Banned Pesticides on the Menu:

Residues Found in Tea, Rice and Spices

LABORATORY TESTS 2026

foodwatch

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1 INTRODUCTION & CONTEXT

The European Union is supposed to have strict rules to ensure that the pesticides that are most harmful for health and the environment are not approved for use on fields and that the presence of their residues on consumers' plates is minimised (through EU Regulation 1107/2009 governing the approval and market access of pesticides active substances and EU Regulation 396/2005 on pesticides residue limits).

Yet, it is common to find residues of pesticides that are not approved in the EU in daily food products. This is because of loopholes in the existing legal framework. First, the EU still allows the production of pesticides not approved in the EU and their trade with other parts of the world. This allows European companies to export substances that are known to have harmful effects on health or wildlife to third countries, such as paraquat, a highly toxic herbicide linked to Parkinson's disease.

Second, residues of those substances also come back onto our plates through a dangerous 'boomerang effect' via imports of food from outside the European Union.

When a pesticide is banned in Europe, **the Commission does not automatically lower the residue limits in food to the minimum** (referred to as the limit of quantification, or LOQ). On the contrary, it regularly introduces tolerance limits based on trade considerations. As a result, the presence of residues of banned pesticides in European food is regularly confirmed by annual monitoring data from the European Food Safety Authority (EFSA) on pesticides residues, as well as product testing carried out by civil society organisations.

For years, foodwatch - alongside hundreds of civil society organisations worldwide - has demanded policy action to change this situation[i].

In 2020, the European Commission committed to stop the trade of chemical substances banned in the EU through the Chemicals Strategy for Sustainability[ii]. But to date, no action has been taken.

When it comes to residues of banned pesticides, at the end of 2025, the European Commission promised to act to stop the 'boomerang effect' as part of the measures presented in its omnibus package on food and feed safety. **Unfortunately, the promised measures are not ambitious enough to truly protect consumers: they would only cover a small portion of pesticide substances and would require an individual impact assessment every time the residue limit of a substance is to be considered.** This is far from the automatic lowering of residue limits that is needed to truly protect consumers from residues of banned pesticides. Meanwhile, the general relaxing of the rules governing the safety assessment of pesticide active substances and the establishment of MRLs by the omnibus would leave consumers more exposed to harmful pesticides and their residues. At the time of writing, the Commission proposals are still being discussed with the European Parliament and Council.

As part of foodwatch campaigning for an overhaul of pesticides-related regulations, we commissioned tests from an independent laboratory on products found to be regularly contaminated by residues of non-approved pesticides (according to recent EFSA monitoring data). The 64 samples tested included products purchased in Austria, France, Germany, and the Netherlands.

This short report presents the results of these tests, which add yet further urgency for EU-wide political action to stop the trade of non-approved pesticides and minimise the presence of their residues in our food products.

2 KEY FINDINGS

- Out of the 64 samples tested, **49 samples contained residues of pesticides** (above the limit of quantification, or LOQ).
- We detected **the presence of 54 different pesticides substances, including 27 pesticides substances that are not approved at EU level**, for a total of 293 detections.
- Most contaminated items were spices (paprika powder, chili, cumin) and green tea.
- 14 out of the 64 samples contained residues of pesticides (whether approved or not) **at levels above the legally allowed limit** (maximum residue limit, or MRL).
- For several samples, multiple residues were detected. For instance, 7 to 22 different pesticides were detected in samples of paprika powder.
- **45 samples contained one or more residues of non-approved pesticides.**
- All samples of paprika powder, chili and cumin contained one or more residues of non-approved pesticides.
- The most detected residues of non-approved pesticides were: Chlorfenapyr, Bifenthrin, Spirotetramat, the three neonicotinoids Clothianidin, Thiamethoxam, Imidacloprid and the rice fungicide Isoprothiolane.
- According to official data from the European Chemicals Agency (ECHA), six of those pesticides were exported to several third countries in 2024-2025.

3 METHODOLOGY

SAMPLING PROTOCOL:

Between the 13th and the 31st of March 2026, foodwatch conducted a sampling of tea, rice, and spices in Germany, France, Austria, and the Netherlands: 64 samples were taken and analysed for 736 pesticides using multi-methods. This investigation aimed to assess whether food products available on the European market are contaminated with residues of pesticides that are not approved in the EU. The objective is to contribute to ongoing monitoring efforts and to document the continued presence - or absence - of such substances in imported foods that are not produced within the EU. By generating this evidence, foodwatch aims to inform decision-makers and highlight the persistence of this issue in the European food supply.

Samples were collected following a standardised and documented protocol to ensure traceability, reproducibility, and legal robustness of the results.

• Scope of sampling

Products were selected by foodwatch offices across four countries: the Netherlands, Austria, Germany, and France. Three product categories were targeted: rice, tea, and spices.

