Pesticide Action Network Europe

To: Members of the SCoPAFF - Section "Phytopharmaceuticals - Legislation"

Brussels, 30 April 2026

Subject: EU Standing Committee on Plants, Animals, Food and Feed (SCoPAFF); 5-6 May 2026; position of Pesticide Action Network (PAN) Europe

Dear Members of the Standing Committee on Plants, Animals, Food and Feed,

On 5-6 May, you are invited to the EU Standing Committee on Plants, Animals, Food and Feed to discuss and potentially adopt opinions on several European Commission proposals. Ahead of this meeting, we would like to share PAN Europe's position on key issues concerning human health and environmental protection from pesticides. We kindly request that you give these matters your careful attention.

Agenda issues

1. Draft Commission Implementing Regulation (EU) renewing the approval of the active substance **mecoprop-P** (B.05)
2. Draft Commission Implementing Regulation (EU) amending Regulation (EU) No 540/2011 as regards the extension of the approval periods of a series of active substances (B. 10)
3. Draft Commission Implementing Regulation (EU) amending Regulation (EU) No 540/2011 as regards the extension of a series of a series of active substances (B. 11)
4. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance **flutolanil** (C.01)
5. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance **buprofezin** (C.02)
6. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance **pirimicarb** (C.03)
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8. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance **triclopyr** (C.05)
9. Draft Commission Implementing Regulation (EU) concerning the renewal of the approval of the active substance **phosphine** (C.06)
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11. Draft Commission Implementing Regulation (EU) concerning the non-approval of the active substance **benzobicyclon** (C.08)

12. EFSA conclusions: cinmethylin, penoxsulam, halosulfuron-methyl, diflufenican (A.04)
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14. AOB: New legal opinion on banned pesticide residues in imported food

1. Draft Commission Implementing Regulation (EU) renewing the approval of the active substance mecoprop-P (B.05)

In October 2023, EFSA published its updated peer-review conclusions on mecoprop-p and identified a critical area of concern related to resident exposure. The predicted exposure for children entering treated areas exceeds the AOEL (75th percentile), even when applying a 10-metre buffer strip and drift-reduction measures during application. This finding clearly demonstrates that the conditions set out in Article 4 of Regulation (EC) No 1107/2009 are not fulfilled, in particular the requirement that plant protection products and their residues “shall not have any harmful effects on human health, including that of vulnerable groups” (Recital 24; Article 4(2) and (3)).

In addition, under Regulation (EC) No 1272/2007, mecoprop-p is classified as very toxic to aquatic life (Aquatic Acute 1) and very toxic to aquatic life with long-lasting effects (Aquatic Chronic 1). It is also classified as harmful if swallowed and as causing serious eye damage. In light of these hazard classifications, it cannot be concluded that the substance does not cause harm to human health or unacceptable effects on the environment.

Despite these serious concerns, the approval of mecoprop-p has been repeatedly extended, amounting to a total prolongation of nine and a half years. It is high time to ensure that citizens, including agricultural workers, as well as the environment, are no longer exposed to this hazardous substance.

We therefore call on you to **reject** the Commission’s proposal to renew mecoprop-p.

2. **Draft Commission Implementing Regulation (EU) amending Regulation (EU) No 540/2011 as regards the extension of the approval periods of the active substances bensulfuron, benzovindiflupyr, chlorotoluron, clethodim, cycloxydim, cymoxanil, dazomet, deltamethrin, diclofop, fenazaquin, fluopicolide, hymexazol, lambda-cyhalothrin, MCPA, MCPB, metaldehyde, metsulfuron-methyl, paclobutrazol and tebuconazole (B. 10)**

The legality of the automatic and repeated extensions of the approvals of active substances has been questioned by PAN Europe and other NGOs. In recent judgements (Cases T-412/22, T-94/23, T-565/23), the General Court clarified that such extensions must be exceptional and temporary in nature and not systematic, as well as tailored to the concrete progress of the risk assessment. Importantly, the Court further clarified that repeated or overly long extensions risk undermining the effectiveness of the renewal system established by the Regulation.

