Equal Standards for All Food: Plea for an EU-Regulation with Mirror Measures for Imported Products from Third Countries

Slow Food Germany calls on the European Union to Erase Double Standards by Implementing Mirror Measures for Foodstuffs Imported from non-EU Countries to Safeguard People, Animals, and the Environment in Third Countries as well as to Secure Transparency for European Consumers and Eliminate Disadvantages for European Farmers

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1 General Introduction

The global food production system is seriously compromising human health, the health of the planet, and the health and welfare of animals. As important as a transformation is needed towards sustainable practices, this urgency has yet to be translated into practice as a priority on the global agenda.

Current industrial food systems, which are based on intensive agriculture, impinge heavily on planetary boundaries and cause around one third of all greenhouse gas (GHG) emissions globally. These practices lead to the depletion of biodiversity on land and at sea and drive rapid deforestation in the Global South. Intensive agricultural practices make excessive use of synthetic inputs while relying on extractive land management and mono-cropping. Industrialized livestock rearing is highly dependent on feed imports and characterized by widespread food loss and waste. These industrialized processes inflict devastating impacts on climate, biodiversity, soil, air, water, and natural ecosystems. Current food production systems create deep imbalances in environmental, economic, and social dynamics, as well as threaten the health and well-being of food producers, consumers, and animals globally.

One of the most critical challenges for the EU and indeed for the entire world is the creation of resilient systems for sustainable and healthy food production. In order to withstand current and future crises, it is imperative to achieve globally adoptable sustainability standards that are aimed at secure food systems that provide good, clean, and fair food for all, operate within planetary boundaries, conserve biodiversity and natural resources, and respect animal welfare. At the same time, this is the only way to ensure the prosperity of a sector of great importance to the European economy and culture and to generate long-term income and well-being for food producers and farm workers. Sustainable alternatives exist, but the focus of governments and market forces on and preference for heavy industrialization makes it difficult for them to thrive.

1.1 A Need for Policy Coherence in the EU: Aligning Food, Agriculture, and Trade Policies

For too long, EU food policies have been made in silos. The Common Agricultural Policy and Common Fisheries Policy have focused on increasing productivity, a goal that has driven the EU food system to produce harmful outcomes like overproduction, overconsumption, overexploitation of fish populations, food waste, and dumping in third countries. The social and environmental dimensions of the food system are addressed in separate policy areas, however, and offer neither a precise course nor consistency. This separation of economic factors from other aims has resulted in policy incoherence, conflicting objectives and significant loopholes, which are especially apparent in view of the myriad of double standards existing for foods imported from third countries, which do not have to comply with standards set for foods produced within the EU.

Because the impact of trade policy on food systems is often underestimated, it is essential that the transition in the EU is not achieved at the expense of third countries – in particular of the Global South – but rather contributes to supporting the development of sustainable food systems across the globe. Indeed, trade liberalization and the failure to introduce effective supply chain governance has fostered a

race to the bottom, allowing the global food industry to drive down prices and conditions in line with the cheapest and least-regulated practices around the world. This is worsened by the ever-increasing market concentration of multinational agri-food industries, which gives them significant price-setting power.

In order to achieve the United Nations Sustainable Development Goals and implement the European Green Deal and thereby to meet the expectations of European society, the EU's trade policy must be brought in line with the objectives of the Farm to Fork Strategy. This means fundamentally rethinking EU trade policy, moving away from the current focus on ever-increasing imports and exports which are driving environmental degradation, human rights violations and animal suffering, as well as disrupting local food markets. Achieving sustainable, healthy and fair food systems in the EU and in partner countries must be an explicit objective of EU trade policy. Environmental and social policy, including animal welfare safeguards, should be binding and enforceable. To begin enshrining these values in actionable policy, the EU should:

- Introduce binding 'mirror measures' in relevant EU legislation while taking due account of the situation of small-scale farmers in the Global South to ensure reciprocity of standards in importation and exportation.
- Ensure that trade policies promote agroecology and support dignified living conditions and a fair income for farmers, supporting non-EU countries to strengthen the resilience of their own food systems.
- Strengthen liability mechanisms for traders importing raw agri-food products and seafood into the EU by expanding corporate accountability instruments across food chain sectors.
- Ensure that hazardous pesticides, which are already banned in the EU, are not produced for export, and ensure that no banned pesticides are allowed as residues in food placed on the European market, as promised under the EU's Chemicals Strategy for Sustainability (CSS).[1]

The preservation of ecosystems, the fight against climate change and health issues are global problems that do not stop at the borders of producer countries. Mirror measures and clauses are therefore an important political lever for greening agricultural practices in Europe and, more broadly, worldwide, while limiting distortions of competition with exporting countries for European farmers. This is why the reciprocity of standards, aimed at ensuring that European production standards also apply to imported products, must be a key principle of European food and trade policies.

1.2 What are Mirror Measures and Clauses?

Goods consumed in the EU are subject to different production standards depending on their origin; the standards for products produced within the EU are currently not applied to products from non-EU countries. **Mirror measures** are provisions integrated into EU legislation and are designed to make access to imported foodstuffs in EU markets conditional on compliance with European production standards. This compliance is in terms of consumer health protection, environmental standards equivalent to those applied to European products, and ethical considerations relating to animal welfare. These are unilateral measures

[1] PAN Europe. "Prohibiting the export of banned pesticides and the import of food produced with these chemicals." Brussels, November 2020. Open letter to First Executive Vice President Frans Timmermans, Health & Food Safety Commissioner Stella Kyriakides, Agriculture Commissioner Janusz Wojciechowski, and Environment, Oceans & Fisheries Commissioner Virginijus Sinkevičius. https://www.pan-europe.info/sites/pan-europe.info/files/Banned_pesticides_open_letter.pdf.

with extraterritorial scope.
Mirror clauses refer to environmental, health or animal welfare clauses included in bilateral trade agreements in order to condition access to import quotas or reduced customs duties for partner countries.

Applied to the agricultural and food sectors, mirror measures and clauses aim to encourage reciprocity of production standards in trade and thus mitigate certain forms of currently existing distortions in competition that negatively impact European farmers.

More broadly, mirror measures respond to several challenges:

- On a European scale: implementing the objectives of the EU Green Deal by guaranteeing the integrity of European standards;
- In third countries trading with the EU: mitigating the impact of unsustainable agricultural practices on the environment and peoples' health as well as helping to improve production standards;
- At the international level: encouraging the adoption of more ambitious and binding international standards.

The common argument that mirror measures are not aligned or compatible with World Trade Organization (WTO) law does not hold any water. In fact, according to a 2022 paper published by Pesticide Action Network (PAN) Europe:

> The European Commission can rely on the preamble of the WTO Agreement and its Article XX, as well as on the SPS (Sanitary and Phytosanitary) Agreement which allows WTO Members to take measures that are stricter than international standards (i.e., Codex CXLs) to protect human, animal or plant life or health that impact international trade, if 'sufficient scientific evidence' is carried out in accordance with Article 5 of the SPS Agreement.[2]

This argument is further supported by an analysis conducted by the Veblen Institute, the Fondation pour la Nature et l'Homme (FNH), and Interbev.[3] Among others, the *Agreement on Technical Barriers to Trade* is shown to allow technical regulations on trade if the objectives are seen as legitimate: "The legitimate objectives listed in Article 2.2 of the TBT Agreement include the protection of animal life or health, the protection of plant health and the protection of the environment. Clearly these reasons could be used to justify a measure aimed at protecting the environment and biodiversity".[4]

Furthermore, Article 2.2 of the TBT Agreement also explicitly mentions the 'protection of human health' and national security legitimate objectives for technical regulations.