• Why these particular categories?

These categories were chosen based on an analysis of the latest EFSA monitoring data on pesticides residues, which indicate that these food products are amongst the most contaminated by residues of non-approved pesticides[iii].

The selected categories also correspond to products that are largely not cultivated within the EU and are primarily available to consumers through imports, making them especially relevant for assessing exposure to residues from non-EU agricultural practices.

• Sampling design

For each country and each product category, a minimum of five distinct products were selected. For every product, two identical units were purchased at the same retail location. Both units belonged to the same batch (lot number) and were produced within closely matched timeframes.

One unit was allocated for laboratory analysis, while the second was retained as a reference sample for potential confirmatory testing or communication purposes.
This duplication ensures analytical reliability and strengthens the evidentiary value of the findings.

The overall sampling framework can be summarized as follows:
- 4 countries;
- 3 product categories;
- 5 products per category and per country minimum;
- 2 units per product (same batch/lot and closely matched production time).

• Sampling procedure

The following steps were systematically applied in each country:
- Selection of products according to predefined criteria;
- Purchase of two identical units per product (same location, same batch/lot number, closely matched production time);
- Recording and documentation of all relevant product information.

• Laboratory requirements and handling

- A minimum quantity of 100 g per product was delivered.
- Products remained unopened prior to analysis.
- All samples from each country were shipped together in a single consignment to the laboratory.
- A complete inventory of all sampled products was submitted.

• Data recording

For each sampled product, the following information was systematically recorded:
- Product name and brand
- Package size
- Batch/lot number
- Expiry date
- Retailer name and address
- Date and time of purchase
- Photographic record of the product

• Product selection criteria

Products were selected to reflect market diversity within each category. The selection included both well-known brands and retailer (private label) products, as well as a range of quality and price segments according to the country context and relevance.

LABORATORY TESTING METHODOLOGY:

The products were tested for pesticide residues by an accredited laboratory using advanced multi-methods known as:
- liquid chromatography - tandem mass spectrometry (LC-MS/MS);
- and gas chromatography - tandem mass spectrometry (GC-MS/MS).

These internationally validated techniques are widely used in routine food safety testing and allow laboratories to detect very small traces of a broad range of pesticide substances with high accuracy.

The two methods were used in complementarity to each other because pesticides substances tested have different chemical properties:
- LC-MS/MS is better suited for more polar, non-volatile compounds.
- GC-MS/MS is used for more volatile and thermally stable substances.

Using both approaches ensures a much wider range of pesticides can be reliably screened. In this analysis, **a comprehensive panel of approximately 736 pesticides was included.**

It is important to note that certain highly polar substances, such as dithiocarbamates[iv], ethylene oxide, glyphosate and glufosinate, require separate, specialized testing methods. Therefore, they were not included in this screening.

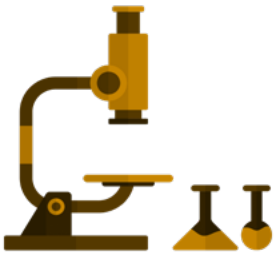
ANALYSIS OF THE TEST RESULTS

The results from the laboratory were imported into a relational database and matched with other databases containing data with:

- **Maximum Residue Levels** for each substance/pesticide tested (EU Regulation 396/2005).
- **Authorisation status of the detected pesticide substances** (EU Regulation 540/2011 implementing Regulation (EC) No 1107/2009 of the European Parliament and of the Council as regards the list of approved active substances). The authorisation status of a pesticide refers to whether an active substance is approved for use in a pesticide product within the EU. Only substances that are approved may be used by farmers. This framework is directly linked to food production within the EU and underpins the setting of maximum residue levels (MRLs) to protect consumer health.
- **Use limitation** of the detected pesticides (EU Regulation 649/2012 on the import and export of hazardous chemicals in the EU, implementing the Rotterdam Convention). The term "use limitation" refers to the implementation of the Prior Informed Consent (PIC) procedure of the Rotterdam Convention: PIC requires that importing countries are informed about and consent to receiving certain hazardous substances already restricted in the EU. The PIC regulation provides a list of chemicals that are hazardous and subject to international trade controls. As a result, a pesticide may be banned for use within the EU but still be produced and exported to third countries and potentially re-enter the EU through imported food products.
- All ECHA export notifications of those pesticides for the period 2024-2025.
- Pesticide residue analysis is performed using validated analytical methods that include an associated measurement uncertainty (MU), reflecting the margin of error inherent to laboratory testing. This uncertainty could be applied to interpret results conservatively (by lowering reported values) or precautionarily (by considering higher potential levels). However, in this report, results are presented as measured, without adjustment for MU, ensuring a transparent and unbiased representation of the analytical findings.

