



Brussels, 4 June 2026

Att: **Mr Serge Wilmes**  
Ministry of the Environment, Climate  
and Biodiversity  
Luxembourg

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

Dear Minister Wilmes,

On behalf of the End Toxic Pesticide Trade Coalition, we would like to sincerely thank your Ministry for its previous engagement<sup>1</sup> regarding the need to end the export of pesticides banned in the European Union to third countries.

The joint letter sent to Commissioner Roswall in December 2024 delivered a strong and important political message urging the European Commission to act: the current double standard, prohibiting hazardous pesticides within the EU while continuing the production and export to third countries, is unacceptable from an ethical, environmental, public health, and human rights perspective.

Until today, despite preparatory work, public consultations, and an impact assessment process, the Commission has still not delivered the promised legislative proposal, or published the impact assessment.

The continued delay is particularly concerning given the increasing exports of EU-banned pesticides. 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>.

In addition, this practice is 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>3</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>4</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. Continued delays in delivering on the EU's commitments risk

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<sup>1</sup> [A joint ministerial call to the EU Commission to stop exports of banned chemicals](#)

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

<sup>3</sup> [May 2026: Banned Pesticides on the Menu](#)

<sup>4</sup> [April 2026: Residues of pesticides banned in the EU in imported food: ending a dangerous and unjust double standard](#)

maintaining the perception that the EU applies different standards internally and externally, despite its stated objectives under the Chemicals Strategy for Sustainability<sup>5</sup>, the Zero Pollution Action Plan<sup>6</sup>, and Vision for Agriculture and Food<sup>7</sup>, and 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, we believe there is now 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;
- 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

Angeliki Lysimachou  
Head of Science and Policy  
Pesticide Action Network Europe

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<sup>5</sup> [https://environment.ec.europa.eu/strategy/chemicals-strategy\\_en](https://environment.ec.europa.eu/strategy/chemicals-strategy_en)

<sup>6</sup> [https://environment.ec.europa.eu/strategy/zero-pollution-action-plan\\_en](https://environment.ec.europa.eu/strategy/zero-pollution-action-plan_en)

<sup>7</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)