[2] PAN Europe. "Application of EU health and environmental standards to imported agricultural and agri-food products." Brussels: PAN Europe, March 2022. Contribution to the call for evidence. p.2. https://tinyurl.com/davwc2u7.

[3] Baldon, Clémentine, et al. "Globalisation: How can we stop the import of food produced using banned practices in Europe? A regulation to stop the import of food from practices banned in Europe: mirror measures in agriculture." April 2021. Veblen Institute for Economic Reform. https://shorturl.at/flQT9.

[4] "Globalisation". p. 54. https://shorturl.at/flQT9.

1.3 The Political Momentum for Mirror Measures

The European Commission has already introduced some mirror measures. For example, the ban on animal products treated with growth hormones was extended to include imports. Mirror clauses have likewise been introduced in the application of European slaughter rules to imported animal products and, more recently, on veterinary medicines (awaiting implementing acts) and neonicotinoids (highly toxic insecticides). In their report, *"Mirror measures: key tools for implementing the European Green Deal",*[5] the Veblen Institute has identified further examples for existing mirror measures. The European Commission and Parliament have raised the question of introducing mirror measures in the past, although these were ultimately not adopted.

The EU Farm to Fork Strategy, in addition to including a target to reduce the use of pesticides by 50% by 2030, also includes reviewing the granting of import tolerances for pesticides banned in the EU, taking account of environmental issues, in particular for the most toxic substances, in accordance with the criteria set out in Regulation 1107/2009. Unfortunately, the *Sustainable Use of Pesticides Regulation* proposal was scrapped after it was rejected by the European Parliament. Despite not being adopted, the proposals received wide support from academics, civil society, and from decision-makers from across the political spectrum, given the urgency of drastically reducing synthetic pesticide use to protect biodiversity, farmers' and citizens' health.

In a 2022 report to the EU Council and Parliament, the EU Commission reminds us that the EU:

> can take autonomous measures relating to environmental or ethical aspects of the process or production methods of imported products [which] also reflect demands of European consumers who are increasingly becoming aware of environmental, health, social and ethical aspects of food production and want to be empowered to choose sustainably produced food.[6]

Several global crises including the climate and environmental ones make it necessary for governments to take action now. Especially the food and agriculture sector is an important lever to counteract current negative developments. The EU has set out to tackle these problems in the food and agriculture sector (with the Green Deal and Farm to Fork and Biodiversity Strategies) with different goals and there are no obstacles for expanding the EU's values and standards to import products from third countries. The extracts from different legal documents and comments by EU institutions confirm that legitimacy exists to protect human, animal, and plant health as well as the environment as such.

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[5] Dupré, Mathilde and Stéphanie Kpenou. "Mirror measures: key tools for implementing the European Green Deal - Initial review and outlook on the 2019-2024 European mandate." Veblen Institute for Economic Reforms, 2023. https://www.veblen-institute.org/IMG/pdf/sept_2023_mirror_measures-_key_tools_for_implementing_the_european_green_deal.pdf.

[6] Council of the European Union. *Application of European Union health and environmental standards to imported agricultural and agri-food products*. Report from the Commission to the European Parliament and the Council COM(2022) 226 Final. European Commission. Brussels, June 2022. https://data.consilium.europa.eu/doc/document/ST-9651-2022-INIT/fr/pdf.

2 The Bitter Aftertaste of Imported Products: Exemplary Analysis of Beef, Soy, and Apples

In order to showcase the large discrepancies that exist between foodstuffs produced in the EU and food that the European Union imports from non-EU countries, Slow Food Germany has undertaken a case study of three foodstuffs: beef, soy, and apples. Through an analysis of these three foods alone, we are able to unmask a myriad of double standards that exist between products from the EU and non-EU countries. The examples given are, however, meant to be exemplary without the claim of being exhaustive. While we dive deeper into some of the aspects like the use of toxic substances and the lack of animal welfare standards, we only briefly touch upon some aspects like workers' rights, biodiversity loss, and land and resource grabbing, which are equally important, but will not be thoroughly analyzed in this report.

We have chosen these three products because they make a clear case for understanding, first, the lack of transparency for European consumers linked to imported foods from non-EU countries that they can buy in Europe. These foods also offer insight into the negative health, social, and environmental impacts incurred by producing countries. We will discuss the missing traceability and animal welfare standards for animal products (beef); how genetically modified foods arrive on our plates through animal feed (soy); and how foods imported from non-EU countries are often treated with very toxic phytosanitary products that are forbidden in the EU. These substances, such as the pesticides used on agricultural fields, are classified in the EU as endocrine disruptors and are toxic for human health, to aquatic organisms, and the broader environment. Many of the active substances used in non-EU countries have been proven to have adverse effects on human health, ecosystems, and living organisms, and thereby constitute a severe threat. The risks are not limited to consumers here, but are especially severe for the people who experience direct exposure in the countries of production where they are known to cause diseases, some of which result in death. These three common imported food products alone demonstrate significant problems arising from incongruencies in standards, policy and practice inside and beyond the borders of the EU.

We recognize that the complexities inherent to the global food system make even settling on key shared points of understanding difficult on the best of days. A surface level discussion of imported soy beans, for instance, quickly expands to concentrated cattle feedlots, deforestation, pollution, and so on. The enormity of the individual topics and the interconnectedness of decision-making and repercussions throughout each subsystem can represent a stumbling block to succinct policy measures, let alone a coherent debate about any one particular topic. However, this complexity should allow the reader to bear in mind the need to craft smart policy solutions that treat the system as a whole, rather than as discrete segments to which to apply individual policy controls.

This report will demonstrate the urgent reasons the EU should adopt standards for imported products that are consistent with EU values and rules, to enable responsible food choices in the consumer economy and to live up to the goals set within the framework of the EU Green Deal and Farm to Fork Strategy. Furthermore, we will illustrate that the urgent need for equal standards is also based in a global responsibility to third country producers because the deleterious effects of such double standards and inconsistencies exert even higher damage potential to life, ecosystems, and biodiversity far beyond political borders.

3 Analysis on Soy

For the following comparative analysis on soy, we chose Brazil because it is one of the two main countries of origin for EU import of soybeans besides the United States. Moreover, along with Argentina, Brazil is a top exporting country for soybean meal. Currently, more than 90% of soy for use in the EU is imported (totaling around 13 million tons (MT) of soybeans and 16 MT of soybean meal) and is almost exclusively destined for animal feed. In fact, around 3.5 MT of soybeans were imported into Germany in 2020-2021, including 1.1 MT from the United States and 0.9 MT from Brazil. Imports of soybean meal totaled 2 MT in the same year.

In contrast to pasture-grazing animals and farming systems that treat animal welfare as a priority of their economic actions, soybeans and soybean meal are key to industrial livestock farming. Because a significant portion of Germany's livestock farming is industrial, massive amounts of protein-rich materials (PRM) like soy are imported to uphold the system's intensive productivity cycle. This style of livestock farming comes at the expense of the environment in the Global South and of German farmed animals, which are held in systems of mass-production where animal welfare is greatly ignored.