Other:

- For the assessment of MRL compliance in paprika powder and chili, a processing factor of five was applied to account for weight reduction during the drying process[v].
- Regarding Anthraquinone, it is important to acknowledge the possibility of contamination through several routes of exposure, including atmospheric deposition[vi]. Still, the substance is not approved for use as a pesticide active substance in the EU, and since it is covered by Regulation (EU) 396/2005, MRL compliance was assessed accordingly.
- The product categories used in this study follow the food classification applied in the context of pesticide residue analysis, in line with the Codex Alimentarius and the EU framework for Maximum Residue Levels (Regulation (EC) No 396/2005).



4 RESULTS

Among 64 samples tested, 49 samples contained pesticides residues.
We detected 54 different pesticides, for a total of 293 detections.

RESULTS FOR ALL PRODUCTS TESTED

Product tested	Product category	Retailer	Nber of pesticides detected	Nber of pesticides above MRL	Nber of non EU-approved pesticides detected
AUSTRIA					
Bon-Ri Basmati Reis	Rice	Hofer			
Clever Langkornreis	Rice	Billa/Billa Plus			
Golden Sun Parboiled Spitzenreis im Kochbeutel	Rice	Lidl	2	1	1
Reis-fit Spitzen-Langkorn	Rice	Billa Plus	2		1
SPAR Basmati Langkorn-Reis	Rice	Spar			
BILLA Immer Gut Curry mild	Spice	Billa/Billa Plus	3	1	1
Just Spices Curry Madras	Spice	Billa/Billa Plus	1		
Kotanyi Paprika Edelsüß Spezial	Spice	Spar/Billa	17		7
Le Gusto Edelsüß Paprika gemahlen	Spice	Hofer	16		5
S-Budget Paprika Edelsüß	Spice	Spar	22		6
Lord Nelson Schwarzer Tee Earl Grey	Tea	Lidl	1	1	1
Sir Winston Tea Earl Gray	Tea	Spar/Billa	1		
SPAR Grüner Tee	Tea	Spar	4		3
Twinings Pure Green Tea	Tea	Spar/Billa	4	1	3
Westminster Grüner Tee	Tea	Hofer	2		2
GERMANY					
Ben's Original	Rice	Penny			
Dr. Oetker Milchreis nach klassischer Art	Rice	Lidl			
Herzensstücke Langkorn Spitzenreis	Rice	Edeka	1		1
Ja Basmati Reis	Rice	Rewe	3		2
Oryza Ideal Reis	Rice	Edeka			
FUCHS Kreuzkümmel	Spice	Edeka	6	1	4
Ja! Paprika edelsüss gemahlen	Spice	Rewe	8		5
Kania Kreuzkümmel	Spice	Lidl	2	1	2
Kania Paprika Edelsuess	Spice	Lidl	8		5
Le Gust Edelsuess Paprika	Spice	Aldi	12		4
Ostman Paprika rosenscharf	Spice	Edeka	13		3
Ostmann Chilli Flocken	Spice	Edeka	8		3
Ostmann Kreuzümmel	Spice	Rewe	3		2
REWE Chili mix	Spice	Rewe	22	1	7
Kindertee Magen & Darm Beruhigungs Tee (12 Beutel), 18 g. Mivolis	Tea	DM			
Lord Nelson schwarzer Tee Mischung	Tea	Lidl			
Rewe; Teekanne Feinster Grüner Tee	Tea	Rewe	2		2
Rossmann; Meßmer Grüner Tee	Tea	Rossmann	2		2
Westminister Tea Schwarztee - Mischung	Tea	Aldi			

Product tested	Product category	Retailer	Nber of pesticides detected	Nber of pesticides above MRL	Nber of non EU-approved pesticides detected
FRANCE					
Riz basmati Leader price	Rice	Franprix	3		1
Riz Basmati Long Carrefour extra	Rice	Carrefour	3		2
Riz Le Thai Taureau Ailé	Rice	Franprix	1	1	1
Riz long grain Monoprix	Rice	Monoprix			
Vermicelles de riz Suzi Wan	Rice	Monoprix			
Cumin entier Albert Menes	Spice	Monoprix	3		2
Cumin moulu Ducros	Spice	G20	1		1
Curry vert thai Albert Menes	Spice	Monoprix	5		
Paprika doux Bouton d'or	Spice	Intermarché	14		5
Paprika doux moulu Ducros	Spice	Carrefour	18	2	6
Gunpowder Thé vert nature Twinings	Tea	Carrefour	4		3
Thé vert à la menthe Lipton	Tea	Franprix	1		1
Thé vert de Chine à la menthe Leader price	Tea	Franprix	2		2
Thé vert menthe Carrefour Sensation	Tea	Carrefour	3		3
Thé vert Monoprix	Tea	Monoprix	2		2
NETHERLANDS					
Albert Heijn Basmati Rijst	Rice	Albert Heijn	2		2
Alesie heerlijk geurende rist basmati	Rice	Dirk			
Ben's original rice	Rice	Jumbo			
Lassie basmati rijst	Rice	Albert Heijn			
Tilda Pure Basmati	Rice	Albert Heijn	2		1
Chili, La Drogheria	Spice	Albert Heijn	15	1	3
Euroma Paprika	Spice	Jumbo	7	1	2
Komijnzaad, Verstegen	Spice	Albert Heijn	4	1	2
Paprika poeder Mild, Verstegen	Spice	Albert Heijn	18	1	9
Piment fume; La Chinata	Spice	Albert Heijn	12	3	3
Green tea ginger, Twinings London 1706	Tea	Jumbo	1		1
Groene Thee, Albert Heijn	Tea	Albert Heijn	3		2
Lipton Citrus Green Tea	Tea	Jumbo	2		
Pickwick Green tea ginger	Tea	Albert Heijn	2		2
Yogi Tea Biologisch Green Energy	Tea	Jumbo			

