

Cabinet Sikela,
European Commission
DG International Partnerships,
Rue de la Loi 200
B-1049 Brussels

16th December 2025

Subject: International concerns about revisions to the EU Import tolerance Pesticide Policy

Dear Mr Rossi,

We, the undersigned associations' would like to express our concerns about the potential impact of the EU Commission's intention to revise the EU import tolerance policy and amend Regulation 396/2005 on MRLs aiming to eliminate import tolerances for certain substances not authorised in the EU for health and environmental reasons.

Many of our members located in third countries export agricultural commodities to the EU rely on import tolerances which facilitate international trade and are set when there are differences between EU and third country good agricultural practices and deriving MRLs. This is often due to the differing crop conditions after thorough assessment; different regions have different needs when it comes to crop protection against pests and diseases. Tropical and sub-tropical climates have greater need for crop protection products due to pest and disease pressures. Some pesticides not registered in the EU may well be necessary in non-EU countries for different crops or pests that do not exist in the EU.

The EU's Vision for Agriculture and Food has acknowledged the need to "consider the impacts on the EU's competitive position and the international implications and, if appropriate, propose amendments to the applicable legal framework". The EU's commitment was also reiterated in the Press Release on 25th November 2025, which announced the launch of an impact assessment and confirming that it will 'inform further policy action, including a possible legislative proposal to be presented in that regard.' We call on the EU Commission to wait until the conclusion of the impact assessment before drafting any modifications to Regulation 396/2005.

This assessment is fundamental as it is expected to evaluate the competitive advantage or disadvantage created by aligning standards; to examine notable potential impacts on trade flows for the EU, the competitiveness of European producers and the potential impact on consumers and impact on farmers, suppliers and consumers of establishing a closer alignment of production standards that apply to imported products.

As the assessment will inform further policy action, we would urge the College of Commissioners to ensure the impact assessment is completed, next summer 2026, before making substantial changes to current EU legislation.

We thank you in advance for considering the urgency of this matter.

Yours sincerely,

Jaine Chisholm Caunt OBE
Director General Gafta



Vijay Iyengar
President GPC



Laura Shumow
Executive Director
International Organization of Spice Trade Associations



Paolo Patruno
Secretary General
European Spice Association



Eileen Gordon
Secretary General
European Coffee Federation

