

The Toxic Route

How banned pesticides find their way back on our plates

Executive Summary of the Dutch report “De grote gifroute in beeld” - December 2024.



Background

The report highlights a critical contradiction in Europe's food safety system. Despite stringent EU regulations banning harmful pesticides, traces of these banned substances are still found in food sold within European supermarkets. This paradox is further exacerbated by the EU's ongoing production and export of these pesticides to countries with less stringent regulations, leading to a cycle whereby the banned substances return to European plates via imported products.

Key Findings

The study, led by foodwatch Netherlands and based on the 2023 monitoring data from the Dutch Food and Consumer Product Safety Authority (NVWA), provides a comprehensive analysis of the residues of banned pesticides that are found in food sold in Dutch supermarkets. It also evaluates the effectiveness of current enforcement policies and supermarket self-regulation.

The analysis first looked at the NVWA's entire 2023 residue database. This includes both all risk-based measurements, such as known high-risk imports at customs, and representative measurements at supermarkets. The complete list of residues found was compared with the "not allowed" pesticides in the Active substances database of the European Commission. After further analysis (please consult the original report for the full methodology), foodwatch finds that 87 different types of residues of banned pesticides were found in food in the Netherlands in 2023.

1. Prevalence of banned pesticides in food sold in supermarkets:

- NVWA's data revealed that in 2023, 8% of the products sold in Dutch supermarkets contained residues from 25 types of banned pesticides. Half of these substances have an EU or WHO toxic classification due to health risks (category 1A or 1B carcinogenicity, mutagenicity, reproductive toxicity or endocrine disruption under the CLP regulation) or environmental risks (highly toxic to bees or birds). The rest of the pesticides have been banned because of other toxic risks to human health or to aquatic organisms, for example. One of these 25 pesticides was banned because the risk assessment could not be finalised by the European Food Safety Authority (EFSA). The agency's scientific opinion stressed the lack of data on genotoxicity and carcinogenicity, among others.
- The most contaminated products are bananas (78%), raisins (65%) and rice (30%). When looked at by country, products from the following countries contain the most banned pesticides: Colombia (71%), Turkey (43%) and Brazil (25%).

2. Regulatory gaps in import controls:

- The main reason why pesticides that are banned for use by European farmers still end up in the food sold in our supermarkets is the existence of import tolerances for them. In other words, the maximum residue limits (MRLs), the legal thresholds for pesticide residues on food, are set at higher levels than they would normally after their ban due to trading reasons.
- If all food measurements taken by the NVWA in 2023, not just those at supermarkets, are taken into account, it turns out that 87 different types of banned pesticides were found. 53 from these 87 banned pesticides were still permitted under MRLs, affecting over 269 products, including fruits, vegetables, and grains. This creates a double

standard: while EU farmers are prohibited from using these substances, they are still allowed on imported products, exposing European consumers to possible risks.

- Illustratively: in theory, apples may contain 17 different types of banned pesticides with MRLs, including very toxic ones that are suspected reproductive (6), mutagenic (2), carcinogenic (2) and endocrine (2) disruptors. A mix of different types of pesticide residues is already worrisome with regular pesticides, because the calculations of health risks do not take into account the possible accumulation of adverse effects of different residues. But with banned pesticides, therefore, it is altogether alarming, especially if they have been banned because of excessive health risks.

Enforcement failures:

- The NVWA can only act on violations exceeding MRLs with a 50% measurement uncertainty buffer, also in case of residues from banned pesticides. This leniency allows dangerous substances to bypass enforcement. In 2023, the NVWA found residues of banned pesticides on a total of 17% of the measurements (on 887 samples), but due to the enforcement requirements, in theory, NVWA was only able to take enforcement action on a maximum of 3.9% (on 199 samples). It is unknown to foodwatch if this enforcement took place.
- For just 101 samples the NVWA issued a notification in the European Rapid Alert System for Food and Feed (RASFF), in order to alert other member states that may also trade the product. These 101 reports cover all types of pesticides, not just banned ones, and include reports after measurements made by companies themselves. The 199 violations found by foodwatch are from NVWA measurements and involve only banned pesticides. This raises the question of whether the NVWA is adequately using the RASFF system.
- While some supermarkets impose stricter residue limits and blacklists, it is to be considered that it is on a voluntary basis, and none outright bans banned EU pesticides from their supply chains.