Notes :
49 products out of 64 contained pesticides residues
14 products out of 64 contained residues above MRL
45 out of 64 samples were tested with non EU-approved pesticides

The list of pesticides detected can be found in the table below, which shows several indicators including:
- the legal status of the pesticide in the EU (approved or not)
- the number of exporting/importing countries

PESTICIDES SUBSTANCES DETECTED IN THE PRODUCTS TESTED

Pesticide substance	EU Status under Reg. EU 1107/2009	Use limitation (Reg. EU 649/2012)	Nber of importing third countries	Nber of exporting EU Member State
2,4-D	Approved			
2-Phenylphenol	Approved			
Acetamiprid	Approved			
Ametoctradin	Approved			
Anthraquinone	Not approved	b-b	4	2
Azoxystrobin	Approved			
Bifenthrin	Not approved	b-sr	6	7
Biphenyl	Not approved			
Boscalid	Approved			
Carbendazim	Not approved	b	77	8
Carboxin	Not approved	b	1	1
Chlorantraniliprol	Approved			
Chlorfenapyr	Not approved	b	15	6
Clothianidin	Not approved	b	35	8
Cyantraniliprol	Approved			
Deltamethrin	Approved			
Difenoconazol	Approved			
Dimethomorph	Not approved	b	49	3
Dinotefuran	Never approved			
Fenpyrazamin	Not approved			
Fenpyroximat	Approved			
Flamprop	Not approved			
Flonicamid	Approved			
Fludioxonil	Approved			
Flufenoxuron	Not approved	b-sr	3	2
Fluopyram	Approved			
Flupyradifuron	Approved			
Fluxapyroxad	Approved			
Fuberidazol	Not approved	b		
Hexythiazox	Approved			
Imidacloprid	Not approved	sr	80	11
Indoxacarb	Not approved	b	32	4
Isoprothiolan	Not approved			
Isopyrazam	Not approved	b	3	1
Lambda Cyhalothrin or gamma-Cyhalothrin	Approved			
Linuron	Not approved	b		
Lufenuron	Not approved	b	38	
MCPA and MCPB	Approved			
Metalaxyl	Approved			

Pesticide substance	EU Status under Reg. EU 1107/2009	Use limitation (Reg. EU 649/2012)	Nber of importing third countries	Nber of exporting EU Member State
Methoxyfenozide	Approved			
Metrafenone	Approved			
Myclobutanil	Not approved	b	11	3
Picoxystrobin	Not approved	b	16	5
Profenophos	Not approved			
Propamocarb	Approved			
Pydiflumetofen	Not approved			
Pyraclostrobin	Approved			
Pyriproxyfen	Approved			
Spiromesifen	Not approved			
Spirotetramat	Not approved	b	34	5
Tebuconazol	Approved			
Thiacloprid	Not approved	b-b	26	4
Thiamethoxam	Not approved	b	70	7
Trifloxystrobin	Approved			

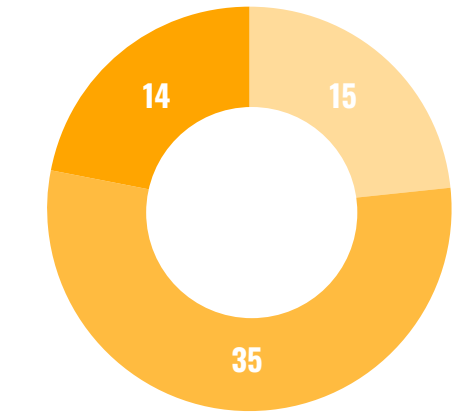
Legend:
b = Ban, the substance is prohibited for agriculture
b-b = Ban in all uses, the substance is prohibited in both pesticide and non-pesticide uses (total ban)
sr = Severely restricted
b–sr = Ban / Severely restricted, the substance is banned in one use category and severely restricted in the other
***Note:** Spirotetramat approval expired on 30th April 2024, with a long grace period. It is impossible for us to know if the products including in the testing were put on the market before the end of the grace period.