Notwithstanding the Commission's attempts to justify each successive extension and align it with the time required to complete the assessment, the resulting pattern of systematic prolongation is inconsistent with the exceptional and temporary character emphasised by the General Court and is incompatible with both the spirit and the letter of the Regulation. This is particularly so in the case of two substances of concern whose approval periods have been more than doubled as a result of those extensions:

- **Deltamethrin** is proposed for extension for the tenth time. Its initial approval expired in October 2013, and the current proposal would extend it until June 2028, nearly fifteen years beyond the original approval period. This is particularly alarming given that evidence of developmental neurotoxicity has been identified for this substance.
- **Chlorotoluron** is proposed for extension for the ninth time. Its initial approval expired in February 2016, and the current proposal would extend it until June 2028. Under Regulation (EC) No 1272/2007, chlorotoluron is classified as toxic for reproduction category 2 and carcinogenic category 2.

The proposal also includes several other substances of serious concern:

- **Tebuconazole** was found by EFSA in March 2022 to meet the endocrine disruption criteria for humans. It is unacceptable that a “cut-off” substance, which clearly does not meet the approval criteria laid down in Article 4 of Regulation (EC) No 1107/2009 continues to be extended rather than withdrawn from the market without delay.
- **Fluopicolide** and **lambda-cyhalothrin** are both PFAS substances and candidates for substitution (2 PBT criteria). Fluopicolide is additionally classified as toxic for reproduction category 2 under Regulation (EC) No 1272/2007, while lambda-cyhalothrin is classified as highly toxic to the aquatic environment.

The cumulative effect of these prolongations is to maintain hazardous substances on the market for periods far exceeding what was originally envisaged, to the detriment of human health, the environment, and the integrity of Regulation (EC) No 1107/2009.

We therefore call on you to **oppose the extensions proposed for deltamethrin,**

chlorotoluron, tebuconazole, fluopicolide, and lambda-cyhalothrin, and to demand that the Commission provide clear and compelling justification, consistent with the Court's rulings, for any extension it proposes for the remaining substances included in this regulation.

3. **Draft Commission Implementing Regulation (EU) amending Regulation (EU) No 540/2011 as regards the extension of the approval periods of the active substances aclonifen, amisulbrom, Bacillus amyloliquefaciens strain MBI 600, beflubutamid, clomazone, cyantraniliprole, cyprodinil, daminozide, dichlorprop-P, dimethachlor, fludioxonil, formetanate, fosetyl, isofetamid, metalaxyl, metazachlor, penconazole, phenmedipham, pirimicarb, pyraclostrobin and S-abscisic acid (B. 11)**

Our criticism applies equally to this second draft Regulation. It contains substances for which EFSA peer reviews have already been published and have concluded that these substances do not meet the approval criteria laid down in Article 4 of Regulation (EC) No 1107/2009.

Cyprodinil, fludioxonil and phenmedipham have all been identified as endocrine disruptors in accordance with points 3.6.5 and 3.8.2 of Annex II. The proposals for the non-renewal of cyprodinil and fludioxonil are welcome. Such a proposal should be extended to phenmedipham and swiftly adopted by Member States. Similarly, the proposal for non-renewal of **pirimicarb**, for which EFSA identified as a critical area of concern the high risk to aquatic organisms, must be swiftly adopted to ensure no further extension of approval is granted to the substance.

We therefore call on you to **reject** the Commission's draft Regulation.

4. **Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance flutolanil (C.01)**

PAN Europe reiterates its support for the proposal for non-renewal of the approval of flutolanil. Flutolanil meets the OECD definition of PFAS because it contains a trifluoromethyl group (-CF_3) bound to a carbon atom. It has been identified as persistent (P) to very persistent (vP) by EFSA.

Moreover, due to its molecular structure (-CF_3 group), and as confirmed by EFSA, flutolanil eventually breaks down into trifluoroacetic acid (TFA), contaminating crops, soil and water resources. TFA is an ultra-short PFAS, highly persistent, mobile, and soluble in water, which is currently undergoing assessment for its harmonised classification as Persistent, Mobile and Toxic (PMT), very Persistent very Mobile (vPvM) and toxic for reproduction category 1B. The latter proposed classification is based on evidence of clear developmental toxicity, including malformations of the eyes and skeletal system in rabbit offspring. TFA also impacts sperm quality and the thyroid hormone system in rats.

