



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Food and feed safety, innovation
Pesticides and biocides

Brussels
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Dear Ms Mantingh,

Subject: Your letter of 11 February 2022 calling to prohibit the export of banned pesticides and the import of flowers and ornamental plants with these chemicals and establish maximum residue limits levels

Thank you for your above-mentioned letter addressed to Executive Vice-President Timmermans and Commissioner Kyriakides, who asked me to reply on their behalf.

I would like to inform you that we are aware of findings or residues of pesticides in imported cut flowers and have already discussed this with Member States at the meetings of the Standing Committee on Plants, Animals, Food and Feed in March 2017, May 2017, July 2017, October 2017 and October 2020¹. During the discussions, several studies related to the exposure of florists were referred to (among others, Toumi 2017, also mentioned in your letter).

Last year we made a survey among Member States in the Committee's Working Group on Post Approval Issues, asking whether national legislations or provisions regarding pesticides in commercial cut flowers are in place. The survey also requested additional information related to the import of cut flowers, the control of residues, and if specific risk mitigation measures were implemented at national level to protect people from exposure to pesticides from cut flowers, including all the possible categories of occupations (operators, workers, consumers, residents and bystanders).

The results of this survey revealed that Member States conduct only limited monitoring of residues in ornamental cut flowers. No labelling provision or particular risk mitigation measures are currently in place in Member States. However, as regards the use of pesticides in the production of cut flowers in the EU, Regulation (EC) No 1107/2009 provides that the potential exposure to plant protection products must be assessed before an authorisation is granted, which among others includes exposure of workers and residents living in the vicinity of areas where such products are used, via dermal contact

¹ Available at: https://ec.europa.eu/food/plant/standing_committees/sc_phytopharmaceuticals_en

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and inhalation, both for uses in outdoor fields or greenhouses (depending on the intended use). Such scenarios can be assumed to represent a ‘worst case’ compared to the exposure of florists and, therefore, it can be assumed that the risk assessment is sufficiently protective for florists, whose exposure is typically much lower. Nevertheless, it is good occupational hygiene practice for florists to wear suitable protective gloves and comply with common hygiene rules during activities with frequent plant contact, in particular those that could cause skin injuries. The study of Toumi mentioned above, actually concludes that precautionary measures such as wearing protective gloves are sufficient to prevent health risks for florists.

About the use of banned pesticides outside the EU, the rules on the export and import of dangerous chemicals are defined in Regulation (EU) No 649/2012, which aims to promote shared responsibility and cooperative efforts in the international movement of hazardous chemicals, and to implement the Rotterdam Convention on the Prior Informed Consent (PIC) Procedure for Certain Hazardous Chemicals and Pesticides in International Trade. The PIC procedure consists in sharing information on hazardous chemicals and complying with importing countries’ decisions. The EU Regulation goes beyond that and requires for many substances banned in the EU a country’s explicit agreement before exporting the product in question. In addition, the European Commission in its Chemicals Strategy for Sustainability committed to ban the production for export of hazardous chemicals that are banned in the EU. The Commission is currently considering a number of options for implementing this objective. An impact assessment will be launched in 2022, and the legal proposal is expected for 2023. Consultations will be conducted in the framework of a supporting study.

Summarising, I can confirm that the issue reported in your letter has been brought to our attention already earlier, and that we have discussed it repeatedly with the Member States at meetings of the Standing Committee on Plants, Animals, Food and Feed. As you may have seen, the topic was again on the agenda of the meeting of the Committee on 30 - 31 March 2022, and we specifically drew Member States’ attention to your letter. So far no Member State has asked the Commission to develop legislation to regulate the presence of residues of pesticides in cut flowers.

Yours faithfully,

Klaus Berend
Head of Unit