Slow Food has long called for a paradigm shift with regard to the unsustainable levels of production and consumption of animal products. By looking at the true costs underlying this system, it becomes clear that the negative externalities of intensive livestock farming are unjustifiable, and that a shift to extensive farming of fewer animals is urgently needed to decrease the need for industrially produced animal feed. In turn, it is necessary to increase local production of plant-based proteins like legumes, both for animal and human consumption.[7]

Severe negative ecological consequences of soy production in the Global South have been widely documented; deforestation in the Amazon, degradation of other ecosystems, and significant losses to soil fertility and biodiversity are direct results of the intensive use of land and resources in third country producers like Brazil. In a nutshell: by sourcing soy from Latin America to maintain an animal farming system for cheap meat production and consumption, Germany is fueling the expansion of soybean cultivation for export in Brazil, Argentina and Paraguay and thus contributes to devastating consequences like deforestation, pollution, soil erosion, loss of biodiversity and negative effects on human health in these countries. The influence of these harms expands further into the social dimension; the seizure of lands from indigenous people and other communities in addition to slavery-like working conditions have also been widely documented and attributed to these soy farms.

3.1 Land Grabbing and Expulsion of Indigenous Tribes

Recent research shows a correlation between the spread of soy and other plantations with the grabbing of land, especially from indigenous tribes. In Brazil, for instance, "[c]onflicts over territorial rights … [have] been aggravated by conflicts motivated by the lease of indigenous lands … for the use and growth of transgenic soy-

[7] Pescador, Rubén Franco, Ottavia Pieretto and Cristina Agrillo. "Policy Brief on Animal Welfare." Slow Food, May 2023. https://www.slowfood.com/wp-content/uploads/2023/12/EN_Policy-Brief-on-Animal-Welfare.pdf.

bean, corn and wheat seeds [...].[8] Many indigenous lands, while "... in the process of having their boundaries reviewed, continue to be devastated by the actions of large agribusiness companies and landowners, who advance into the still preserved areas of the territory with large soy and corn crops and the opening of roads to transport their production.[9]

In Brazil alone, "[f]rom 2008 to 2021, 46.9 thousand hectares were seized and deforested in areas where farms overlap indigenous lands."[10] In fact, this expansion of soy fields has led to considerable suffering for indigenous and rural populations. When soy enters their territories, in addition to experiencing increasing violence and agrochemical contamination, local populations enter a cycle of food insecurity as cultivation areas for staple foods (rice, beans, fruit, and vegetables) decrease year after year.

3.2 Toxic Substances: The Effect on Human Health, Ecosystems, Pollinators, and Other Organisms

One of the main problems for the environment, as well as human health for people in producing countries and consumers in Germany, is illustrated by inconsistent standards for agrochemical use across borders. Particularly concerning is the fact that soybeans are the most pesticide-intensive crop in Brazil. In fact, soy consumes 52% of pesticides used in Brazil, followed by sugarcane (12%), corn (10%), cotton (7%), and coffee (3%).[11] Of the active substances approved for soy production in Brazil,[12] more than half are prohibited in the European Union[13], mainly due to environmental and health concerns.

The double standard in regard to toxic substances does not only concern the use of certain substances themselves but also the way they are applied to crops, some of which have higher environmental implications. One salient example is the herbicide glyphosate, which, while itself is not banned in the EU, does offer an example of a double standard in the way in which it is applied between the EU and non-EU agriculture. In some non-EU countries, it's allowed to spray glyphosate until very late in the crop's development cycle, and not only for GMO-glyphosate resistant soy, also other crops are affected, like lentils from Canada. The "[....] the risk is that glyphosate residues remain in the seeds".[14] This example refers to lentils but clearly shows the complexity of the topic and the series of double standards that the EU needs to tackle.

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[8] "Violation Against Indigenous Peoples in Brazil - 2021 Data." Indigenist Missionary Council (CIMI), 2021, p.19. https://cimi.org.br/wp-content/uploads/2022/11/report-violence-against-the-indigenous-peoples-in-brazil_2021-cimi.pdf.

[9] "Violation Against Indigenous Peoples in Brazil", p. 95.

[10] Castilho, Alceu Luís, et al. "Invaders - Who are the businessmen and corporations whose farms overlap indigenous lands in Brazil." De Olho nos Ruralistas, April 2023. https://deolhonosruralistas.com.br/wp-content/uploads/2023/05/Invaders_ENG-2023.pdf.

[11] Gaberell, Laurent and Carla Hoinkes. *Highly hazardous profits - How Syngenta makes billions by selling toxic pesticides*. Public Eye. Lausanne: Raphaël de Riedmatten, April 2019. https://www.publiceye.ch/fileadmin/doc/Pestizide/2019_PublicEye_Highly-hazardous-profits_Report.pdf.

[12] *Government of Brazil - Ministry of Health*. n.d. 2024. https://www.gov.br/anvisa/pt-br/assuntos/agrotoxicos.

[13] *The calculation was made in march 2024 by crossing the data from the Government of Brazil - Ministry of Health. n.d. 2024. https://www.gov.br/anvisa/pt-br/assuntos/agrotoxicos and from the EU Pesticides Database - Active substances, safeners and synergists. 2024. https://ec.europa.eu/food/plant/pesticides/eu-pesticides-database/start/screen/active-substances*.

[14] Baldon, Clémentine, et al. "Globalisation". p. 24. https://shorturl.at/flQT9.

The negative impacts of some of the toxic substances forbidden in the EU but allowed in Brazil in soybean production are shown in the following chart:

Brazilian Soybean	European Soybean
GMOs allowed	**GMOs forbidden**
Herbicide Glufosinate: May damage fertility, suspected of harming the fetus, toxic to aquatic organisms	**Forbidden in 2018**
Fungicide Chlorothalonil: Supposed carcinogen, toxic to aquatic organisms, chlorothalonil metabolites are found in large quantities in drinking water	**Forbidden in 2019**
Fungicide Mancozeb: Adverse effects on humans (probable carcinogen, reprotoxic) and on aquatic ecosystems	**Forbidden in 2021**
Insecticide Acephate: Toxic for human health and the environment	**Forbidden in 2003**
Insecticide Bifenthrin: Toxic for human health and the environment	**Forbidden in 2019**
Insecticide Fipronil: Acute and chronic health problems in humans, strong impacts on bees	**Forbidden in 2009**
Neonicotinoids: significant harmful effects on biodiversity and in particular bees.	**Neonicotinoids:**
Thiamethoxam	**Forbidden in 2019**
Thiacloprid	**Forbidden in 2020**
Clothianidin	**Forbidden in 2020**
Imidacloprid	**Forbidden in 2020**

The graphic above showcases some of the inconsistencies between EU and non-EU standards and presents the reported negative impacts of each agrochemical. Many toxic substances banned in the EU are permitted in Brazil that greatly endanger the health of agricultural workers and rural people as well as the biodiversity in land and aquatic ecosystems. The harm extends far beyond human wellbeing to birds, insects, and other animals and microorganisms found in the soil and water:

- Insecticides like bifenthrin and acephate are harmful to the health of humans, the environment and important pollinators like bees. They are nonetheless permitted to treat crops like soybeans in Brazil.
- The use of the herbicide glufosinate, a potential endocrine disruptor, has a toxic effect on aquatic life. The fungicide mancozeb also has proven adverse effects on humans and on aquatic organisms.
- Aerial spraying of toxic substances is not specifically banned in Brazil, in contrast to the EU, in which there is an aerial spraying ban, though even this is subject to a number of exemptions. Aerial spraying poses a threat to local communities since the pesticides can spread even further and more exten-

sively than with spraying directly onto fields. In Brazil, aerial spraying is used intensively to apply neonicotinoids on soybean, corn, sugarcane, and banana crops.[15] This class of toxin is particularly harmful to pollinators and to biodiversity and, for this reason, several of them have been banned for use in the EU.[16]

3.3 Pesticide Poisoning

Recent literature acknowledges that citizen vulnerability to the harmful effects of agricultural chemicals is not limited to those whose professions put them in direct contact: "People can be unintentionally exposed to pesticides in various situations: on the field, in the forest, through food or drinking water."[17] In fact, the number of human victims worldwide – those for whom incidental pesticide poisoning has resulted in illnesses or death – is surprisingly high. Globally 385 million people suffer from unintended pesticide poisoning each year; somewhat less surprisingly, 95% live in the Global South.[18] While the greatest threat exists for populations characterized by chronic direct exposure to hazardous chemicals – farm workers and people living in rural areas in the Global South[19] – numerous studies have shown that the rest of the population is likewise subject to increased risk due to indirect pesticide exposure. In Brazil, for instance, unborn babies risk birth defects such as "malformations related to the reproductive system, nervous system, musculoskeletal system, transverse limb deficiencies, digestive system and other malformations such as fetal growth restrictions, cleft palate and congenital heart disease."[20]

In Brazil, the situation is especially alarming: between 2011 and 2021, almost 32,000 cases of pesticide poisoning were recorded. In a similar time frame, between 2010 and 2019, more than 1,800 people died by poisoning from pesticides used on Brazilian farms, i.e. one death from pesticide poisoning every two days, according to the Ministry of Health data cited by geographer Larissa Bombardi of the University of São Paulo.[21] Of course, the situation is not just worrying in Brazil. Other participating countries in the Southern Common Market (Mercosur) trade agreement in South America like Paraguay and Argentina are also experiencing cases of agricultural pesticide poisoning, even if these are less well documented. The people most affected by pesticide poisoning are children, pregnant women, and indigenous tribes. Similar data is also known from the African continent and the Slow Food network in many African countries confirms the growing concern about the use of highly hazardous pesticides on the continent.

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[15] Bombardi, Larissa M. *A Geography of Agrotoxins use in Brazil and its Relations to the European Union*. USP Open Books Portal, April 2019.

[16] Slow Food. *Neonicotinoids Finally Off the Table!* 27 April 2018. https://www.slowfood.com/neonicotinoids-finally-off-the-table/.

[17] Bollmohr, Dr. Silke. *Toxic Business - Highly hazardous pesticides in Kenya. Route To Food Initiative. Nairobi.* Heinrich Böll Stiftung, September 2023, p.31. https://ke.boell.org/sites/default/files/2023-09/data-and-facts_highly-hazardous-pesticides-in-kenya-1.pdf.

[18] *Toxic Business*, p.31.

[19] Bollmohr, Dr. Silke. *Pesticide Atlas - Facts and figures about toxic chemicals in agriculture*. Berlin, Brussels: Heinrich Böll Stiftung, Friend of the Earth Europe, Bund für Umwelt und Naturschutz, PAN Europe, 2023. https://smallplanetinstitutereal.app.box.com/s/efisbev9xn10f357fabcor3v45j8gjcb.

[20] Costa, Nathalia Zorzo, et al. "Exposure to toxic agrochemicals and development of congenital malformations: A scoping review." Universidade Federal de Pós Graduação em Enfermagem, August 2021. https://tinyurl.com/2p9pbpcs.

[21] Bombardi, Larissa M. *"Geography of Asymmetry: the vicious cycle of pesticides and colonialism in the commercial relationship between Mercosur and the European Union."* OCAA, May 2021. https://ocaa.org.br/en/publicacao/geography-of-asymmetrythe-vicious-cycle-of-pesticides-and-colonialism-in-the-commercial-relationship-between-mercosur-and-the-european-union/.

A new study from the US establishes a link between the rise in cases of childhood leukemia, the expansion of soy cultivation and the widespread use of pesticides on soy plantations in Brazil.[22] The study, published in the journal Proceedings of the National Academy of Sciences (PNAS), documents that at least 123 additional deaths in children under the age of ten between 2008 and 2019 are linked to the use of pesticides in soybean cultivation in the Cerrado humid savannah region and the Amazon rainforest.

These human casualties of the globalized industrial food system can no longer be ignored by the European Union. We cannot support through silence this reliance on highly hazardous and carcinogenic pesticides and other phytosanitary products. Partner organizations and our network from the Global South are therefore calling on the European Union to shift investments and economic actions to models of sustainability. As the pesticide expert Debbie Muir of UnPoison South Africa rightfully asked the EU, "Are your children more valuable than ours?" Her comments drive to the heart of the hypocrisy, addressing the fact that the EU exports hazardous phytosanitary products to Africa – being well aware that they are fatal for human life – and at the same time blocks the import of some of the products at European borders treated with these very substances because the residue levels exceed Europe's own Maximum Residue Limits (MRL). This standard proves an undeniable awareness of the toxicity of these products and the overt and open willingness of the pesticide industry to disregard life by exporting them regardless.

How can the EU tolerate poisoning populations and ecosystems in third countries? As we see it, this behavior plays only in the hands of the industry and discriminates against and shifts accountability to the third countries being affected by poisoning. It is a hypocrisy and double standard that Europe is the biggest exporter of toxic pesticides to the Global South, many of which are forbidden for use here in the EU. The EU should put human and planetary health before the profits of large chemical corporations.

On the upside, aligning the standards for imported products would benefit human and environmental health in the EU and in producing countries, and eliminate unfair competitive advantages for imported products. It is important, within the space of this argument, to recognize the difficulty for European farmers to transition to more sustainable farming practices to meet EU Green Deal objectives while also having to compete with products produced in regions with significantly lower or no environmental standards. As long as there is no reciprocity of standards, local farmers will have to compete with potentially cheaper imported products from non-EU countries. These challenges have risen precipitously to the surface in recent months as farmers in Germany and across Europe have been protesting, among other reasons, because of unfair double standards between local and import products.

[22] Skidmore, Marin Elisabeth, Kaitlyn M Sims and Holly K Gibbs. *"Agricultural intensification and childhood cancer in Brazil."* Proceedings of the National Academy of Sciences, 120.45, November 2023, https://tinyurl.com/5yj9f49u.

3.4 Genetically Modified (GM) Soy

Germany banned the cultivation of genetically modified organisms (GMOs) in 2015, alongside 17 other governments in the EU, due to consumer rejection of GMOs. More recently, both the German agriculture ministry[23] and large German retailers[24] have stated their opposition to the deregulation of new genomic techniques due to pressure from civil society concerned with these products.