PRODUCTS WITH PESTICIDES ABOVE THE MAXIMUM RESIDUE LEVEL (MRL)

Among the 64 samples, one was a certified organic sample and one a medicinal tea for infants and children: in both samples, no pesticides were detected.

Among the 62 samples from conventional agriculture:
- **49 samples contained pesticides** (detection above the limit of quantification, or LOQ)
- **14 samples contained residues above the legally allowed limit** (MRL, Maximum Residue Level).

TESTS RESULTS FOR THE 64 SAMPLES



* LOQ = Limit of quantification / ** MRL = Maximum residue level

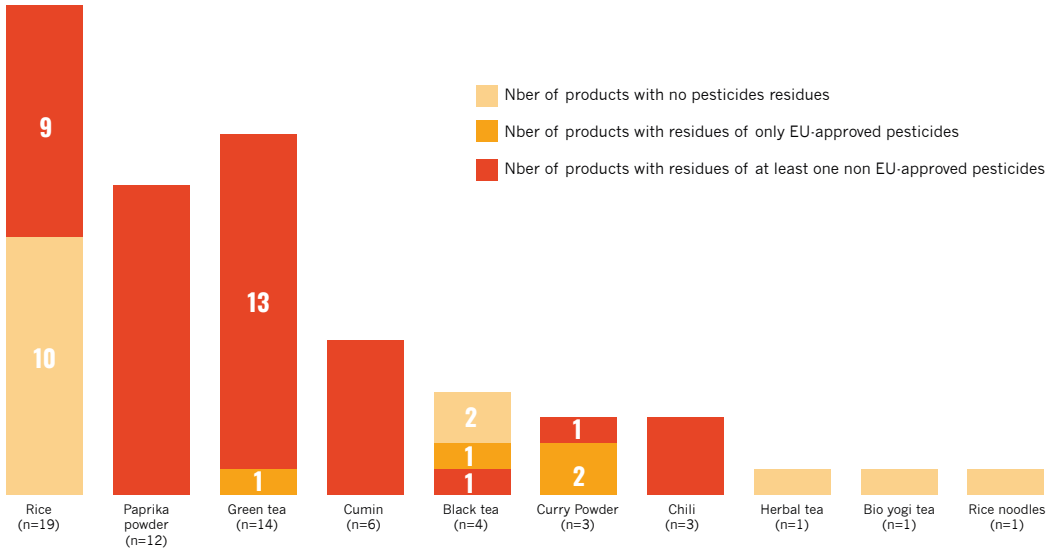
SAMPLES OVER MAXIMUM LEVEL OF RESIDUES

Product tested	MRL Regulation Product category	Retailer	Country of purchase	Pesticide detected	Result (mg/kg)	MRL (mg/kg)
Paprika poeder Mild, Verstegen	Peppers, dried	Albert Heijn	NL	Chlorfenapyr	0,103	0,01
Piment fume; La Chinata	Peppers, dried	Albert Heijn	NL	Anthraquinone	1,59	0,01
				Biphenyl	0,56	0,01
				2-Phenylphenol (H)	0,352	0,01
Euroma Paprika	Peppers, dried	Jumbo	NL	Anthraquinone	0,081	0,01
Chili, La Drogheria	Peppers, dried	Albert Heijn	NL	Flonicamid (sum)	1,55	0,3
Kominzaad	Cumin	Albert Heijn	NL	Flamprop*	3,87	0,01
Paprika doux moulu Ducros	Peppers, dried	Carrefour	FR	Chlorfenapyr	0,096	0,01
				Flonicamid (sum)	1,89	0,3
Riz Le Thai Taureau Ailé	Rice grain	Carrefour	FR	Anthraquinone	0,027	0,01
Kania Kreuzkümmel	Cumin	Lidl	DE	Flamprop*	2,17	0,01
FUCHS Kreuzkümmel	Cumin	Edeka	DE	Flamprop*	1,65	0,01
REWE Chili mix	Peppers, dried	Rewe	DE	Chlorfenapyr	0,061	0,01
Lord Nelson Schwarzer Tee Earl Grey	Tea leaves and stalks, fermented (mostly black tea)	Lidl	AT	Anthraquinone	0,039	0,02
Twinings Pure Green Tea	Non-fermented tea leaves (green or white tea)	Spar/Billa	AT	Anthraquinone	0,093	0,02
Billa Immer Gut Curry mild	Mix of spices	Billa	AT	Thiacloprid**	0,055	0,05
Golden Sun Parboiled Spitzenreis im Kochbeutel	Rice grain	Lidl	AT	Acetamiprid	0,038	0,01

