

19 December 2024

To: Ursula von der Leyen, the President of the European Commission

Subject: Pesticides banned in the EU and exported to third countries – Status of Commission legislative proposal

Dear President von der Leyen,

We, the 6 undersigned, are deeply concerned about the persistent issue of hazardous pesticides that are banned in the EU but still exported to third countries and the severe ethical, health and environmental consequences for Europe and beyond.

Despite the EU's ban of certain harmful pesticides, these chemicals continue to be produced within the EU, exported to third countries, and used to cultivate food that often ends up back on our plates¹. This practice undermines the ethical, environmental and health standards we strive to uphold in the EU and endangers consumers, farmers, workers, and communities living close to the fields and the environment alike.

In 2020, the European Commission recognised this problem in its Chemical Strategy for Sustainability and committed to halting the production and export of banned pesticides to third countries. Despite the public consultation, support from the civil society² and policy-makers³, the EU Commission has failed to keep its promise and present a legislative proposal by the end of 2023.

While this legislative proposal remains stuck, the damages caused by the unethical trade of banned pesticides are still ongoing and undeniable.

Unethical to farmers and local communities

These exported pesticides are so dangerous that the EU has prohibited their use in our own agriculture. However, with the greenlight from the EU, companies based in the Union can export these substances. Farmers and agricultural workers in third countries, who have no other choices, are using them in the fields, potentially facing severe health risks⁴. Furthermore, the harmful effects

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https://www.pan-europe.info/sites/pan-europe.info/files/public/resources/reports/Report_Double%20standards%2C%20double%20risk.pdf

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<https://www.pan-europe.info/sites/pan-europe.info/files/public/resources/Letters/Joint-Statement-december-2022.pdf>

³ https://www.europarl.europa.eu/doceo/document/E-9-2021-002974_EN.html

4

<https://www.publiceye.ch/en/topics/pesticides/the-brazilian-farmers-poisoned-by-a-syngenta-pesticide-that-is-banned-in-europe>

of these pesticides strike nearby communities and local consumers. At the same time European farmers are placed in an unfair competition.

Damaging to the Environment

If these toxic chemicals are forbidden in the EU, it is because they would contaminate the soil, water, and air and destroy biodiversity. But they would wreak the same havoc elsewhere. Exporting such pesticides essentially condemns entire ecosystems with global impacts that transcend national borders.

Harmful to Consumers

EU consumers expect their food to be safe from toxic chemicals that are banned in the EU, refusing to support an unethical practice. They are not aware that their plates contain such residues through imported food. Allowing MRLs for banned pesticides that are higher than the detection level presents a regulatory loophole causing unnecessary exposure of EU citizens to dangerous pesticides. From a recent report launched by foodwatch Netherlands, NVWA's data revealed that in 2023, 8% of Dutch supermarket products contained residues from 25 types of banned pesticides⁵.

Impact on Human Rights

The export of these dangerous substances violates basic human rights, including the right to health and a safe environment, particularly for vulnerable groups. Agricultural workers in Asia, Africa and America, are disproportionately affected due to inadequate safety standards and lack of protective equipment.

EU countries, such as France and Belgium, have started to ban these exports at national level. But this is not enough. Even with a ban, 7300 tons of forbidden pesticides have been exported from France in 2023⁶, mostly to low income countries who do not have the means to protect their population and environment from the damage they cause.

International commitments and agreements

The EU is a signatory to international treaties such as the Rotterdam Convention, Stockholm convention, Basel Convention and recent Bonn Declaration on hazardous chemicals⁷. Exporting banned pesticides contradicts the spirit of these agreements and undermines global efforts to reduce chemical risks. In 2023 one of the agreed goals of the Global Framework on Chemicals of the United Nations Environment Programme was to stop the use of highly hazardous pesticides (HHPs) in agriculture by 2035.

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https://www.foodwatch.org/fileadmin/-NL/Campagnes_en_campagnethema_s/Schadelijke_stoffen/Gifresten/Foodwatch_-_2024_-_De_Grote_Gifroute_in_beeld.pdf

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<https://www.publiceye.ch/fr/thematiques/pesticides/promesses-non-tenues-les-exportations-de-pesticides-interdits-continuent-depuis-la-france>

⁷ <https://www.chemicalsframework.org/about/overview>

The Commission's delay allows this dangerous situation to be perpetuated. Therefore, we urge the EU Commission to:







1. **End Double Standards** and prohibit the production and export of toxic pesticides formulations and/or active substances banned for use in EU agriculture due to their health and environmental impacts. These hazardous chemicals must not be used anywhere in the world.
2. **Stop the Boomerang Effect**, by legislating for zero tolerance on residues of these banned pesticides in imported foods. No food treated with such substances should end up on the plates of EU citizens.

Addressing this issue is not only a matter of public health and environmental integrity but also a question of global fairness and leadership. The EU must act urgently to uphold its commitment to sustainability and ethical trade practices. **Expressing the commitment to end the export of pesticides banned in the EU in the work programme for 2025, is the first step towards unblocking the legislative process.**

Thank you for your attention to this critical issue. We look forward to your response.

Yours sincerely,

Elena Artico

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