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DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Food Safety, Sustainability, and Innovation
The Director

Brussels
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Ms June Arnold
Head of Policy
The Grain and Feed Trade
Association
E-mail: JuneArnold@gafta.com

Subject: Joint letter of 16 December 2025 on international concerns about revisions to the EU Import tolerance Pesticide Policy

Dear Ms Arnold,

Thank you for the above-mentioned letter (registered under our references Ares(2025)11288283 and Ares(2025)11298930), addressed to the Cabinets of Commissioners Várhelyi and Síkela, who asked me to respond on their behalf. In the letter, the Grain and Feed Trade Association, Global Pulse Confederation, International Organization of Spice Trade Associations, European Spice Association and European Coffee Federation express their concerns regarding revisions to the EU Import tolerance Pesticide Policy.

As you are probably aware, on 16 December 2025 the Commission adopted and published the proposal for a food and feed safety simplification package ⁽¹⁾.

In line with the principle announced in the Vision for Agriculture and Food to ensure that “the most hazardous pesticides banned in the EU for health and environmental reasons are not allowed back to the EU through imported products” ⁽²⁾, the relevant element of the simplification package to which your letter refers, targets the substances of most concern for human health or the environment: substances with mutagenic or carcinogenic effects, substances that are toxic for reproduction, substances with endocrine disrupting properties that may cause adverse effect in humans or in non-target organisms, persistent organic pollutants (POP), persistent, bioaccumulative and toxic (PBT) substances, and very

⁽¹⁾ The relevant documents have been published on this website: [Simplification of legislation - Food Safety - European Commission](#)

⁽²⁾ Vision for Agriculture and Food Shaping together an attractive farming and agri-food sector for future generations. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52025DC0075>

persistent and very bioaccumulative substances (vPvB). This is based on scientific criteria listed in Regulation (EC) No 1107/2009 ⁽³⁾.

Such substances will be identified based on the comprehensive hazard and risk assessments conducted by the European Food Safety Authority and the European Chemicals Agency. Where an appropriate evaluation of the hazardous properties of the substance by the European Food Safety Authority under Regulation (EC) No 1107/2009 is not available, the Commission will ask EFSA for an evaluation under Article 43 of Regulation (EC) No 396/2005.

In the simplification package, and in response to the requests made by several Member States and the European Parliament for the application of the same health and environmental standards to domestically produced and imported products, the Commission has proposed to establish the possibility that MRLs for specific substances with such particularly hazardous properties can be set at the technical zero level (the limit of quantification) on a case-by-case basis, if found appropriate in the light of the outcome of an impact assessment. As part of that assessment, adequate deferral periods and transitional measures to prevent disruptions to trade and allowing trade partners time to adjust will be considered.

The simplification package will now be subject to negotiations by the Council and the European Parliament in view of its adoption.

In addition, as you mentioned in your letter, in November 2025 the Commission launched a study that will provide relevant information for a broader impact assessment on the EU's competitive position and the international implications of the establishment of the principle announced in the Vision for Agriculture and Food. If appropriate, based on the outcome of such impact assessment, the Commission may propose future amendments to the applicable legal framework.

The Commission remains committed to maintaining transparency and dialogue with affected sectors and third countries, including through consultations under the WTO/SPS agreement.

Yours sincerely,

[e-signed]

Klaus Berend

⁽³⁾ Regulation (EC) No 1107/2009 of the European Parliament and of the Council of 21 October 2009 concerning the placing of plant protection products on the market and repealing Council Directives 79/117/EEC and 91/414/EEC (OJ L 309, 24.11.2009, pp. 1–50, <http://data.europa.eu/eli/reg/2009/1107/oj>)