* For Flamprop no MRLs are set, the default MRL of 0.01 mg/kg has been applied
** For thiacloprid the MRL is 0.05 mg/kg for all spices (product group "spices" : 0800000 - Reg 398/2005)
In orange are the MRL who are higher than the limit of detection (LOQ) - ie there is a higher tolerance for the presence of these pesticides
In red are the pesticides that are NOT approved in the EU
Notes :
A processing factor (PR=5) has been applied to all sweet peppers/bell peppers products

PRODUCTS WITH NON-APPROVED PESTICIDES

Altogether, **45 samples contained one or more residues of non-approved pesticides.** More specifically, all samples of paprika powder, chili and cumin contained one or more residues of non-approved pesticides. The next figure summarizes the results – the sample number is indicated in the brackets. Results show that 9 out of 19 rice samples, all 6 cumin samples, and 1 out of 3 curry samples contained non-approved pesticides.



MOST CONTAMINATED PRODUCTS

Most samples tested positive contained multiple residues. **The number of pesticides was especially high in paprika powder with 7 to 22 different pesticides (whether approved or non-approved) per sample.**

FOCUS ON PAPRIKA

Paprika products tested	Retailer	Nber of pesticides detected	Nber of pesticides above MRL	Nber of non-EU approved pesticides detected
Kotanyi Paprika Edelsüß Spezial	Spar/Billa	17	0	7
S-Budget Paprika Edelsüß	Spar	22	0	6
Le Gusto Edelsüß Paprika	Hofer	16	0	5
Paprika doux Bouton d'or	Intermarché	14	0	5
Paprika doux moulu Ducros	Carrefour	18	2	6
Euroma Paprika	Jumbo	7	1	2
Piment fumé La Chinata	Albert Heijn	12	3	3
Paprika poeder Mild, Verstegen	Albert Heijn	18	1	9
Kania Paprika Edelsuess	Lidl	8	0	5
Le Gust Edelsuess Paprika	Aldi	12	0	4
Ostaman Paprika rosenscharf	Edeka	13	0	3
Ja! Paprika edelsüss gemahlen	Rewe	8	0	5