This results in TFA being a 'relevant' metabolite, according to Article 3, point 32 of Regulation (EC) No 1107/2009, which means the 0.1 µg/L groundwater limit applies. Alarmingly, TFA

contamination in groundwater routinely exceeds this limit for relevant metabolites[1] and, in some cases, surpasses even the 10 µg/L threshold for non-relevant metabolites in groundwater[2]. A recent study by Diehle *et al.* has provided the first quantitative estimation of TFA emissions leaching into groundwater as a direct result of crop applications of 24 EU-approved PFAS pesticides, including flutolanil. For flutolanil, when representative uses on flowers and potatoes were considered, the resulting TFA leaching potential was estimated to be high (≥ 10 µg/L) according to the FOCUS modeling approach.

According to recent scientific warnings, TFA poses a serious threat to planetary boundaries, as most of the TFA released today will persist in the environment for future generations. Continued use of TFA-emitting substances will lead to the accumulation of this truly forever chemical in our environment. This constitutes a clear indication of a violation of the Pesticide Regulation (EC) 1107/2009, namely its Article 4(3), stating pesticides shall have no immediate or delayed effects on human health, directly or through drinking water, or on groundwater. TFA-emitting substances, including flutolanil, constitute a clear risk for citizens and groundwater and should be banned.

We call on you to **support** the Commission's proposal for **non-renewal of flutolanil.**

5. **Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance buprofezin (C.02)**

PAN Europe reiterates its support for the proposal for non-renewal of the approval of buprofezin, which has been identified as meeting the endocrine disruption (ED) criteria for humans, in accordance with point 3.6.5 of Annex II to Regulation (EC) No 1107/2009. The substance was found to disrupt the Hypothalamic-Pituitary-Thyroid (HPT) axis, causing adverse effects on thyroid indicated by alternations in thyroid weight and thyroid histopathology. As substances that alter thyroid function may result in neurodevelopmental toxicity, the use of this substance should stop immediately.

We call on you to **support** the Commission's proposal for **non-renewal of buprofezin.**

6. **Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance pirimicarb (C.03)**

PAN Europe reiterates its support for the proposal for non-renewal of the approval of pirimicarb. Pirimicarb has been approved as a candidate for substitution, as it meets two of the criteria for being Persistent, Bioaccumulative and Toxic (PBT). In addition, it is classified as Carcinogen Category 2 and is very toxic to aquatic life. Due to these serious concerns, pirimicarb has been included in PAN Europe's list of the "Toxic 12" pesticides identified for immediate ban since 2021.

In its peer-review conclusions published in September 2024, EFSA confirmed that pirimicarb clearly does not meet the approval criteria laid down in Regulation (EC) No 1107/2009. EFSA identified as a critical area of concern the high risk to aquatic organisms in the majority of

1 Austria, Denmark
2 Germany, Sweden, Switzerland.

assessed scenarios, even when maximum risk mitigation measures were applied, and for all representative uses.

Furthermore, EFSA identified several issues that could not be finalised. The phototoxicity and photomutagenicity potential of pirimicarb could not be excluded. Its developmental neurotoxicity potential has not been adequately addressed. In addition, the consumer risk assessment could not be finalised. Significant data gaps also remain regarding risks to honey bees and other non-target organisms, including soil-dwelling organisms. Moreover, no conclusion could be drawn as to whether pirimicarb meets the criteria for endocrine disruption for non-target organisms.

Taken together, these findings demonstrate that pirimicarb poses unacceptable risks to the environment and potentially to human health. This is in clear contradiction with Article 4 of Regulation (EC) No 1107/2009, which requires that active substances shall have no harmful effects on human health or on the environment.

We call on you to **support** the Commission's proposal for **non-renewal of pirimicarb .**

7. Draft Commission Implementing Regulation (EU) approving pydiflumetofen as a candidate for substitution (C.04)

PAN Europe calls on the Member States to refuse the approval of pydiflumetofen, a succinate dehydrogenase inhibitor (SDHI) fungicide, on the grounds of its very high persistence in the environment, which constitutes an unacceptable effect in itself. This position is fully aligned with growing scientific consensus that persistence alone is sufficient to justify regulatory action, as highly persistent substances inevitably accumulate in the environment, leading to long-term and potentially irreversible impacts on human health and ecosystems. Allowing the approval of such substances directly contradicts the preventive and precautionary principles underpinning EU pesticide legislation.

We call on you to **reject** the Commission's proposal for approval of pydiflumetofen.

8. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance triclopyr (C.05)

PAN Europe reiterates its support for the proposal for non-renewal of the approval of triclopyr. In its peer review conclusions published in July 2024, EFSA identified several critical areas of concern for triclopyr. These consist of a high acute and long-term risk to mammals and a high risk to non-target arthropods.

