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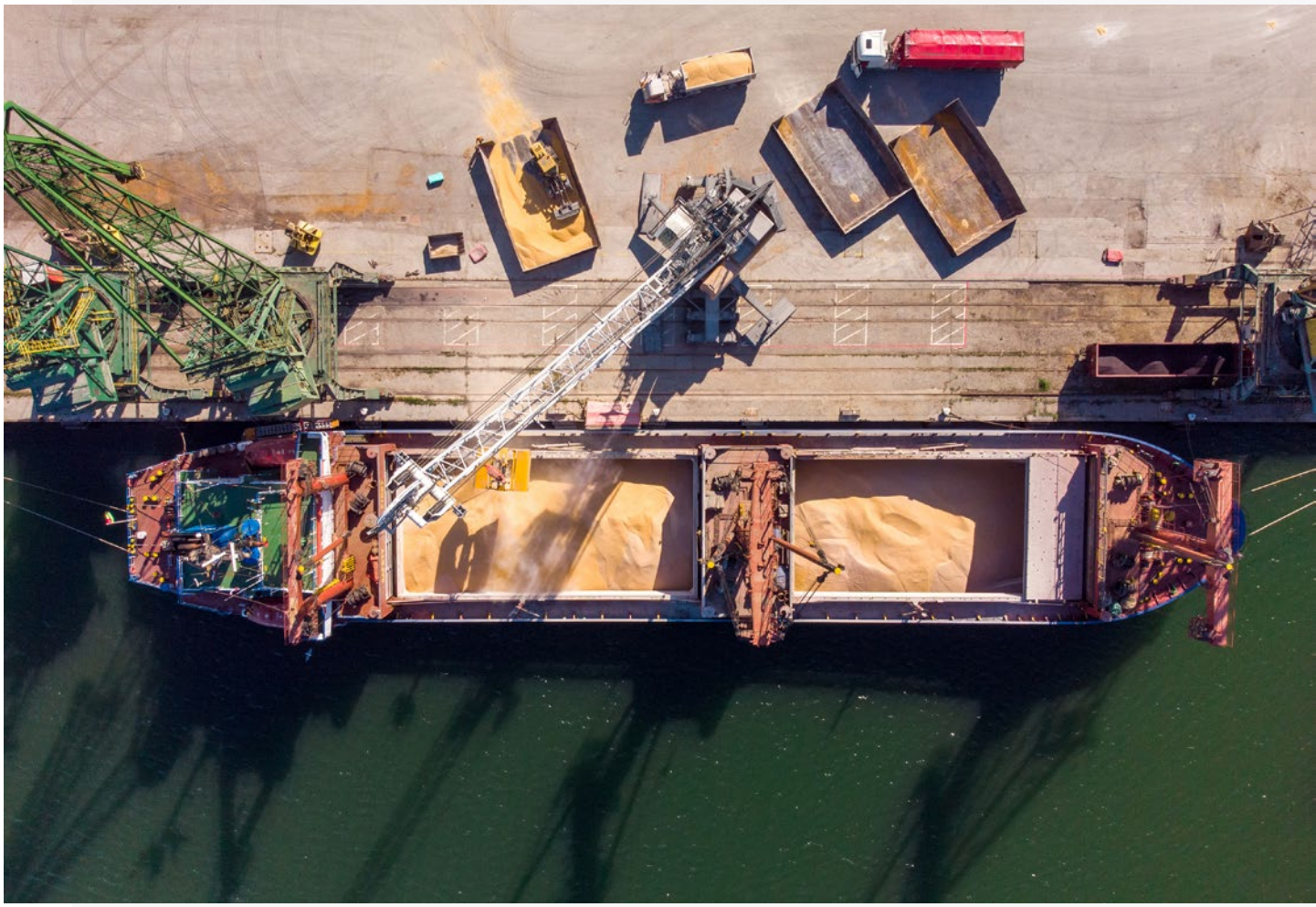
Double standards on our plates

Using mirror measures to mitigate the impacts of EU trade policy, for a sustainable food system



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SUMMARY

EXECUTIVE SUMMARY

The global food system, heavily reliant on intensive agriculture, is driving environmental degradation, socioeconomic disparities, and climate change. The EU, as a major market, significantly impacts global food trade through its consumption and production patterns. **The EU faces criticism (both internally and abroad) for its "double standards," allowing imported products to enter its market without adhering to the same environmental and sanitary standards required of domestic producers.**

To address these challenges, the global food system must become more sustainable and fair. The EU has committed to reforming its food system through initiatives like the Green Deal and the Farm to Fork Strategy. However, achieving these objectives also requires **the EU to reform its trade policy and align it with its environmental goals.**

We urge the EU to introduce mirror measures to ensure imported products meet essential EU standards, promoting fair competition and reducing environmental and social harm. These measures will ensure the reciprocity of standards in the European market, encouraging a shift towards agroecological practices and improving transparency and responsible consumption.