Although there is no EU-wide blanket ban on the cultivation of GMOs, only one GM crop is currently being produced in the EU by Spain. However, especially in non-EU countries, more GM crops tend to be authorized, as it is the case with soy. In Brazil, for instance, genetic engineering is permitted for the cultivation of soy, in contrast to rules forbidding it in the EU. In fact, a large majority, 77%, of the soy produced worldwide is genetically modified; a staggering 94% of US-grown and 97% of Brazil-grown soy is genetically modified.[25] This means that, despite a local regulatory environment that favors non-modified soy in the EU, GMOs still make it onto European plates through the backdoor, for example, in products from animals fed with it. Labeling regulations are also to blame; in the case of animal feed, there is no labeling on the final animal product indicating that the animal was fed with GMOs, despite the fact labeling of GM food imports is mandatory. This absurd system continues despite strong opposition from the European Parliament, which routinely rejects the authorization for GM food imports. Moreover, a majority of Europeans have expressed the wish for more transparency in labeling GMOs. According to a 2021 IPSOS poll, for instance, 78% of Germans polled who had heard about GMOs agreed or strongly agreed that GMOs should be clearly labeled.[26]

The development and use of GMOs is also strongly correlated with a dramatic increase in the agricultural application of glyphosate, a highly effective broad-spectrum herbicide that the World Health Organization has categorized as a 2a carcinogen, meaning it probably causes cancer in humans. “Roundup Ready” soy, for example, is imported as for animal feed. A proprietary GM soy variety produced by Bayer/Monsanto, Roundup Ready seeds are resistant to glyphosate-based Roundup, also a Bayer/Monsanto product. Global demand for cheap animal feed and efficacy in protecting monocrops like soy have helped pave the way to heavy treatment of glyphosate in countries like Argentina and Brazil.

Another problem is that maximum residue limits (MRLs) for products tend to vary.[27] The MRLs for some of the toxic substances allowed for treating soy crops (for example concerning acephate, glufosinate, or glyphosate) are set extremely high compared to the allowed MRLs for other crops. On top of that, MRLs may also be established or revised upon request from parties with a legitimate interest, including

[23] Dahm, Julia. “*German agri ministry opposes gene editing deregulation”.* Euractiv. March 2023. https://www.euractiv.com/section/agriculture-food/news/german-agri-ministry-opposes-gene-editing-deregulation/

[24] VLOG – Lebensmittel ohne Gentechnik. “*German food businesses launch new initiative for freedom of choice regarding genetic engineering in food”*. September 2024. https://www.ohnegentechnik.org/en/news/article/german-food-businesses-launch-new-initiative-for-freedom-of-choice-regarding-genetic-engineering-in-food

[25] Heinrich Böll Stiftung. *Meat Atlas 2021*. September 2021. https://eu.boell.org/en/2021/09/07/feed-soy-forest-and-savanna

[26] Foote, Natasha. „Report: majority of consumers want compulsory labelling on all genetically modified food“. Euractiv, April 2021. https://www.euractiv.com/section/agriculture-food/news/report-majority-of-consumers-want-compulsory-labelling-on-all-genetically-modified-food/

[27] European Commission. “Pesticide residue(s) and maximum residue levels (mg/kg)”. https://ec.europa.eu/food/plant/pesticides/eu-pesticides-database/start/screen/mrls/details?lg_code=EN&pest_res_id_list=120&product_id_list=

companies manufacturing these products for “import tolerance”. Concerning the MRL of glyphosate, for instance, the pesticide company Corteva requested and obtained an import tolerance in 2021 for GM soybeans imported from the US.[28] This clearly negatively impacts consumers of animal products fed with this soy in the EU.

3.5 Imported Deforestation

Soybean production monopolizes around 100 million hectares of agricultural land worldwide, an area equivalent to the size of France, Germany, Belgium, and the Netherlands combined.[29] This puts enormous pressure on land use in producing countries, particularly Argentina and Brazil. In these countries, vast areas of forest, grassland and savannah have been razed, transformed or degraded, significantly contributing to climate change and biodiversity loss. The link between high demand for imported soy, especially from South America, and the deforestation of huge areas needed to cultivate the supply, is readily apparent. It is not a stretch to couple imports with the knock-on effects of habitat loss, cultural destruction and violence associated with land grabbing, as we have previously discussed. The latest EU regulation on "imported deforestation", the EU Deforestation-Free Regulation (EUDR), will only prevent imports from recently deforested areas (from 2021) and only affects areas like the Amazon, but not South American savannahs like the Cerrado or Chaco, or other continents like Africa and Asia.

Europe should stand up for its contribution to deforestation and either extend the existing EUDR to all geographic areas and make it more holistic, or pass a separate overarching regulation with mirror measures that include deforestation. It is clear that this means taking global responsibility and owning up to the fact that there is no way around switching to sustainable food systems if we want to act responsibly without dumping the negative consequences and external costs of our industrial food production on third countries mostly in the Global South.

3.6 What Needs to Be Done

This comparative analysis of soy showcases the imperitive for the EU to shift away from industrial livestock farming systems that greatly rely on animal feed from the Global South. Instead, the EU should give way for meaningful, positive investments that benefit and not harm the economy, environment, and health of people and animals in third countries. This can be achieved by establishing EU standards for all products marketed in the EU, which will incentivize farmers exporting to the EU to improve their farming practices. By using policy tools to incentivize more sustainable land and resource use in the Global South, the EU would be actively internalizing responsibility for the externalized costs of this industrial system that we currently oblige third countries to pay. These steps would pave the way for positive imports that reduce harm on people and the environment. The adoption of binding and consistent standards for non-EU imports would also play an important role in avoiding burdening European farmers with economic disadvantages. The use of destructive farming practices and agrochemicals banned in the EU offers an economic advantage through the market distortion of environmental competition with Brazil

[28] EFSA Journal. “*Setting of an import tolerance for glyphosate in soyabeans*”. October 2021. https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2021.6880

[29] WWF. “La demande de soja pour l’elevage en Belgique”. Factsheet, 2019. https://wwf.be/sites/default/files/2021-04/Factsheet-SOY-final-FR.pdf

(and other countries). Consistent standards would offer a resolution to this problem and serve as an economic win to farmers here in the EU.

On a national level, Slow Food Germany welcomes the plan of the Germany Agricultural Ministry to implement an export ban for pesticides that are unauthorized in the EU. We encourage the Ministry to maintain its implementation and advocate for an EU-wide export ban of pesticides that are not authorized in the EU, especially highly hazardous pesticides (HHPs).

4 Analysis of Beef

For this report we have chosen beef as a symbolic product to illustrate the problems resulting from the lack of mirror measures on animal welfare, traceability for imported animal products, and the consequences on human health due to the use of antibiotics as growth hormones in some imported products.

The self-sufficiency rate for beef in Europe is high, with imports accounting for just 5% of total consumption. A large proportion of these imports are concentrated on a specific chosen product, namely the sirloin muscles, which account for just 18% of the carcass and yet comprise around a third of its value, which has certain implications for EU and foreign markets.[30]

Despite decreasing meat consumption in Germany, beef and veal imports have been growing in the past years and international trade agreements like Mercosur are bound to fuel these numbers. For example, the conclusion of the EU-Mercosur agreement provides for the concession of an additional quota of 99,000 hundredweight (cwt) of beef at a reduced customs duty (7.5%) to the EU. Such a volume conceded for low-cost imports into the European market could have far-reaching consequences.

