

From Vision to Implementation: Pesticide Standards and International Trade

Florence School of Regulation - EUI

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Setting the context

The EU MRL framework plays a dual role:

- **MRLs function as trading standards** that provide predictability for farmers, food business operators and international partners, thereby supporting resilient and affordable food supply chains.
 - At the same time, they ensure **dietary safety of expected residues** on food and feed, assessed via robust scientific risk assessment.
- Any changes to this framework therefore warrant careful consideration.

Some background information:

- **The EU Green Deal** – impacts were noted on farmers/exporters from the AME region exporting to the EU.
- **Vision on the Future of Food & Agriculture** – and most recently **EU Omnibus on Food and Feed Safety**. Some positive developments - around chemicals and biopesticides, willingness of the EU to assess impacts of its legislation and consult with third countries.
- However, **concerns around MRLs**, as the proposal **incorporates the reciprocity clause directly into the process of setting MRLs**.

CL AME has commissioned independent scientific studies assessing the impact of the EUGD on Moroccan (tomatoes, citrus, red fruits, sugar beets and others) and South African agriculture (maize, citrus, pome fruits and grapes)

Country	Crops Studied	Impacts of EU Green Deal (EUGD)
Morocco	Tomatoes, Citrus, Red Fruits, Sugar Beets, Zucchini, Watermelon	<ul style="list-style-type: none"> • Increased risks of pest resistance • Pressure on crop yields and quality • Reduced export competitiveness • Transition challenges for farmers, especially smallholders, due to fewer crop protection tools
South Africa	Maize, Citrus, Pome Fruits, Grapes	<ul style="list-style-type: none"> ➤ For table grapes, BFAP study shows marketable volumes decline, reducing exports to the EU by 13%

MRLs and mirror clauses – Concerns

To note: Over the past 6 years, no new conventional active substances have been approved, while the available toolbox has been reduced by more than 80 substances, including biopesticides

For certain substances not authorized in the EU, the Commission intends to set MRLs at the limit of quantification (zero):

- Such a case-by-case approach to MRL setting is concerning and would likely generate further **unpredictability and risk of trade barriers for industry and the EU trading partners**
- and would shift the EU toward a **hazard-based default for imports and away from the risk -based approach** underpinning international standards and WTO principles.

➤ **This will directly impact the ability of global farmers to access the European market, creating risks and regulatory uncertainty for exporters and importers.**

Spillover effects and setting precedents – EU national actions

- Recent national actions by France illustrate the political and regulatory context in which the EU Food & Feed Safety Omnibus Package is being advanced. Indeed, in early January, **France adopted a Decree introducing a de facto “zero tolerance” MRL policy for residues of five active substances.** Citrus fruits, mango and papaya will particularly be impacted by the French decree
- Concern that **the Omnibus Package’s objectives** - simplification, coherence and a “level playing field” on pesticide residues - **are increasingly intersecting with trade, import controls and political debates on fairness and competitiveness within the EU agri-food sector.**



