



Ms. Jessika Roswall

Commissioner of Environment, Water Resilience and a Competitive Circular Economy

Rue de la Loi / Wetstraat 200

1049 Brussels, Belgium

Cc: Mr. Christophe Hansen, Commissioner for Food and Agriculture

Brussels, 9 October 2025

Subject: Renewed request for urgent action and meeting – End Toxic Pesticide Trade Coalition

Dear Commissioner Roswall,

We, the undersigned organisations of the **End Toxic Pesticide Trade Coalition**, are writing to you once again to reiterate our call for the European Commission to fulfil its commitments and take decisive action to stop the production and exports of pesticides that are banned in the EU. In January this year, we wrote to you requesting a meeting and urging the Commission to act. Today, we want to share with you the new evidence underscoring the urgency for the EU to act.

A recent assessment of ECHA export data by *Public Eye*¹ and *Unearthed*² shows that in **2024 EU Member States approved the export of almost 122,000 tonnes of pesticides**

¹<https://www.publiceye.ch/en/topics/pesticides/sharp-rise-in-eu-export-trade-in-banned-pesticides-despite-european-commission-promises>

²<https://unearthed.greenpeace.org/2025/09/23/eu-banned-pesticide-trade-expands-despite-promises>

banned within the EU. The number shows a shocking 50% increase compared to 2018, and more than a doubling when Brexit is accounted for. In total, **75 banned pesticides** were notified for export, including highly hazardous substances such as 1,3-dichloropropene, glufosinate, picoxystrobin, mancozeb, and neonicotinoids that the EU itself has recognised as posing unacceptable risks to human health and/or biodiversity.

These findings confirm what more than **600 organisations worldwide have already stated in a Joint Statement**³: that the EU must stop this harmful and unfair trade and live up to its commitment to lead by example in protecting human health and the environment. Civil society continues to call on the action⁴.

This was recently reiterated by the UN Special Rapporteurs on toxics and human rights, and on extreme poverty and human rights⁵, who called ending the exports of banned pesticides a 'moral imperative'. They condemned the practice as 'a blatant violation of human rights' and urged European institutions and all governments to take action.

The credibility of the EU's leadership in chemicals and pesticide policy is at stake. Therefore, we urge the European Commission to:

1. Publish without further delay the results of the impact assessment launched in 2023, with a clear timeline for next steps.
2. Present a legislative proposal before the end of 2025 to prohibit the manufacture and export of pesticides banned in the EU.
3. Enforce 'zero-tolerance' for residues of EU-banned substances in imported food by lowering the Maximum Residues Levels to below the default limit of quantification (LOQ), ensuring that hazardous chemicals banned in Europe are not allowed in the production of imported food.

We also renew our request for a meeting at your earliest convenience to present our coalition's evidence and recommendations, and to engage in a constructive dialogue on this important matter.

Thank you for considering our request. We look forward to the opportunity to meet with you and discuss these issues further.

Sincerely,

On behalf of the End Toxic Pesticide Trade Coalition:

Dr. Angeliki Lysimachou
Head of Science and Policy
PAN Europe

³<https://www.pan-europe.info/resources/letters/2025/06/ngos-and-trade-unions-demand-end-eu%E2%80%99s-production-export-and-import-banned>

⁴<https://www.pan-europe.info/blog/close-toxic-loopholes-stop-hazardous-exports-save-biodiversity>

⁵ June 2025, Op-Ed. [Europe Must End The Double Standards In Toxic Pesticides Exports](#). Marcos A Orellana (UN Special Rapporteur on toxics and human rights) and Olivier De Schutter (UN Special Rapporteur on extreme poverty and human rights)

In alphabetical order:

Action Aid
Broederlijk Delen
Child Rights International Network (CRIN)
Corporate Europe Observatory (CEO)
Dreikönigsaktion der Katholischen Jungschar (DKA Austria)
Ekō
Foodwatch international
Friends Of The Earth Europe
Human Rights Watch
Humundi
PAN International
Pesticide Action Network Europe
Pestizid Aktions-Netzwerk (PAN Germany)
PublicEye
Veblen Institute