In their report *Globalisation: How can we stop the import of food produced using banned practices in Europe?* the Veblen Institute and the Fondation pour la Nature et l'Homme analyzed the practices forbidden in Europe but which are tolerated by North and South American counterparts. They concluded that, while the exports to the EU are increasing, they are always less compliant with EU norms. One example is allowing the use of meat and bone meal as animal feed, as well as the use of antibiotics as growth promoters in ruminants.[31]

4.1 About Animal Welfare and the Lack Thereof

Animal welfare standards and a respect toward animals should be part of an overarching European legislative framework applied to imported products. A lack of such standards illuminates disparities between the EU and producing countries, which have to deal with detrimental environmental effects, and the animals have to suffer due to bad living conditions resulting from weak, nonexistent, or unenforceable rules.

With regard to animal transport, the Council Regulation (EC) No 1/2005 of 22 December 2004 on the protection of animals during transport and related operations provides that journeys shall not exceed eight hours for adult cattle and unweaned calves in standard vehicles, and 29 hours for adult cattle, with compulsory breaks every 14 hours for watering and feeding. The requirements are even stricter for unweaned calves. However, the regulation goes on to state that, where certain vehicle standards are met, animals can be transported for much longer periods. Currently, new legislation on transport providing for limited journey times is under discussion, but not even the current minimum obligations applicable in the EU with regard to animal transport conditions apply to imported meat: “The health certificate for the import of beef into the EU only covers the animal welfare requirements for slaugh-

[30] Buczinski, Baptiste, et al. “The EU-Mercosur FreeTrade Agreement, its impacts on Agriculture”. May 2023. Greens/EFA Group. https://www.greens-efa.eu/files/assets/docs/mercosur_en_study.pdf

[31] Baldon, Clémentine, et al. "Globalisation". p. 6. https://shorturl.at/flQT9.

ter".[32] In Australia, for instance, it is possible to transport cattle for up to 48 hours before slaughter.

4.2 Feedlots

Major problems for humans, animals, and the environment arise from industrial feedlots, intensive farming facilities which are used to pen and quickly fatten thousands and thousands of animals.[33] With the exception of the United Kingdom, a troubling recent trend is that most of the EU's trade partners "have or are increasingly developing feedlots in order to export to the EU".[34] "Confining cattle on feedlots and feeding them highly concentrated grain diets adversely impacts animal health and welfare, as well as harming the environment and threatening public health. Cattle raised in feedlots disproportionately suffer from respiratory diseases, the number one cause of mortality in these systems, followed by digestive problems, calving, and death resulting from extreme weather conditions. Feedlots are also detrimental to the environment and to public health. Indeed, they produce huge amounts of animal waste and other pollutants that can be harmful to the environment".[35]

When assessing standards, our policy makers should consider unintended consequences where possible. For example, "the new EU regulation on imported deforestation might also contribute to the development of feedlots in South America"; farmers who want to avoid using larger amounts of land for extensive animal husbandry may be incentivized to concentrate them in these feedlots in order to be considered compliant for importation under the EU regulation.[36] In this case, a positive development for land use results in livestock farmers setting up more crammed stalls. This example is a good reminder for EU policy makers to think holistically about regulation for imported foods. The good news is that mirror measures can cover all parts of food production to ensure that one positive measure does not worsen standards somewhere else within the food production chain. Trying to avoid deforestation should therefore be thought of holistically within the whole system of food production.

4.3 Traceability

Full traceability of animals from birth to slaughter is mandatory in the European Union, but this requirement does not apply to animal products imported from outside the EU. The extension of EU requirements for individual traceability of animals whose products will be exported to the EU is absolutely necessary for the effectiveness of all mirror measures concerning livestock farming, such as the ban on meat-and-bone meal in ruminant feed. Traceability is also necessary for the effective implementation of various other regulations, such as the one on imported deforestation relating to beef.

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[32] Baldon, Clémentine, et al. "Globalisation". p. 29. https://shorturl.at/fIQT9.

[33] Slow Food. "BEYOND WELFARE: WE OWE ANIMALS RESPECT". Position Paper, 2022. https://www.slowfood.com/wp-content/uploads/2023/12/EN_2022_AW_SF_position_paper.pdf

[34] Pérez Vega, Daniel. "Stop cruel imports! Applying EU animal welfare standards to all products placed on the EU market". September 2023. Eurogroup for Animal. p.16. https://www.eurogroupforanimals.org/files/eurogroupforanimals/2023-10/2023_09_26_efa_Stop_cruel_imports_pb.pdf

[35] "Stop cruel imports!". p. 17.

[36] Eurogroup for Animals. "EU to ban certain animal products that contribute to deforestation from the EU market". December 2022. https://www.eurogroupforanimals.org/news/eu-ban-certain-animal-products-contribute-deforestation-eu-market

Traceability is also necessary to guarantee transparency for end consumers in Europe, who buy these products and who should have the right to know what they eat. The following report offers more context for such a regulatory need:

> Traceability is also necessary to ensure respect for human rights and environmental protection throughout the production chain. This is a real issue: we know that the major Brazilian meat industry groups (JBS and Minerva) buy their supplies from cattle farms where working conditions are akin to slavery (extremely low wages, inadequate housing, appalling sanitary conditions, etc.).[37]

This suggests even more reasons the EU should adopt monitoring systems and clear standards for imported foods.

4.4 The Use of Antibiotics as Growth Promoters as Threat to Human Health

The EU has banned the use of antibiotics as growth promoters since 2006 and has introduced further restrictions under the 2018 Veterinary Medicines Regulation. This regulation prohibits the use of antibiotics in animals as a preventive measure to compensate for poor hygiene, inappropriate rearing conditions, or lack of care. These bans are justified, in particular, in view of the need to combat growing antibiotic resistance, which represents a considerable health threat that is recognized worldwide.[38] Antimicrobial resistance (AMR), the result of the excessive use of antibiotics, leads to the selection of bacteria capable of resisting them. Of all the antibiotics used in the world, around 70% are used in livestock farming.[39] The emergence and diffusion of resistant strains of bacteria question the effectiveness of antibiotics, in humans as in animals. In fact, these bacteria resistances can pass from animals to humans and vice versa, by contact directly, through the food chain, or indirectly through the environment.

While growth hormones for cattle breeding are banned in Mercosur countries (such as Brazil and Argentina) as they are in the EU, this is not the case for certain antibiotics used as growth promoters. Making a cohesive regulatory push more complex a task, the Mercosur member states have different policies. For instance, in Brazil, many active molecules are now banned for use in animal production due to increasing antibiotic resistance, but many molecules are still missing from the banned list. Naturally, the continued use of these antibiotics as growth hormones constitutes a health threat.[40]

4.5 A Glimpse of Hope?

In theory, and for the first time, the Veterinary Medicinal Products (VMP) Regulation (EU) 2019/6 included a mirror measure whereby the ban on the use of antibiotics in

[37] Baldon, Clémentine, et al. "Globalisation". p.31. https://shorturl.at/fIQT9.

