



Mr. Christophe Hansen
 Commissioner for Food and Agriculture
 European Commission
 1049 Brussels, Belgium

10/02/2025

Subject: Prevent the EU's double standards for residues of banned pesticides in imported food

Dear Commissioner Hansen,

We, the undersigned civil society groups, are writing to express our strong support following your statement at the Agricultural and Fisheries Council on 27th of January, in which you committed to ensuring that **food imported into the EU meets the same standards as food produced within the EU**. In this regard, we call on you to take action under the EU Vision for Agriculture and Food to ensure – to the fullest extent possible – that imported food is not grown using pesticides banned in the EU.

The Commission has already pledged –through the Pesticide Regulations (2020 revision)¹, the Chemical Strategy for Sustainability², and international agreements³– to promote phasing out globally hazardous pesticides no longer approved in the EU, to stop their export, and to consider both human health and environmental risks when assessing limits of pesticide residues in food for trade purposes. Yet, these commitments remain unfulfilled.

EU policies continue to allow residues of banned pesticides in imports, while they permit the export of pesticides deemed too dangerous to be used in Europe to third countries.

Addressing these EU double standards is essential to ensure fair competition for European farmers, but also protect consumer health, and take a firm stand against Human Rights violations, given the devastating impact of these pesticides on the health of local communities and the pollution of natural resources and ecosystems.

Residues of banned pesticides in Imported Food

In 2022, 69 banned and hazardous pesticides were detected in food sold in the EU⁴, with 53 exceeding the EU maximum residue limits (MRLs). Imported items had higher contaminated rates, particularly tea (42%), coffee (25.6%), legumes (16.6%) and spices (15.8%). Similarly, a study in the Netherlands, found that in 2023, 8% of Dutch supermarket products contained residues from 25 banned pesticides⁵.

Among the most frequently detected pesticides in the EU were carbendazim, a fungicide classified mutagenic and toxic to reproduction, as well as clothianidin, thiamethoxam and imidacloprid, that are bee-killing and neurotoxic neonicotinoid insecticides.

Thus, European consumers unknowingly consume these hazardous pesticides, potentially putting their health at risk — particularly pregnant women, infants, and children. In the meantime, EU farmers face unfair competition as the EU imports food grown with dangerous, banned pesticides, that they are -rightfully- no longer allowed to use.

Export of EU-banned pesticides – an unethical practice

Despite banning hazardous pesticides within its territory, the EU continues to allow European companies to export these substances to third countries with weaker safety laws.

¹ Report from the European Commission to European Parliament and Council Evaluation of Regulation (EC) No 1107/2009 on the placing of plant protection products on the market and of Regulation (EC) No 396/2005 on maximum residue levels of pesticides (point 15)

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0208>

² Chemical Strategy for Sustainability (point 2.5) https://environment.ec.europa.eu/strategy/chemicals-strategy_en

³ UNEP Global Framework on Chemicals (<https://www.chemicalsframework.org/about/overview>)

⁴ PAN Europe report, 2024 “Double Standard, Double Risk”

<https://www.pan-europe.info/resources/reports/2024/09/double-standards-double-risk-banned-pesticides-europe%E2%80%99s-food-supply>

⁵ Foodwatch report 2024

<https://www.foodwatch.org/en/foodwatch-calls-on-eu-commission-to-stop-export-of-harmful-pesticides-already-banned-in-europe>

In 2018 alone, over 81,000 tonnes of pesticides containing 41 banned hazardous substances were exported from European factories for agricultural use in third countries⁶. This increased to approximately 120,000 tonnes in 2022.⁷ Additionally, every year, more than 10,000 tonnes of ‘bee killing’ neonicotinoid insecticides are exported to poorer countries, despite being banned in the EU to protect pollinators⁸. In these importing countries the risk of human and environmental exposure is much higher with serious consequences to the health of farmers, local communities and biodiversity, as UN agencies have warned.⁹

Regulatory loopholes and inconsistencies

The EU Pesticide Regulations (Pesticide Regulation 1107/2009 and MRLs Regulation 396/2005) state that pesticides and their residues must not cause any harm to human and animal health or the environment. When a pesticide poses a serious health risk, the Maximum Residue Levels (MRLs) must be “deleted” — meaning they should be lowered to the default Limit of Quantification (LOQ) of 0.01 mg/kg. Furthermore, ‘import tolerances’ cannot be granted for substances banned due to health concerns.

Yet, due to loopholes in EU pesticide policies, currently, about 65 EU-banned pesticides have MRLs above the default LOQ. This means their residues are still legally permitted in imports, even for substances classified as highly hazardous to human health¹⁰. Previously granted import tolerances and Codex (CXL) limits have remained in place to please trade partners.