EFSA also highlighted issues that could not be finalised. Toxicity data necessary to assess risks to aquatic organisms are lacking. Importantly, no safe uses were identified in relation to the exposure of residential children when using the EFSA exposure model, even after applying available risk mitigation measures. Additional data gaps further prevent a comprehensive evaluation of the risks.

These findings indicate that triclopyr poses unacceptable risks to human health and the environment. Its continued approval would therefore be inconsistent with Article 4 of Regulation (EC) No 1107/2009, which requires that active substances must not have harmful effects on human health or the environment.

We call on you to **support** the Commission's proposal for **non-renewal of triclopyr.**

9. Draft Commission Implementing Regulation (EU) concerning the renewal of the approval of the active substance phosphine (C.06)

PAN Europe calls on the Member States to reject the Commission proposal to renew the approval of phosphine. EFSA's peer-review conclusions raise serious concerns that preclude such a renewal, particularly in light of clear evidence of phosphine's clastogenicity. This conclusion is supported by *in vitro* studies, *in vivo* studies in somatic cells, and human biomonitoring data. No threshold-based mode of action has been identified, and as a result, no toxicological reference values could be established. EFSA has recognised the genotoxic potential of phosphine as a critical area of concern. Given this evidence, phosphine cannot be considered to meet the approval criteria for renewal under Regulation (EC) No 1107/2009.

We call on you to **reject** the Commission's proposal for approval of phosphine.

10. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance cyprodinil (C.07)

PAN Europe supports the long-awaited proposal for non-renewal of cyprodinil. The proposal is in line with Article 4(1) and points 3.6.5 and 3.8.2 of Annex II to Regulation (EC) No 1107/2009. Indeed, cyprodinil meets the endocrine disruption criteria for the EAS-modalities for humans and wild mammals and other non-target organisms. The substance leads to clear endocrine-mediated effects on both female and male reproductive health. For humans, cyprodinil was found to induce delayed sexual maturation and decrease ano-genital distance (AGD). This conclusion is considered relevant for wild mammals based on the observed adverse effects on reproductive performance. In fish, cyprodinil increased male vitellogenin levels, resulting in changes in female gonad histology and decreased fecundity and fertilisation success. Moreover, negligible exposure to cyprodinil for humans and non-target organisms was not demonstrated, and the application for an approval by derogation under Article 4(7) was submitted outside the regulatory timeline foreseen in Article 13(5) of Regulation (EU) No 844/2012. There is therefore no legal basis for a renewal.

In addition to the endocrine-disrupting properties of the substance, EFSA identified two other critical areas of concern precluding the renewal of cyprodinil: no safe use exists due to a high long-term risk to mammals and a high risk to aquatic organisms.

We call on you to **support** the Commission's proposal for **non-renewal of cyprodinil.**

11. Draft Commission Implementing Regulation (EU) concerning the non-approval of the active substance benzobicyclon (C.08)

PAN Europe supports the proposal for non-renewal of benzobicyclon, particularly in light of the harmful properties of one of the substance metabolites (1315P-070), in relation to which EFSA identified three critical areas of concern. The predicted exposure estimate to this metabolite is above the AOEL for workers and residents, even when applying all possible risk mitigation measures. Moreover, it poses a high long-term risk both to mammals and to aquatic organisms.

These findings indicate that benzobicyclon poses unacceptable risks to human health and the environment. Its non-renewal is aligned with Article 4 of Regulation (EC) No 1107/2009, which requires that active substances must not have harmful effects on human health or the environment.

We call on you to **support** the Commission's proposal for **non-renewal of benzobicyclon.**

12. EFSA conclusions: cinmethylin, penoxsulam, halosulfuron-methyl, diflufenican (A.04)

Cinmethylin: In December 2025, EFSA concluded that cinmethylin meets the endocrine disruption (ED) criteria for humans for the T-modality, in accordance with point 3.6.5 of Annex II to Regulation (EC) No 1107/2009. Meanwhile, the assessment of cinmethylin's endocrine-disrupting potential for non-target organisms remained inconclusive. Therefore, in line with Article 4 of Regulation (EC) 1107/2009, cinmethylin does not meet the approval criteria to be approved.

