



Danish Presidency of the Council of the EU  
 General Secretariat of the Council  
 Rue de la Loi / Wetstraat 175  
 B-1048 Brussels, Belgium

Brussels, 9 October 2025

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

Dear Minister Heunicke,

We, the undersigned organisations of the End Toxic Pesticide Trade Coalition, are writing to you to ask for your support to call on the European Commission to fulfil its commitments and take decisive action to stop the production and export of pesticides banned in the EU. In January this year, we wrote to Commissioner Roswall, and in July to President von der Leyen, urging the Commission to act. Today, we want to share with you the new evidence underscoring the urgency for action.

A recent assessment of ECHA export data by *Public Eye*<sup>1</sup> and *Unearthed*<sup>2</sup> shows that in **2024, EU Member States approved the export of almost 122,000 tonnes of pesticides banned within the EU**. The number shows a shocking 50% increase compared to 2018, and more than a doubling once Brexit is accounted for. In total, **75 banned pesticides** were notified for export, including highly hazardous substances such as 1,3-dichloropropene,

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

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

glufosinate, picoxystrobin, mancozeb, and neonicotinoids that the EU itself has recognised as posing unacceptable risks to human health and biodiversity.

These findings confirm what more than **600 organisations worldwide have already stated in our Joint Statement**<sup>3</sup>: 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 for action<sup>4</sup>.

This was recently reiterated by the UN Special Rapporteurs on toxics and human rights, and on extreme poverty and human rights<sup>5</sup>, 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.

In the context of Denmark's EU Council Presidency, and following up on your letter to Commissioner Roswall from [December 2023](#), which was supported by seven Member States, we call on you to:

1. Place this issue high on the Council's agenda and facilitate a strong, united Member State demand for urgent EU-level action.
2. Urge the European Commission to **publish without delay the results of the impact assessment launched in 2023**, with a clear timeline for next steps.
3. Support the presentation of a **legislative proposal** to prohibit the manufacture and export of pesticides banned in the EU as soon as possible.
4. Ensure that '**zero-tolerance**' **Maximum Residue Levels (MRLs)** are enforced for EU-banned substances, so that their residues are not allowed in imported food.

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

Sincerely,

On behalf of the End Toxic Pesticide Trade Coalition:

Dr. Angeliki Lysimachou  
Head of Science and Policy  
PAN Europe

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

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

<sup>5</sup> 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