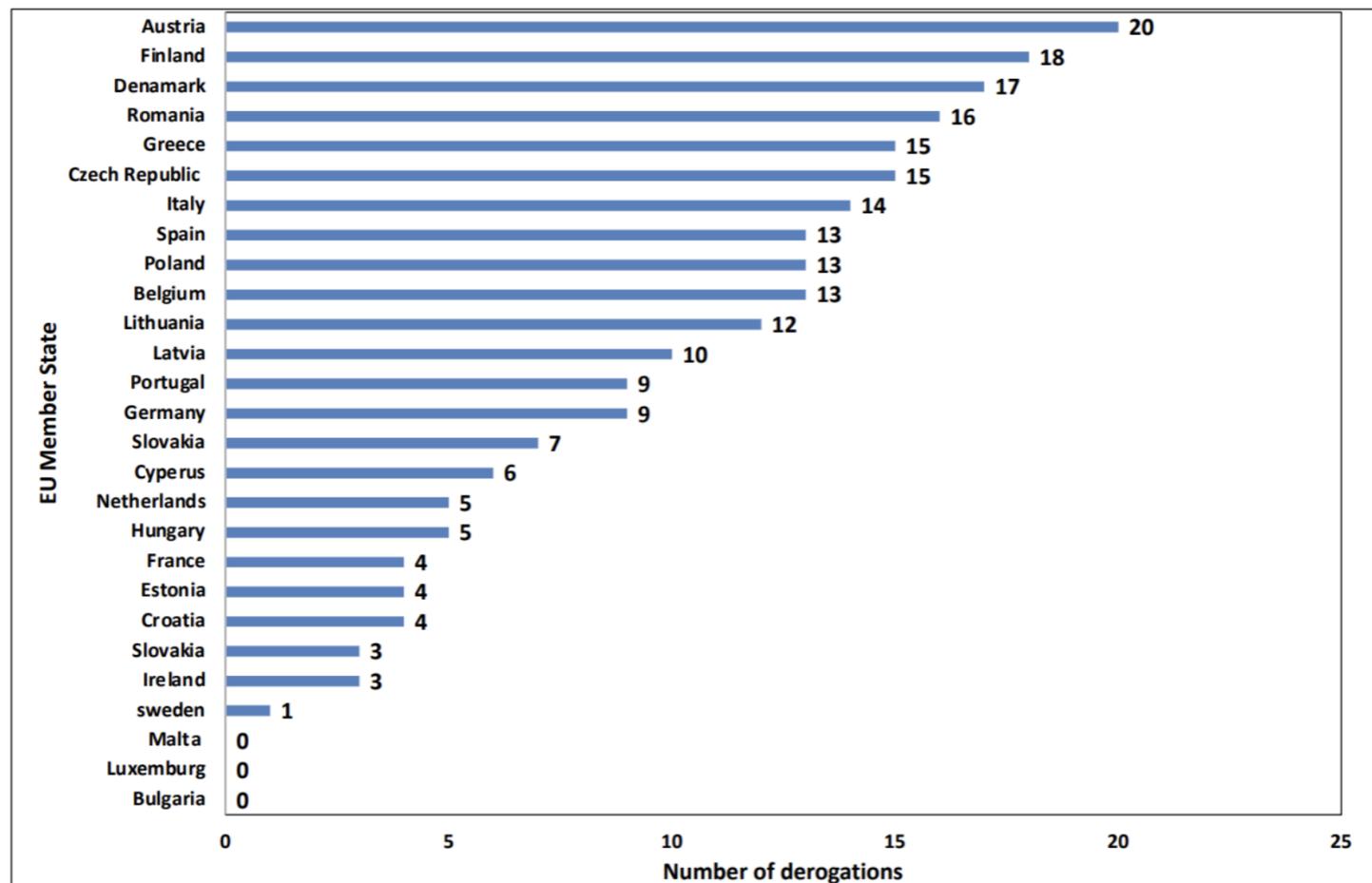
Impacts

- Concern is not with the objective of high consumer protection, but with how it is pursued: **unilateral approaches risk bypassing the EU's harmonised framework and fragmenting the single market.**
- Unilaterally deviating from established WTO obligations **disregards international law**
- This proposal raises multiple systematic concerns, including:
 - ✓ It allows existing **import tolerances to be revoked solely on the basis of hazard classification**
 - ✓ This **undermines predictability for farmers, exporters and competent authorities in third countries.**
 - ✓ Such an approach applies a **one-size-fits-all model that fails to take local contexts** - including geography and climate - into account. **Crops grown in the AME region require specific tools that are not necessarily needed in the EU, as pest and disease pressures differ significantly.**
 - ✓ **This approach negatively affects the competitiveness of the African exporters.** While all countries strive toward sustainable and resilient agriculture, progress must occur at an appropriate pace, respecting local conditions and existing risk-assessment frameworks.