According to EFSA the thyroid-mediated adversity was observed in studies of different durations in rats. There was clear and consistent evidence, which consisted of thyroid weight and increased incidence of thyroid follicular cell hypertrophy/hyperplasia, accompanied in one in vivo mechanistic study by decreased T3, decreased T4 and increased TSH indicative of a perturbation of the hypothalamic–pituitary–thyroid (HPT) axis in rats.

We note the applicant's claim that in vitro assays using human liver cells have been developed to exclude the relevance of the observed effects for humans. However, this study is part of the regulatory data requirements, nor is it included in established European and OECD guidance documents. Using it to override the evidence of thyroid adversity observed in multiple established animal studies conducted according to validated protocols is completely unacceptable. Given the potential impact of thyroid disruption on healthy pregnancies, authorising this substance would risk violating EU law, which requires a high level of protection of human health and places particular emphasis on safeguarding vulnerable groups.

In line with Regulation (EC) No 1107/2009, we call on you to **support the non-approval of**

cinmethylin.

Penoxsulam: As highlighted by EFSA in its conclusions, penoxsulam meets the OECD definition of a PFAS and exhibits moderate to high persistence in the environment. Its molecular structure contains a trifluoromethyl (–CF3) group, a moiety well recognised as a precursor of TFA through degradation. The formation of TFA from –CF3-containing substances is a foreseeable and scientifically established transformation route. Although the renewal dossier for penoxsulam did not report TFA formation in plant residue, rotational crop, dietary or soil metabolism studies, the absence of detection cannot be interpreted as evidence that TFA is not formed. Standard degradation studies, such as OECD 307, are limited to 120 days and may be insufficient to detect late-forming degradation products such as TFA, particularly where the parent compound or intermediate metabolites are persistent. In soil metabolism studies, penoxsulam was shown to degrade into several PFAS metabolites that retain the –CF3 group and could therefore be transformed into TFA. Moreover, significant unidentified fractions were observed in certain soil studies, which may include TFA. Consequently, the available data do not exclude TFA formation from the use of penoxsulam, which should have been highlighted by EFSA. Additional methodological limitations further undermine the reliability of the degradation assessment. As previously mentioned, PFAS pesticides that emit TFA into the environment should not be approved, given their potential to contaminate groundwater and TFA's toxicity to reproduction, with a category 1B classification currently under consideration by ECHA.

In light of its classification as a PFAS, and its potential to contribute to TFA emissions, we call on you to **support the non-renewal of penoxsulam**. We also oppose any renewal of the substance for use on rice.

Halosulfuron-methyl: Halosulfuron-methyl has been classified as toxic for reproduction, category 1B, since 2017. Under Annex II, point 3.6.4 of Regulation (EC) No 1107/2009, active substances with this classification shall not be approved, except under very limited conditions: either if human exposure is negligible, or, under Article 4(7), if a derogation is justified by a serious plant health threat that cannot be controlled by other means, including non-chemical alternatives. Despite these clear legal requirements, the approval of halosulfuron-methyl, initially valid from 1 October 2013 to 30 September 2023, has been repeatedly prolonged.

In the present case, the applicant requested a derogation under Article 4(7) for uses on rice and maize in five Member States during the EFSA peer review. However, EFSA concluded that a broad range of non-chemical alternatives is available and that, in many cases, integrated strategies combining chemical and non-chemical methods are feasible. This clearly demonstrates that the conditions for granting a derogation are not fulfilled. Furthermore, the toxicological reference values established for halosulfuron-methyl (ADI, ARfD, AOEL and AAOEL) cannot be considered reliable, as the assessment of endocrine-disrupting properties remains inconclusive. It is deeply concerning that a substance meeting the cut-off criteria for reproductive toxicity has remained on the market for years, despite clear evidence since 2017 that the legal conditions for approval were no longer met.

In line with Regulation (EC) No 1107/2009, we call on you to **support the non-renewal of halosulfuron-methyl.**

Diflufenican meets the OECD definition of a PFAS and degrades into TFA. Evidence from a Danish study conducted by the Geological Survey of Denmark and Greenland (GEUS) demonstrates that, under real-use conditions, diflufenican degrades to TFA in soils, resulting in contamination of groundwater. In one representative use scenario on winter grains, TFA concentrations were measured at 0.12 µg/L, exceeding the EU legal limit of 0.1 µg/L. Moreover, a study by Diehle *et al.*, published on 13 October 2025, identified diflufenican as one of the substances with the highest TFA leaching potential in the EU, particularly for use on cereals (spring and winter).