[38] World Health Organization. "Stop using antibiotics in healthy animals to prevent the spread of antibiotic resistance". November 2017. https://www.who.int/news/item/07-11-2017-stop-using-antibiotics-in-healthy-animals-to-prevent-the-spread-of-antibiotic-resistance.

[39] Four Paws International. "Intensive Animal Farming Fuels Deadly Risk of Antimicrobial Resistance". November 2023. https://www.four-paws.org/our-stories/press-releases/november-2023/intensive-animal-farming-fuels-deadly-risk-of-antimicrobial-resistance

[40] Anses. "Antibiorésistance en santé animale". 2021. https://www.anses.fr/fr/system/files/Press2021DPA01.pdf

animals to promote growth or increase yield applies to third country operators. This mirror measure is consistent, not least with the eminently global nature of the threat posed by antimicrobial resistance, as noted in the preamble to the regulation:

> Resistance to antimicrobial drugs for human and veterinary use is a growing health problem in the EU and worldwide. Because of its complexity, its cross-border dimension and the economic cost it represents, and beyond the serious consequences it has for human and animal health, this resistance has become a public health problem on a global scale, affecting the whole of society and requiring urgent and coordinated inter-sectoral action, in line with the One Health concept of the WHO.

However, the mirror measure is not yet enforceable, as it lacks an implementing act which, among other things, would set out the list of approved third countries authorized to export products of animal origin to the EU. Once this implementing act is published, it will take another two years for the mirror measure to take effect.

4.6 Policy Change

Slow Food believes that consumers have a right to know how their food was produced. However, the discrepancies in regulations in place for beef production make it clear that the lack of standards for imported food from non-EU countries has a negative impact on the quality, transparency, and healthiness of food consumed in the EU, as well as on animals in the producing countries. In addition, inconsistencies between local and imported goods create a distortion of competition that puts local farmers at a disadvantage, as they have higher production requirements.

Extending the EU's requirements for individual traceability to foods from animals exported to the EU is therefore a *sine qua non* for the effectiveness of all the mirror measures concerning livestock farming. These include the ban on growth hormones and meat-and-bone meal as well as the guarantee of minimum animal welfare conditions during transport. Traceability is also a prerequisite for the effective implementation of rules on imported deforestation relating to beef.

As a corollary to the examples illustrated above, Slow Food believes that it is necessary to implement a separate, holistic regulation that comprises mirror measures covering all necessary standards related to food production and trade. This approach would help identify and avoid creating the conditions of unintended consequences, like the mirror measure on deforestation that led to an increase in feedlots, effectively worsening another standard. We cannot look at just one aspect; rather, we need to consider the overall production chain in the planning and execution of future policy measures. What is needed is a holistic view of sustainable food systems, rather than the piecemeal approach that addresses one issue at a time. Slow Food will therefore continue to advocate for a systemic approach for sustainable food systems in the EU that considers the entire food production chain of imported products from non-EU countries.

5 Analysis of Apples

For this report, we chose apples as a representative fruit because, in Germany, the apple is the most popular fruit when measured by figures of production and consumption. German apple production satisfies 65% of the country's demand. Apples from non-EU countries are imported to cover consumer demand in the off-season and are mostly supplied by producers in the southern hemisphere, including Chile, New Zealand, and South Africa. Since the apple is globally one of the products treated with most pesticides – about 10 to 30 applications of phytosanitary products in the orchard – it makes for an interesting product to study the environmental and health impacts on EU consumers as well as for people and the environment in producing countries. Though the apple is meant as a stand in for all fruits (and vegetables) consumed in Germany and the EU and imported from the Global South, in fact, the percentage of other kinds of imported produce (especially of tropical fruits) is very high. This case study helps give an idea of the overall land and resources used for European consumption in the Global South.

5.1 Toxic Substances

A lot of active substances have been banned in Europe, yet continue to be used in fruit production in certain exporting countries, including on apples. In the EU, there are a total of 195 banned substances for use in agriculture and 269 substances that are not approved (as of 01/04/2022). In comparison, as apple exporters to the EU, Chile has only banned 27 substances, New Zealand 28, and South Africa 17.

The use of these substances leads to negative impacts on the health of people, ecosystems, and animals. In Chile, for instance, many of the used pesticides – like neonicotinoids – have deleterious effects on biodiversity and natural resources like water and soil. Neonicotinoids are particularly harmful to pollinators. Even at very low doses, they affect the central nervous system of bees; these exposures impair their sense of orientation and ability to reproduce. Furthermore, neonicotinoids are particularly dangerous because, as systemic pesticides, they are taken up by the plant and transported throughout the plant. They are persistent neurological agents which remain in soils for months or even years, causing large-scale contamination of soils, water, and vegetation.

The negative impacts of some of the toxic substances forbidden in the EU but allowed in Chile in apple production are shown in the following chart:

Chilean apples	European apples
Herbicide Glufosinate: May damage fertility, suspected of causing fetal harm, toxic to aquatic organisms	**Forbidden in 2018**
Fungicide Thiophanate: Classified as harmful, suspected carcinogenic effect	**Forbidden in 2020**
Fungicides Mancozeb and Maneb: Adverse effects on human health (probable carcinogen, reprotoxic) and on aquatic ecosystems	**Forbidden in 2021**
Insecticide Phosmet: Likely to harm human fertility (reprotoxic), toxic to insects including bees, very toxic to aquatic organisms	**Forbidden in 2022**
Neonicotinoid insecticides (significant harmful effects on biodiversity and in particular bees):	**Neonicotinoid insecticides:**
Imidacloprid	**Forbidden in 2020**
Thiamethoxam	**Forbidden in 2019**
Thiacloprid	**Forbidden in 2020**

5.2 What Needs to Be Done

The collapse of biodiversity and, in particular, of pollinator populations is a problem of monumental stakes and that which is borderless in nature. Losses of biodiversity in one part of the world bears marked impacts on the rest of the world, the consequences for which compound into the future. The loss of pollinators goes hand in hand with increasing food insecurity. Without pollinators, food production will become increasingly difficult. This is why banning hazardous pesticides, especially neonicotinoids to protect European bees is important. Continuing to import agricultural products that use a large quantity of neonicotinoid insecticides that endanger biodiversity in producing countries is inconsistent. This is especially deceptive since the EU continues to synthesize and export these harmful products to the rest of the world.

We therefore propose that the EU implement an export ban on all highly hazardous pesticides to the Global South. Exporting harmful pesticides is a violation of basic human rights to life and health, especially since the damaging consequences these

products have on local populations has long been established. Higher profit margins for corporations marketing these products and a desire for cheap food should not corrupt basic human values.

Secondly, we propose that the EU prohibit the import of products treated with substances that are not allowed in the EU, instead of relying on the currently used system of maximum residue limits. This is especially in light of the fact that the EU Pesticide Regulation can be subject to poor application within the EU when it comes to imported products. The Maximum Residue Limits (MRL) Regulation, for its part, shows numerous limitations:

- Crops produced outside the EU may have been treated with substances not authorized in the EU on the sole condition that the imported foodstuffs comply with the MRLs set for a certain crop.
- Import MRLs may be revised upwards upon request. The high MRLs for some substances allowed in soy production show that the EU makes use of this on the cost of consumer and planetary health.
- There is very little MRL control on animal feed, which constitutes a large part of the European imports. This serves as a significant advantage to the meat and pesticide industry.