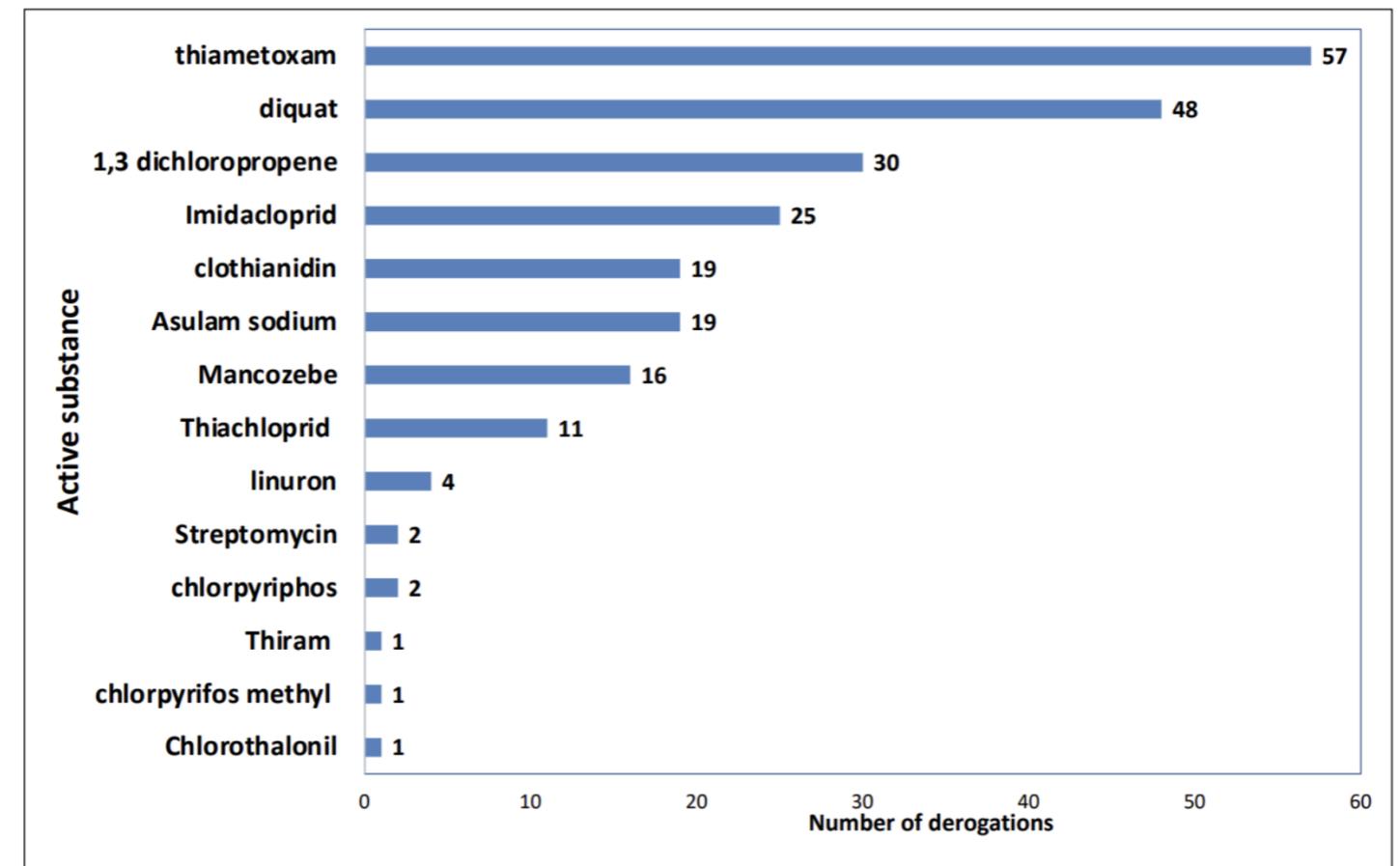
EU derogations systems

- For certain substances not authorized in the EU, the Commission intends to set MRLs at the limit of quantification (zero)
- At the same time, **EU derogation system - which allows the re-authorization via an emergency procedure of an active substance withdrawn from the market** for a period of 120 days when phytosanitary needs – exist
- Concerns that **unequal competitive conditions could worsen, as such system does not exist for third countries**

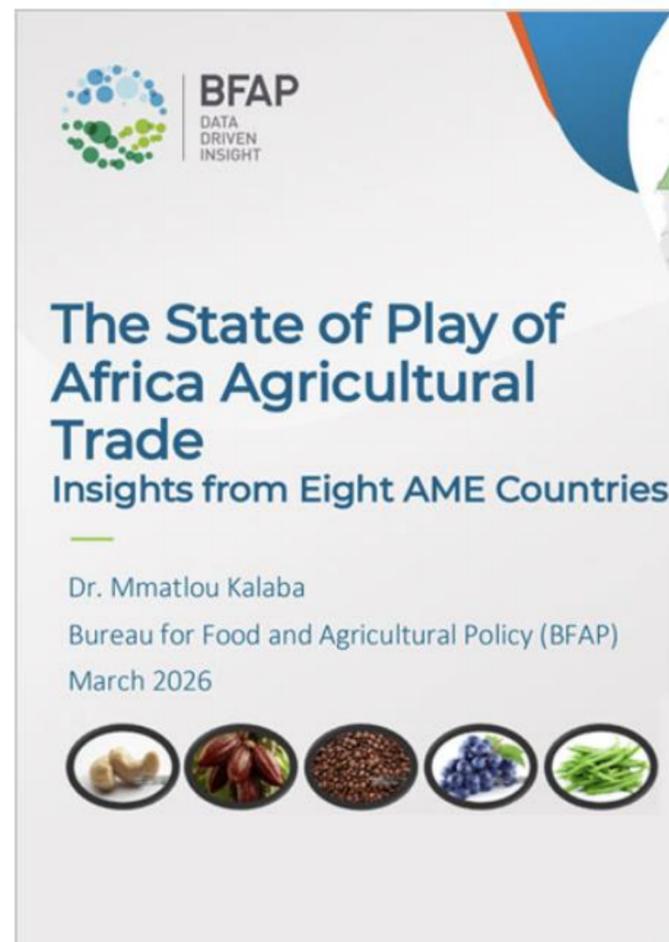
Number of derogations granted to certain banned pesticides by EU Member States (2019 - 2022).



Number of derogations granted by EU Member States per active substance (2019 - 2022).



Links to studies commissioned by CropLife AME



State Of Play Of Trade Of
AME Agricultural
Commodities



<https://croplifeafrica.org/wp-content/uploads/2026/03/state-of-play-trade-ame-agricultural-commodities.pdf>



Impact Of EU Green Deal
On South African
Agriculture



<https://croplifeafrica.org/wp-content/uploads/2026/03/bfap-croplife-impact-of-eu-green-deal-report-policy-brief.pdf>



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CropLife Africa Middle East Position Paper on Maximum Residue Levels (MRLs)

CropLife AME (CL AME) calls on the EU to base its MRLs setting system on evidence and science, which...

++ DETAILS

<https://croplifeafrica.org/croplife-africa-middle-east-position-paper-on-maximum-residue-levels-mrls/>



Thank you