



PAN Europe's feedback to European Commission's Public Consultation “Export and import of hazardous chemicals”

Link:

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14685-Export-and-import-of-hazardous-chemicals_en

Date: 10th August 2025

PAN Europe would like to use this feedback opportunity to raise its concerns on the export of pesticides that have been banned for use in Europe because they can cause serious harm to human health, wildlife and biodiversity, or contaminate water resources. It remains unacceptable for the EU to continue permitting European companies to export pesticides after these are banned in Europe because they are considered too hazardous for use within its own territory. The impacts of these pesticides on local communities and their environmental resources in importing countries where they are used are devastating.

UN rapporteurs - Marcos A Orellana, UN Special Rapporteur on toxics and human rights and Olivier De Schutter, UN Special Rapporteur on extreme poverty and human rights recently called for “European institutions to show leadership at the regional level and act to ban the export of banned pesticides.”¹

“Exposure to hazardous pesticides causes cancers, infertility, diabetes, neurological diseases like Parkinson’s, Alzheimer’s, and disorders of the endocrine and immune systems, among other harms. It affects adults, but also newborns, causing birth defects and congenital malformations, as well as neuro-developmental disabilities including reduced intelligence quotient.”

¹ OpEd “Europe Must End The Double Standards In Toxic Pesticides Exports” *Marcos A Orellana and Olivier De Schutter* July 2, 2025

<https://www.arc2020.eu/europe-must-end-the-double-standards-in-toxic-pesticides-exports/>

They add “People have a right to health and a right to live in dignity. The European practice of exporting banned pesticides is a blatant violation of these fundamental rights.”

A similar message was sent by the Bishops from both Europe and Africa who advocated “for an immediate ban on the export to and use of Highly Hazardous Pesticides in Africa.” They pointed out the injustice that chemicals which are banned in Europe are still produced there and sold to African farmers. “This double standard must end.”²

Yet the current draft amendment proposal of Regulation (EU) 649/2012 fails to address this unethical double standard, despite the European Commission’s 2020 commitment under the “Chemical Strategy for Sustainability” to present new measures to end this practice.

From an ethical point of view, once pesticides are banned in Europe because they are too dangerous for human health, they should be placed in **Annex V of Reg. 649/2012** (“Chemicals and articles subject to export ban”). In line with Article 15.2, chemicals listed under this Annex (and related products) whose use is prohibited in the Union for the protection of human health or the environment should not be exported for use elsewhere. It should be clear that what is too dangerous for human health in Europe is also too dangerous for human health anywhere in the world.

Regarding the current amendments, it is particularly concerning that they include highly toxic pesticide substances such as carbendazim, officially classified as a mutagen (“may cause genetic defects”) and toxic to reproduction (“may damage fertility and the unborn child”), and metribuzin, identified as an endocrine disruptor for human health. Proposing to require only prior informed consent for the export of these chemicals for use as pesticides outside the EU represents a clear failure to protect human health and the environment from such hazardous substances.

More than 600 organisations have already signed a joint statement calling on the European Union to honour its 2020 promise and put an end to the production, export, and residue imports of EU-banned pesticides³. We therefore use this opportunity to urge, once again, that the European Commission end this unethical double standard and adopt measures to prohibit all exports of EU-banned pesticides, in line with the EU’s human rights and environmental principles.

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² 6th African Union (AU) – European Union (EU) Agriculture Ministerial Conference, June 27, 2025
https://agriculture.ec.europa.eu/media/events/6th-african-union-au-european-union-eu-agriculture-ministerial-conference-2025-06-27_en

³ “NGOs and Trade Unions demand the end of EU’s production, export and import of banned pesticides” Joint Statement in EN, FR, SP, GR, PT, NL, IT and DK here:
<https://www.pan-europe.info/resources/letters/2025/06/ngos-and-trade-unions-demand-end-eu%20%99s-production-export-and-import-banned>

Pesticide Action Network (PAN Europe) is a network of NGOs working to reduce the use of hazardous pesticides and have them replaced with ecologically sound alternatives. We work to eliminate dependency on chemical pesticides and to support safe sustainable pest control methods. Our network brings together over 45 consumer, public health and environmental organisations and women's groups from across Europe.



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