



Commissioner Stella Kyriakides  
 European Commission  
 Rue de la Loi / Wetstraat 200  
 1049 Brussels  
 Belgium

Brussels, 11 March 2020

## Pesticide residues in agricultural imports must not compromise public health and the European Green Deal

Dear Commissioner Kyriakides,

The European Commission is currently considering whether residues of certain pesticides that are banned for use in the EU should be allowed on imported products.<sup>1</sup>

The decision comes against the backdrop of the European Green Deal and the Commission's stated ambition to reduce the EU's dependency on pesticides,<sup>2</sup> and to set specific targets to reduce significantly both the use of chemical pesticides and the risk arising from it.<sup>3</sup>

Our organisations fully support this ambition. Furthermore, we believe that EU farmers should not be exposed to unfair competition from abroad if they are to accept and work toward this important objective. For this reason, the EU should not allow the import of agricultural goods that have not been produced to the same high standards as those produced in the EU. Specifically, the EU should not allow the import of products that have been treated with pesticides that are banned in the EU, as stated by Agriculture Commissioner Janusz Wojciechowski.<sup>4</sup>

Under Regulation (EC) No. 396/2005, it is possible for the EU to define a permissible level of residues for pesticides that are not approved for use in the EU in order to "meet the needs of international trade". However, there is no legal obligation for the EU to set such "import tolerances", as confirmed also by the Scientific Service of the German Bundestag.<sup>5</sup>

<sup>1</sup> Le Monde, [L'Union européenne sous pression pour autoriser des pesticides interdits dans les produits importés](#), 17 February 2020

<sup>2</sup> Commission President Ursula von der Leyen, [Mission letter to Stella Kyriakides](#), 10 September 2019

<sup>3</sup> European Commission, [Communication on the European Green Deal](#), 11 December 2019

<sup>4</sup> Finanzen.at, [EU will Agrar-Importe grüner machen](#), 16 January 2020

<sup>5</sup> Wissenschaftliche Dienste Deutscher Bundestag, [Importtoleranzen für Wirkstoffe in Pflanzenschutzmitteln nach Auslaufen der Pflanzenschutzmittelzulassung](#), 28 April 2017

The Regulation states clearly that no import tolerances can be set for pesticides that the EU has banned to protect public health,<sup>6</sup> including for those pesticides that have been (or have to be) classified as mutagenic, carcinogenic or toxic for reproduction (Category 1A or 1B), or are considered to be endocrine disruptors.<sup>7</sup>

We urge the Commission to fully implement these legal provisions, without any exceptions.

In addition, we are asking the Commission to extend this approach to pesticides that have been banned for environmental reasons. We fully support the position of the previous European Parliament that “effects on pollinators and the environment should be taken into account when evaluating MRLs”.<sup>8</sup>

The same approach should also apply to pesticides that were withdrawn from the EU market by their manufacturers when it was found that they no longer meet the EU approval criteria (such as carbendazim, glufosinate and clothianidin).

**In order to protect public health and the environment, and to achieve the objectives of the European Green Deal, the Commission should work to exclude any residues of pesticides for which harmful effects on human or animal health or unacceptable effects on the environment cannot be ruled out.**

Yours sincerely,



Magda Stoczkiewicz  
Deputy Director, Greenpeace European Unit

Also on behalf of:

*International organisations*

Apimondia Bee Health Commission  
Agroecology Europe  
BeeLife  
Corporate Europe Observatory (CEO)  
European Coordination Via Campesina (ECVC)  
Foodwatch International  
Friends of the Earth Europe (FoEE)  
Health and Environment Alliance (HEAL)  
International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Associations (IUF)  
Pesticide Action Network Europe (PAN Europe)  
Slowfood Europe  
SumOfUs  
WeMove.EU  
Women Engage for a Common Future (WECF)

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<sup>6</sup> Regulation (EC) No. 396/2005, Article 3.2(g)

<sup>7</sup> These include linuron, iprodion, propiconazol, chlorothalonil und thiacloprid.

<sup>8</sup> European Parliament, [Objection to an implementing act: Maximum residue levels for several substances including clothianidin](#), 13 March 2019

*National, regional and local organisations*

Arnhem Zoemt (Netherlands)  
Apiservices (France)  
Aurelia Stiftung (Germany)  
Buglife (UK)  
BUND (Germany)  
Comité de Recherche et d'Information Indépendant sur le Génie Génétique (France)  
Earth Thrive (Serbia)  
ECC (Latvia)  
Eco Hvar (Croatia)  
Ecologistas en Acción (Spain)  
Génération Futures (France)  
Global 2000 (Austria)  
GMWatch (UK)  
Justice Pesticides (France)  
Nature et Progrès (Belgium)  
PAN Germany (Germany)  
PAN Italia (Italy)  
PAN UK (UK)  
POLLINIS (France)  
Public Eye (Switzerland)  
Quercus (Portugal)  
ROMAPIS (Romania)  
SOS Polinizadores (Spain)  
The Pollinators (Netherlands)  
Toxic Free Suisse (Switzerland)  
Umweltinstitut München (Germany)  
Union Nationale de l'Apiculture Française (France)  
Via Pontica Foundation (Bulgaria)  
VivoSano (Spain)  
Zemljane staze / Earth Trek (Croatia)