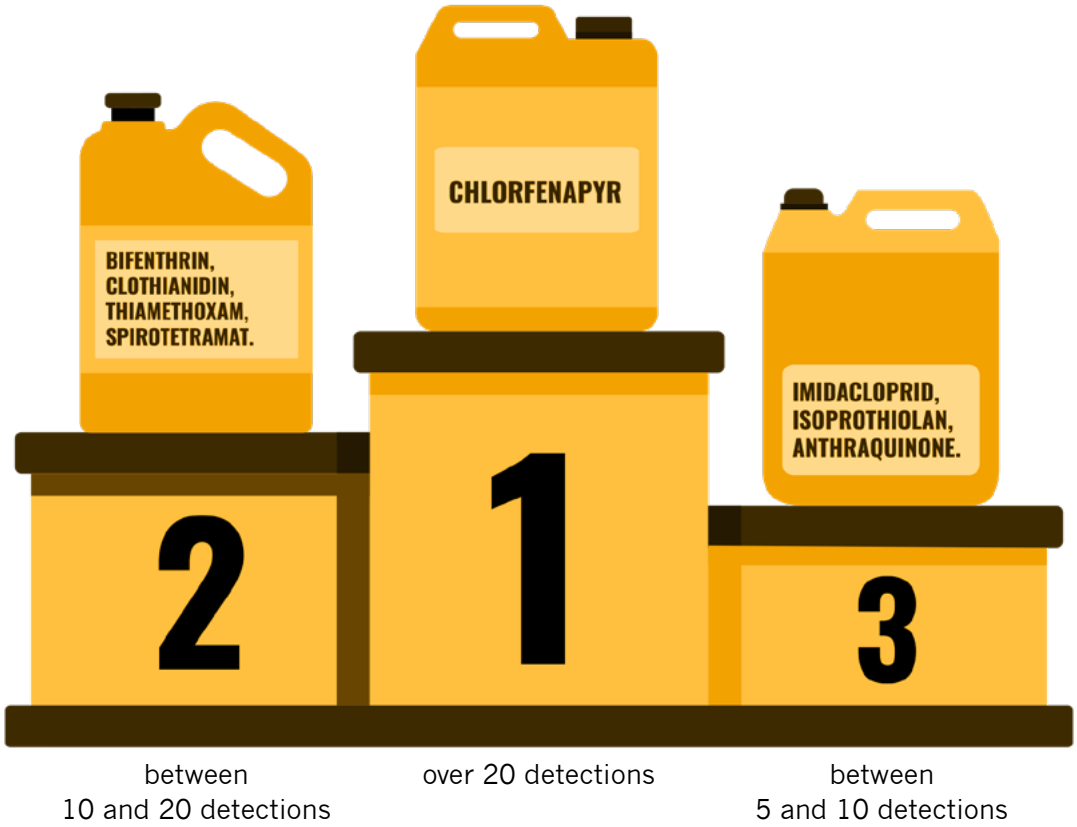
TEST RESULTS FOR ALL PRODUCTS, PER CATEGORY

Product category	Nber of products	Nber of products tested positiv	Nber of products with pesticides above MRL	Nber of products with non-EU approved pesticides
Cumin	6	6	3	6
Curry powder	3	3	1	1
Herbal and other non-tea infusions	1	0	0	0
Herbal infusions specific for infants and young children, dry	1	0	0	0
Non-fermented tea leaves (green or white tea)	14	14	1	13
Noodle, rice	1	0	0	0
Paprika powder	12	12	4	12
Peppers, dried (other than paprika powder)	3	3	2	3
Rice grain	19	9	2	9
Tea leaves and stalks, fermented (mostly black tea)	4	2	1	1

MOST FREQUENTLY DETECTED NON-APPROVED SUBSTANCES

Residues of non-approved pesticides (see definition in Annex) most frequently detected were: Chlorfenapyr, Bifenthrin, Spirotetramat, the three neonicotinoids Clothianidin, Thiamethoxam, Imidacloprid, and the rice fungicide Isoprothiolane.

MOST DETECTED NON APPROVED PESTICIDES



Six of the non-approved pesticides most frequently detected are covered by Regulation (EU) No 649/2012 concerning the export and import of hazardous chemicals in the EU.

And the analysis of the ECHA export notifications[vii] shows indeed that those six substances were exported from the EU to several third countries during the period 2024-2025.

LIST OF DETECTED NON-APPROVED OR SEVERELY RESTRICTED PESTICIDES UNDERLYING EU REGULATION 649/2012

Pesticide substance	
Anthraquinone	Indoxacarb
Bifenthrin	Isoprothiolan
Biphenyl	Isopyrazam
Carbendazim	Linuron
Carboxin	Lufenuron
Chlorfenapyr	Myclobutanil
Clothianidin	Picoxystrobin
Dimethomorph	Profenophos
Dinotefuran	Pydiflumetofen
Fenpyrazamin	Spiromesifen
Flamprop	Spirotetramat
Flufenoxuron	Thiacloprid
Fuberidazol	Thiamethoxam
Imidacloprid	

5 CONCLUSIONS & RECOMMENDATIONS

This investigation confirms that residues of pesticides which are not approved in the EU frequently make their way into everyday food products that are on European supermarket shelves. These findings demonstrate that the current legal framework on pesticides has important loopholes and do not protect consumers from exposure to residues of such non approved substances, raising concerns for health protection.

IN LIGHT OF THESE RESULTS, FOODWATCH CALLS ON THE EUROPEAN COMMISSION TO:

1. **Introduce a comprehensive ban on the trade of pesticides that are not approved for use within the EU.** The double standard currently in place leaves farmers, communities, and consumers in third countries exposed to substances known for their health and environmental harms and is morally unacceptable.

2. **Automatically lower all maximum residue levels (MRLs) of non-approved pesticides to the limit of detection** to prevent these substances from making their way back onto European plates via a dangerous 'boomerang effect'.

At the time of writing this report, unfortunately, the European Commission's course of action does not show any positive sign.

On the one hand, the 2020 Chemical Strategy for Sustainability's commitment to **stop the trade of chemicals no longer approved in the EU remains an empty promise.**

On the other hand, the recent **Commission proposal to address residues of banned pesticides as part of the Omnibus package on food and feed safety presented in December 2025 is far from acceptable to truly protect consumers.** Not only would the proposal allow action only on a minority of substances, but it would also introduce individual impact assessments for each substance before residue levels can be modified. This proposition does not guarantee an automatic lowering to the limit of detection for all banned pesticides and could mean that action would take years,exposing European consumers to harmful residues.

Finally, this proposal for action on residues appears like a drop in the ocean when analysed in the overall context of the pesticides-related proposals of the omnibus. **Since the Commission intends to relax the rules on the approval of pesticides** (making unlimited approvals the rule and periodic reviews the exception, relaxing the requirement to use the latest scientific evidence in assessments) and on maximum residue limits (removing the periodic reviews, allowing the use of outdated maximum residue limits for food products for a longer period), **the ban of pesticides harmful for health and the environment will be made more difficult and citizens will remain exposed to their residues for longer periods.**

For these reasons, foodwatch calls on the European Parliament and Member States to reject the regulatory proposal for an omnibus on food safety on the table and to demand from the European Commission urgent action to truly protection consumers and the environment from all harmful pesticides.

FOODWATCH ALSO CALLS ON FOOD PRODUCERS AND RETAILERS TO TAKE THEIR RESPONSIBILITIES TO ADDRESS THE PROBLEM:

1. By ensuring the absence of pesticides residues above legally allowed limits in the products that are sold on the shelves. The General Food Law (EU Regulation 178/2002) places the responsibility for food safety and traceability along the food chain on food operators.