Support from the Parliament and Council

In the past year, the European Parliament has opposed three Commission’s proposals to maintain MRLs for highly toxic pesticides following their EU ban¹¹. Recently, the Parliament urged for lowering all MRLs to LOQ for three very toxic pesticides, including the widely detected carbendazim (a mutagenic and toxic to reproduction substance). However, the Commission so far has failed to act, keeping consumers exposed to harmful pesticides and maintaining an unfair playing field for EU farmers¹².

⁶ PublicEye, Uneathed 2020. <https://www.publiceye.ch/en/topics/pesticides/banned-in-europe>

⁷ Unpublished data

⁸ Public Eye, Uneathed 2021.

<https://unearthed.greenpeace.org/2021/11/18/revealed-europe-and-the-uks-vast-shipments-of-banned-bee-killing-neonics/>

⁹ FAO and WHO. 2019. Detoxifying agriculture and health from highly hazardous pesticides - A call for action. <https://openknowledge.fao.org/server/api/core/bitstreams/ebee16a3-ee53-4f72-af08-7138ef9e012f/content>

¹⁰ PAN Europe, 2024. Policy briefing “Residues of EU-banned pesticides in EU food”

https://www.pan-europe.info/sites/pan-europe.info/files/public/resources/briefings/17042024_Briefing_Residues%20of%20EU-banned%20pesticides%20in%20EU%20food.pdf

¹¹(1) https://www.europarl.europa.eu/doceo/document/E-9-2024-000471_EN.html

(2) <https://www.europarl.europa.eu/news/fr/press-room/20240917IPR24036/pesticides-no-residues-of-eu-banned-products-in-imported-food>

¹² PAN Europe letter to the Commission 2024.

https://www.pan-europe.info/sites/pan-europe.info/files/public/resources/Letters/20241121_Follow%20up%20request%20to%20ban%20residues%20of%20EU-banned%20Carbendazim%2C%20cyproconazole%2C%20thiophanate-methyl%20.pdf

The European Council has also expressed its support for ending the EU double standard¹³, and we welcome its recent agreement to stop the imports of food products grown with banned pesticides.

Our call for action

For five years, civil society groups from both the EU and Global South have urged the EU to put an end to these unethical double standards.^{14,15,16,17} In light of the upcoming EU Vision of Future of Agriculture and Food, we urge you – in collaboration with the Directorates-General for Health, Environment, and Trade – to:

- Ensure that imported food meets the EU standards. Lower all MRLs for EU-banned pesticides to the default LOQ (0.01 mg/kg)
- Ensure that the Commission delivers on its promise to provide measures to stop the production and export of banned pesticides (active substances and products)

The EU must lead by example to achieve an international consensus to end these harmful and unfair practices, promoting sustainable agricultural alternatives that protect human health, the environment, and ultimately, the future of farming. This requires collaboration not only within the EU but also with FAO and international partners.

We look forward to your response and to concrete legislative actions that align with the EU's commitment to public health, environmental protection, and fair trade practices. We would also welcome the opportunity to meet in person to discuss this further and exchange views.

Sincerely,

Angeliki Lysimachou
Head of Science and Policy, PAN Europe

¹³Seven Member States write to Environment Commissioner Roswall
<https://x.com/DKinEU/status/1866854992558125372>

¹⁴ 2020 NGO letter to the Vice President of the Commission
https://www.pan-europe.info/sites/pan-europe.info/files/Banned_pesticides_open_letter.pdf

¹⁵ Joint Statement, 2022 signed by 326 NGOs
<https://www.pan-europe.info/resources/letters/2022/12/joint-statement-ngos-and-trade-unions-demand-end-eu%E2%80%99s-export-banned>

¹⁶ NGO letter of 218 NGOs “Every life counts” to European governments
https://www.pan-europe.info/sites/pan-europe.info/files/public/resources/Letters/Letter%20to%20the%20Council_exp%20ort%20ban_May_2024_signatures_links.pdf

¹⁷ NGO Letter (2024) to Von der Leyen on Toxic Trade
https://www.foodwatch.org/fileadmin/-INT/pesticides/2024-12-19_Letter_to_EU_Commission_President_-_Stop_the_toxic_trade.pdf

On behalf of (in alphabetical order)

Ärztinnen für eine gesunde Umwelt (ISDE Austria)

Broederlijk Delen, Belgium

CCFD - Terre Solidaire

Corporate Europe Observatory (CEO)

Eco Hvar, Croatia

Ecologistas en Acción, Spain

Ekō

European Environmental Bureau (EEB)

Fondation pour la Nature et l'Homme

Foodwatch International

Friends of the Earth Europe

Friends of the Irish Environment

Génération Futures, France

Humundi, Belgium

Mouvement Ecologique, Luxembourg

Nature & Progrès, Belgium

Pesticide Action Network Europe

Pesticide Action Network Netherlands

Pestizid Aktions-Netzwerk e.v. (PAN Germany)

Public Eye

Slow Food

Veblen Institute for Economic Reforms

Via Pontica Foundation

ZERO - associação sistema terrestre sustentável, Portugal