of offering measures that will not solve the initial issue;
- request a clear explanation from the Commission regarding its apparent decision not to proceed with the promised legislative proposal;
- encourage the European Commission to publish, without further delay, the long-awaited study and impact assessment; and
- push the Commission to deliver the legislative proposal to end the export of pesticides banned for use within the European Union.

In light of the Commission's continued inaction, leadership from supportive Member States remains essential to ensure political progress on this issue. A coordinated action by supportive Member States can play a decisive role in ensuring that the European Union addresses this long-standing double standard.

We would also welcome the opportunity to meet with your Ministry to further discuss this important issue, provide additional information, and exchange views. In the meantime, we remain at your disposal to provide more information or any kind of support.

Thank you again for your engagement and commitment.

Yours sincerely,

On behalf of the End Toxic Pesticide Trade Coalition

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<sup>4</sup> [May 2026: Banned Pesticides on the Menu](#)

<sup>5</sup> [April 2026. Residues of pesticides banned in the EU in imported food: ending a dangerous and unjust double standard](#)

<sup>6</sup> [https://environment.ec.europa.eu/strategy/chemicals-strategy\\_en](https://environment.ec.europa.eu/strategy/chemicals-strategy_en)

<sup>7</sup> [https://environment.ec.europa.eu/strategy/zero-pollution-action-plan\\_en](https://environment.ec.europa.eu/strategy/zero-pollution-action-plan_en)

<sup>8</sup> [https://agriculture.ec.europa.eu/overview-vision-agriculture-food/vision-agriculture-and-food\\_en](https://agriculture.ec.europa.eu/overview-vision-agriculture-food/vision-agriculture-and-food_en)

Angeliki Lysimachou  
Head of Science and Policy  
Pesticide Action Network Europe