2. By putting pressure on their suppliers to provide them with detailed information about their food products and proof of ingredients' safety.

FINALLY, FOODWATCH CALLS ON NATIONAL AUTHORITIES TO TAKE MEANINGFUL MEASURES TO ENSURE THAT THE EU'S LEGAL OBLIGATIONS FOR FOOD SAFETY AND TRACEABILITY ARE FULLY ENFORCED:

1. By stepping up controls on food products and dedicating enough resources to them;

2. By stepping up their actions against companies that are not complying with the law, for instance through financial penalties that are high enough to deter them from circumventing their obligations.

6 ANNEXES & REFERENCES

BANNED, EXPIRED, NON-APPROVED PESTICIDES – WHAT IS THE DIFFERENCE?

Pesticides may only be sold and used in an EU Member State if the active substance that they contain has been previously **approved at the EU level** under EU Regulation 1107/2009.

Approvals for the pesticide active substances under EU Regulation 1107/2009 are limited in time:
- In general, active substances receive an initial approval for ten years.
- "Basic substances" are approved without a time limit.
- "Low risk" substances are approved for up to 15 years.
- "Candidates for substitution" are approved for seven years.

At the latest three years before an approval expires, manufacturers must apply for a renewal:
- For candidates for substitution, for another 7 years,
- For other active substances, for another 15 years.

If no application is submitted, then the approval automatically expires.

When an application for renewal is submitted, Member States experts together with EFSA reassess the substances. This review considers, among other things, experience from previous use as well as new scientific findings and technical developments. It is then up to the European Commission to make a proposal for regulation action to either reapprove or reject the renewal. Member States eventually vote on this proposal.

Once a pesticide active substance is approved for sale and use on the European market, maximum limits for its residues in various crops are established under EU Regulation 396/2005 (maximum residue limits or MRLs). Those limits are reviewed periodically according to the evolution of the regulatory status of the pesticide active substances and of scientific evidence about their effects. In cases when a pesticide active substance is not reapproved, the MRLs are reviewed. Currently, the European Commission does not automatically lower those MRLs to the technical zero (limit of quantification or LOQ) once an active substance is banned. It casually establishes higher limits based on trade considerations through import tolerances or the adoption of values used internationally (e.g. in the context of Codex). This explains why residues of pesticides currently not approved on the EU market can still make their way onto our plates.

In the context of EU Regulation 649/2012, which governs the import and export of hazardous substances in the EU, a pesticide can be classified as **"banned"** if its use has already been prohibited in the European Union to protect human health or the environment.

This applies in two main situations:
- when a pesticide's approval has expired or its renewal has been denied, and
- when a chemical has either been refused approval from the start or withdrawn by the manufacturer during the approval process, **and there is evidence that it may harm people or the environment.**

The regulation includes an annex listing around 250 pesticides with "banned" uses. In many cases - such as Spirotetramat, Carbendazim, and Glufosinate - companies did not apply for renewal. However, concerns about risks to human health or the environment were sufficient to justify banning their use.

NOTES

i • Joint civil society statement, https://www.foodwatch.org/fileadmin/-INT/pesticides/Banned_pesticides_ENG_FINAL.pdf June 2025
ii • European Commission, Chemicals Strategy for Sustainability, https://environment.ec.europa.eu/strategy/chemicals-strategy_en, 2020
iii • EFSA (European Food Safety Authority), Carrasco Cabrera, L., Di Piazza, G., Dujardin, B., Marchese, E., & Medina Pastor, P. (2025). The 2023 European Union report on pesticide residues in food. EFSA Journal, 23(5), e9398. https://efsa.onlinelibrary.wiley.com/doi/10.2903/j.efsa.2025.9398
iv • A residue of either Mancozeb, Metiram, Maneb, Propineb, Thiram or Ziram. Only Ziram is still approved in the EU.
v • MRLs are valid for fresh products (sweet peppers and chili pepper).
vi • Valduga, A.T., Gonçalves, I.L., Saorin Puton, B.M. et al (2024): Anthraquinone as emerging contaminant: technological, toxicological, regulatory and analytical aspects. Toxicol Res.40, 11–21 (2024). https://doi.org/10.1007/s43188-023-00202-3; Li CWY, Walters S, Müller JF, Orlando J, Brasseur GP (2023): Contamination of tea leaves by anthraquinone: The atmosphere as a possible source. Ambio. 52(8):1373-1388. doi: 10.1007/s13280-023-01858-9.
vii • Data for all detected „banned“ pesticides were downloaded from the ECHA database on 03.04.2026.

GERMANY

Rice

Spices

Teas

AUSTRIA

Rice

Spices

Teas

FRANCE

Rice

Spices

Teas

NETHERLANDS

Rice

Spices

Teas