



Brussels, 29 June 2026

Ms Jessika Roswall

Commissioner for Environment, Water Resilience
and a Competitive Circular Economy
European Commission
Directorate-General for Environment (DG ENV)

Subject: Delivering the European Commission's commitment to end the export of EU-banned pesticides

Dear Commissioner Roswall,

We are writing on behalf of the End Toxic Pesticide Trade Coalition regarding the European Commission's long overdue commitment to end the production and export of pesticides banned for use within the European Union.

We are deeply concerned by recent press reports that the Commission does not intend to proceed with the legislative proposal intended to end the export of the pesticides prohibited for use within the EU, announced in 2020 under the Chemicals Strategy for Sustainability (CSS). According to a declaration by the EC, you are only considering measures aimed at improving the functioning of the Rotterdam Convention, such as strengthening Prior Informed Consent (PIC) notifications and related procedures.

Firstly we would like to know if this reading of your statement is correct? If so, on what basis did the EC make this policy choice?

Secondly, if confirmed, this would indeed represent a major shift from what was a clear commitment made by the European Commission in 2020: to provide measures to ensure that hazardous chemicals banned in the European Union are not produced for export. Since then, the Commission has undertaken extensive preparatory work, including public consultations, studies and an impact assessment process. In the meantime, a number of European countries, EU policy-makers, the UN Rapporteurs on toxics and human rights, as well as the general public, have urged the Commission to act and resolve this unethical double standard. A Joint Statement¹, signed in 2025 by more than 600 organisations worldwide, also called EU to end the export of EU-banned pesticides. Yet six years later, no legislative proposal has been published and the impact assessment remains unavailable to the public.

What is particularly worrying is that the Commission now appears to be replacing the promised solution with measures that on one hand closely mirror the chemical industry's arguments, and on the other hand are not addressing the problem the Commission originally committed to solve.

Improving the functioning of the Rotterdam Convention and strengthening PIC procedures may contribute to greater transparency and information sharing. However, these measures:

¹ [Joint Statement signed by 600+ worldwide organisations](#)

- do not prevent the production or export of pesticides that the European Union itself has determined as too hazardous to be used within its own territory;
- do not eliminate the double standard whereby substances considered unsafe for European farmers, workers, citizens and ecosystems continue to be manufactured in Europe and exported to other parts of the world;
- do not prevent the resulting harm to millions of farmers, agricultural workers, local communities, water resources and biodiversity in importing countries;
- do not address the unfair competitive disadvantage faced by European farmers who are prohibited from using these substances while competing with imported products that may have been produced using them;
- do not ensure safety to the EU citizens nor their trust, due to the content of the banned and hazardous pesticides in imported food produced with those pesticides.^{2,3}
- will disturb trade flows of agricultural products from third countries to Europe, as residues will be detected, which was for example the case the past years with exports from Kenya.

In short, the measures currently being preferred do not solve the existing grave problem. They merely improve the administrative management. Therefore, although the Commission might give the impression it takes violations of human rights seriously, this is not the case as none of these actions resolve the ongoing, big-scale, violations of human rights.

The consequences of maintaining this status quo are significant. In 2024 alone, 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 represents a substantial increase compared with the approximately 81,000 tonnes exported in 2018.⁴

These exports contribute to well documented harms affecting farmers, workers, local communities, particularly children, water resources, biodiversity and ecosystems in importing countries. But, they also generate environmental and health impacts within the European Union itself, at the sites where these hazardous pesticides are manufactured.

The Commission's current approach reflects the arguments of the agrochemical industry while ignoring the substantial evidence documenting impacts on human health, biodiversity, ecosystems, environmental justice and human rights. Such an imbalance means that economic interests are being prioritised over the protection of people and the environment. This will only create reputational damage for the EU.

The industry's main argument is that prohibiting the export of pesticides banned in the EU would harm the European economy, cause substantial job losses among pesticide manufacturers, and provide no benefits for health or the environment in importing countries. Yet this narrative has been exposed as misleading. In France, the pesticide lobby group Phyteis was formally accused by the National Assembly's ethics compliance officer of violating its duty of sincerity, undermining the credibility of the industry's claims.⁵

An export ban would not threaten employment or harm the European economy, as evidenced by a study commissioned by our coalition.⁶ Furthermore, a legal opinion finds that WTO rules do not prevent the EU from introducing an export ban on chemicals that are banned for use within its own territory.⁷

These Commission's actions are leading EU citizens to question institutional credibility and are diminishing public trust. European citizens expect that commitments announced by the European

² [May 2026: Banned Pesticides on the Menu](#)

³ [September 2024: Double Standard, Double Risk](#)

⁴ [September 2025: Public Eye/Unearthed report on the export of hazardous pesticides](#)

⁵ [Veblen Institute: Phyteis, the pesticide lobby, has again been put on notice](#)

⁶ [EU pesticides export ban: What could be the consequences?](#)

⁷ [Legal opinion on a Chemical Export Ban and compatibility with World Trade Organisation Rules](#)

Commission, particularly those concerning the protection of human health and the environment, will be followed by concrete action. When a flagship commitment is abandoned after years of preparatory work, consultations and public engagement, without transparency and without an alternative capable of achieving the stated objective, confidence in European policymaking is significantly weakened.

Failing to explain such a policy reversal, while withholding the completed impact assessment, is inconsistent with the Commission's own Better Regulation principles, which are intended to ensure that policymaking is transparent, evidence-based and accountable.

For all these reasons, we strongly urge the European Commission not to abandon its commitment and to publish, without further delay, the impact assessment as well as a legislative proposal that effectively ends the production and export of pesticides banned for use within the European Union.

We would welcome the opportunity to discuss this matter further and remain at your disposal for any additional information.

Yours sincerely,

On behalf of the End Toxic Pesticide Trade Coalition,

Angeliki Lysimachou
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Pesticide Action Network Europe