As a minimum and short-term goal, the EU should set the MRLs for all pesticides that are banned or unapproved in the EU to the detection threshold, including crops intended solely for animal feed, energy, or ornamental uses.

In February 2023, a regulation prohibiting the import of products containing traces of the neonicotinoids thiamethoxam and clothianidin was adopted. The European Commission is proposing to lower the MRLs to the detection threshold for these two substances by March 7, 2026 meaning that if these molecules are detected in a product after this date, the product would automatically be excluded from the European market. This regulation sends an important message: the EU Commission is beginning to rely on environmental criteria – and not just a health one – to justify such a ban. This is a good start, though it needs to be extended because two other EU-banned neonicotinoid family molecules, thiacloprid and imidacloprid, are not considered under this regulation.

6 Conclusion

The legal, political, and ethical arguments exemplified in this comparative analysis alone make a strong case for implementing mirror measures for imported foods. The EU can no longer justify importing food that does not meet EU requirements. The existing regulatory environment tacitly supports products and practices that poison people in third countries through the application of highly hazardous pesticides, contributes to the deforesting of enormous amounts of land to produce animal feed (soybeans) for our industrially farmed animals and other foods consumed in the EU. This is why the EU should take a precise look at the implications trade agreements (like Mercosur) have on the food production chain. These trade agreements contribute to an increase of imported products that do not meet EU standards and were strongly contested by conventional and organic farmers associations during the farmers protests in early 2024. Food should not be treated like any other commodity within the context of these trade agreements: Due to its unique role in human health, certain social and environmental standards should apply.

In terms of trade agreements, the EU must guarantee that any new bilateral trade agreement must, as a minimum, integrate reciprocity obligations in a binding manner. These obligations should include mirror measures linked to protecting public health, the environment, and guaranteeing animal welfare standards. To date, none of the bilateral agreements already concluded (like Mercosur) or already ratified at European level (like CETA) contain binding clauses on these subjects. Thus, while awaiting the effective implementation of unilateral mirror measures, the EU must refuse the ratification of any bilateral trade agreement that does not contain at least specific mirror clauses.

We hereby call on European policymakers to put an end to double standards and adopt mirror measures for non-EU foods. As we have proposed, these measures should fall under one regulation on imported products with specific mirror measures giving attention to all aspects of the food chain, but especially regarding animal welfare, social and health standards, pesticides, and sustainable land use. Naturally, the objective of the proposed regulation is to reduce harm to people, animals, and the environment in the EU and in producer countries without unintentionally causing harm in other parts of the food chain. The preservation of the status quo signifies an acceptance of fueling the established system, which has taken its toll on human lives as well as natural resources such as water, soil, and biodiversity. European standards, whilst far from being high enough to drive a transition to sustainable food system, should represent the bare minimum for all products that make it into European households.

In terms of concrete measures, Slow Food proposes that the EU treat imported foods with the same safety measures as domestic foods and thus apply in terms of phytosanitary products the assessment done for Europe. By setting the tolerance for pesticides, which are not authorized in the EU, to zero for imported food products in the long term, the EU will be ensuring the protection of consumers from harmful residues in their food and helping to protect third countries from environmental destruction.

The European Union must also stop participating in unfair practices and appropriation in the Global South, which lead to externalizing the negative effects of the industrial food systems used to produce foodstuffs for the European market. The ex-

ploitation of natural resources in third countries threatens food security and further perpetuates inequality in the Global South. By making the shift towards sustainable food systems and adopting the same standards for all, the EU would not only make a strong case for equality for European and non-European farmers, but it would enable a transition towards sustainable food systems outside of the EU as well. After all, European decision-makers have a responsibility to European consumers, who have expressed a desire to know what they are eating through e.g. traceability measures, but also owe it to citizens of the Global South, who are equally deserving of the right to life as a basic human right.

We ask decision-makers to implement the precautionary principle enshrined in European law to the assessment of imported food products. It is the EU's duty to European citizens to identify and eliminate loopholes and to ensure fair, healthy, and safe food consumption in the EU. This in part means, for instance, a rethink of the MRL approach, which is currently used for imported products treated with dangerous substances and which is also subject to many self-defeating exceptions and loopholes.

In order to achieve these goals, it is vital to assist farmers in the Global South in this transition process, to put in place systems to support exporting countries from the Global South to meet the higher standards, and to transition to agroecological food systems. Europe is at the forefront of banning phytochemicals in the world and can therefore lead the way in supporting exporting countries in this same direction, drawing on the experience acquired. These best practices can include alternative farming techniques or substances, observation of impacts on production and economic results, and consideration for the reception of restrictions among European producers. It is further necessary to put an monitoring, assessment, and compliance system in place that can verify whether standards have actually been met.

Last but not least, we cannot lose sight of our commitments within Europe to the objectives of the EU Green Deal. We can only achieve the goals if we uphold the values of the Green Deal and apply the same standards to products produced both in Europe and abroad. It will only be possible to convince European farmers to accept and identify with the EU Green Deal if we show our responsibility to them through action, by reducing disadvantageous market distortions and by guaranteeing reciprocal standards. As long as double standards exist, farmers here will not be willing to adapt accordingly. This is why we call on you to ensure consistency and to commit to the Green Deal, which is so desperately needed to improve life on our planet.

We call on you today to bring this topic to the discussion table and implement the following recommendations that will safeguard our ability to produce and enjoy food and secure the future of our planet and of future generations.

7 Political Demands

- Condition access to the EU market on compliance with essential EU standards, for instance by putting in place a **regulation to mitigate the environmental and health impacts of food imports** as well as by **introducing mirror clauses in food trade agreements**, to encourage reciprocity of production conditions in trade, and thus mitigate the distortion of competition against European farmers.
- Ensure that trade policies do not have harmful consequences for the environment, livestock, and the health of people, in Europe and in third countries.
- Ensure that the **full traceability of animals from birth to slaughter** – which is mandatory in the EU – is also applied to imported animal products.
- Ensure that hazardous pesticides banned in the European Union are not produced for export and **ensure that no banned pesticides are allowed as residues in food placed on the European market**, as promised under the EU's Chemical Strategy for Sustainability.

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Slow Food hat sich zum Ziel gesetzt, eine Ernährungswelt zu schaffen, die auf fairen Beziehungen basiert, die biologische Vielfalt, das Klima und die Gesundheit fördert und es allen Menschen ermöglicht, ein Leben in Würde und Freude zu führen. Als globales Netzwerk mit Millionen von Menschen setzt sich Slow Food für gutes, sauberes und faires Essen für alle ein. Slow Food Deutschland wurde 1992 gegründet und ist mit vielfältigen Projekten, Kampagnen und Veranstaltungen auf lokaler, nationaler sowie europäischer Ebene aktiv. Mit handlungsorientierter Bildungsarbeit stellen wir Ernährungskompetenz auf sichere Beine. Ziel unseres politischen Engagements ist ein sozial und ökologisch verantwortungsvolles Lebensmittelsystem, das Mensch und Tier, Umwelt und Klima schützt. **www.slowfood.de** • V. i. S. d. P.: Dr. Nina Wolff