3. EU countries, including the Netherlands, continue to produce and export banned pesticides.

- Foodwatch used a new method in order to provide insight into the exports of banned pesticides from Europe and specifically the Netherlands. This method looked at European export notifications of pesticides on a dangerous list with trade restrictions: these substances may only be exported from Europe with the consent of the receiving country. The ECHA database included almost 20,000 notifications of 254 different PIC substances, according to an inventory by Foodwatch. From all the 89 banned pesticides found by the NVWA, 48 are on this so-called Prior Informed Consent (PIC) list. In 2023, these 48 banned pesticides were exported from the EU to 139 countries under a total of 5,726 export notifications.
- As of 2023, Dutch companies have made 189 notifications regarding 52 types of banned pesticides exported to China, India, Turkey, Vietnam, Pakistan and Colombia, among others. In 2023, residues of 7 of these banned pesticides were found on several common products, including cumin, tea, rice, okras and chili peppers from India, lemongrass from Thailand, oranges from Turkey and Egypt, tea from China, rice

from Pakistan and passion fruit from Colombia. This illustrates the boomerang effect of the toxic trade.

General recommendations

To address the persistent pesticide issue and break the boomerang effect Foodwatch recommends:

1. Promoting pesticide-free agriculture

The EU Commission should set clear and measurable goals to accelerate the transition to pesticide-free agriculture. Foodwatch already substantiated a concrete pathway with a “crop-by-crop approach” in 2022. Both policy-makers and businesses must work to move away from the production and sale of pesticides.

2. Ban on export of pesticides already banned in EU

A total ban on the production and export of pesticides already banned in Europe is necessary for public health and environmental protection across borders and to prevent these substances from returning to the European market through imported products, the so-called “Toxic Boomerang.”

3. No import tolerance for banned pesticides

For trade reasons, the EU casually allows import tolerance for certain pesticides already banned in the EU, through the setting of MRLs that are higher than the detection level. This allows residues of pesticides that are banned in the EU to pertain in food products when they should not. A default maximum residue limit (MRL) of 0.01 mg/kg or at the detection limit should apply to banned pesticides. This prevents these harmful substances from entering the European market legally and protects both consumers and farmers. In addition, it ensures fair competition for European farmers.

Country specific recommendations

4. Better enforcement by the NVWA

The NVWA should reduce the measurement uncertainty from 50% to 10-25%, so that faster and more accurate action can be taken on violations. The NVWA should also be able to act on all forms of banned use of banned pesticides, even if the import MRL is not exceeded. In addition, NVWA must consistently enforce and report every instance of violation.

5. Strict requirements and enforcement by supermarkets

As long as the MRL is different from 0.01 mg/kg or the detection limit, supermarkets must take responsibility by enforcing the requirement that no pesticides banned in Europe can be found on their products. This must be accompanied by strict controls and enforcement, as well as full transparency on compliance with these requirements.

6. Improving communication to consumers

Government and supermarkets must be more transparent about the presence of pesticides in food and its risks. Consumers should have easy access to information about product safety and the measures taken to ensure food safety.

7. Advice to consumers

As long as policy-makers and supermarkets do not set and enforce sufficiently strict requirements, foodwatch recommends buying organically produced food as much as possible. For now, this remains the only way to consume guaranteed toxic-free fruits and vegetables.

Conclusion

The report underscores the urgency for decisive action at all levels— national, European and worldwide. Without comprehensive reform and strict enforcement, Europe's dual standards on pesticides will continue to endanger consumer health, undermine sustainable farming practices, and perpetuate environmental harm. Coordinated efforts are essential to break this cycle and ensure a toxic-free future for food systems.

Source

All the information in this executive summary comes from **De grote gifroute in beeld**

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