Although the renewal dossier for diflufenican did not report TFA formation, the data mentioned above indicate that TFA formation and leaching into groundwater are inevitable outcomes of diflufenican use. This constitutes a clear critical area of concern, which should prevent the substance's renewal. EFSA's peer review conclusions failed to address this critical issue, an oversight that we strongly deplore given the clear evidence of TFA formation and its implications for groundwater contamination. EFSA, however, identified a critical area of concern for aquatic toxicity. Taken together, these findings demonstrate that diflufenican poses unacceptable risks to both groundwater and aquatic ecosystems.

In line with Regulation (EC) No 1107/2009, and building on EFSA's conclusions, we call on you to **support the non-renewal of diflufenican.**

13. Draft renewal reports: fenoxaprop-P-ethyl, fludioxonil, phenmedipham (A.05)

Article 4 and points 3.6.5 and 3.8.2 of Annex II of the Pesticide Regulation clearly provide that active substances having endocrine-disrupting properties cannot be approved unless exposure is negligible. Fenoxaprop-P-ethyl, fludioxonil, phenmedipham meet the endocrine disruption (ED) criteria for humans and/or non-target organisms and therefore should be non-renewed.

Fenoxaprop-P-ethyl is an endocrine disruptor for humans through the A-modality. Specifically, it was shown to induce changes in the weights of the prostate, epididymis, and testes, along with alterations in testicular weight.

Fludioxonil meets the endocrine disruption criteria for the EAS-modalities for human health and non-target organisms according to EFSA. Namely, fludioxonil was found to decrease testosterone synthesis and increase estradiol, leading to delayed sexual maturation, decreased anogenital distance in males and increased oestrus cycle in females. These conclusions for humans also apply to wild mammals as non-target organisms. Furthermore, fludioxonil meets the OECD definition of PFAS and was found to be very persistent, raising further concerns about its long-term impact on human health and the environment. Worryingly, fludioxonil was the most frequently detected candidate for substitution in European fruit between 2009 and

2019, according to data from the EU Multiannual Control Programme analysed by PAN Europe. The widespread European consumers' exposure to this hazardous chemical as confirmed by our recent apple testing, with fludioxonil being detected in nearly 40% of the samples.

Phenmedipham meets the endocrine disruption criteria for non-target organisms other than mammals for the T-modality. The substance was found to induce changes in thyroid histology leading to delay in time to reach metamorphosis (amphibian metamorphosis assay).

In line with Regulation (EC) No 1107/2009, we call on you to **support the non-renewal of fenoxaprop-P-ethyl, fludioxonil, phenmedipham.**

14. AOB: New legal opinion on banned pesticide residues in imported food

Finally, we would like to share with you a new independent legal opinion commissioned by PAN Europe, foodwatch, and the Veblen Institute, published on 21 April. It addresses a question that has long been contested: is the Commission empowered, or even obliged, to prohibit residues of EU-banned pesticides in imported food, and are the regulatory limitations it has invoked to justify inaction legally founded? The opinion clearly concludes that, under existing EU law, the Commission not only has the power but the obligation to act. By failing to do so, it is likely already in breach of EU law, particularly with respect to substances banned on public health grounds.

Today, residues of at least 88 substances that are not allowed on the European market remain permitted in imported food, 13% of which are classified as carcinogenic, mutagenic, toxic for reproduction or as endocrine disruptors according to our analysis.

While the Omnibus for Food and Feed Safety Package offers an opportunity for the European Commission to address the situation, unfortunately, the current proposal is too restrictive to do so and is therefore unacceptable for our organisations.

- On the one hand, the Commission proposal to address substances that are banned under the cut-off criteria of Regulation (EC) No 1107/2009 would only cover a minority of substances that are not allowed on the market (22% according to our estimations).
- On the other hand, the necessity to carry out an individual impact assessment before changing an MRL would introduce socio-economic considerations that are neither necessary, nor justified, and would make the process extremely lengthy.

We urge Member States to advocate for clear legal language introducing the automatic lowering of MRLs for all pesticide active substances that are not allowed on the EU market, regardless of the grounds for their non-approval.

Thank you in advance for your consideration of these matters.

Sincerely yours,

On behalf of PAN Europe
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