Mirror measures should be integrated into EU legislation and **make access to imported foodstuffs in EU markets conditional on compliance with European production standards,** regardless of their origin and regardless of the existence—or not—of a free-trade agreement with the trade partner. While some progress has been made in recent years, and a few concrete mirror measures have been implemented, much remains to be done for effective and efficient application of these existing measures.

Through sectoral analysis conducted in each of 6 Member States, we have illustrated the specific challenges faced in two major European agricultural sectors: soybeans and rapeseed trade, and beef and sheep meat markets. These case studies illustrate the EU's dependence on certain agricultural commodities imported from third countries and produced according to standards that are less stringent than those imposed on European farmers.

The lack of reciprocity in EU standards has tangible consequences for farmers, whether they are from the Global South or from Europe, not only by weakening the transition toward agroecology but also by not ensuring fair incomes for farmers, as illustrated by testimonies shared in this report. Mirror measures should therefore be designed in a way that does not disadvantage small producers and that, on the contrary, accompanies them towards better practices and promotes more sustainable land and resource use in the Global South.

Authors of this report have been calling for the adoption of a regulation on the mitigation of the imported environmental and health impacts from our food and the introduction of mirror measures on imports as part of a solution to these problems together with the adoption of legislation anchoring the principle of prohibition of exports to third countries of products not authorised on the EU market (e.g. pesticides banned in the EU). The new European mandate should lead to the implementation of mirror measures to align the EU's trade policy with its environmental objectives, as outlined in the recommendations and concrete actions in this report. By taking these steps, the EU can play a pivotal role in driving a more sustainable and equitable global food system.

UNLOCKING OUR FOOD SYSTEM TO ENHANCE SUSTAINABILITY

Intensive agriculture, which is the foundation of our industrial food system, is pushing us towards - and in some cases beyond - planetary boundaries, all while causing socio-economic disparities. It is responsible for around one-third of all greenhouse gas emissions (GHG) globally[1], leads to the depletion of biodiversity on land and at sea and drives rapid deforestation and environmental destruction, especially in the Global South.

The global food system is deeply intertwined with trade policies that shape the way agricultural products are produced, exchanged, and consumed across borders. The European Union (EU), as one of the largest global markets, plays a pivotal role in influencing global food trade through its consumption and production patterns.

This dominant industrial food system does not allow many producers to earn a decent

1 • Intergovernmental Panel on Climate Change (IPCC) Report, 2023

living from their work, as called out in early 2024, when farmers across the EU staged widespread protests. Expressing the need to change trade policies that unfairly disadvantaged them, many of the protestors highlighted the double standards that allow imported agricultural products—produced under different environmental, sanitary and labour standards—to enter the European market, undercutting local farmers who are required to meet the EU's rules. **These protests underscored the growing tension between the EU's sustainability goals and the economic realities faced by farmers, in EU and abroad.**

In response to these challenges, **it is critical to transform our global food and farming systems to make them more sustainable, fair, and financially rewarding.** The EU has committed to take action on this through the EU Green Deal, the Farm to Fork Strategy (F2F) and the roadmap for the future of EU food and farming[2]. On EU level, the reform of the Common Agricultural Policy is one of the main levers for achieving this. But EU trade policy also offers powerful tools to make our food system more sustainable while ensuring that smaller-scale producers in the Global South retain access to the EU market. "The adoption of import requirements" and the promotion of a "level playing field" have also been mentioned in the Strategic Dialogue report and in the Mission letter of the Commissioner-designate for agriculture. It is essential to ensure that such measures are implemented effectively to protect the environment and health, and fairly for small- and medium-sized producers globally.

Especially after the farmers' protests and the EU elections, double standards are a growing topic in EU agricultural, trade, and environmental policy discussions. In this phase, it will be crucial to ensure that there will be no populist capture of the topic of mirror measures and clauses, but that it will be treated within the framework of a transition towards more agroecological food systems in accordance with the EU's Green Deal objectives. In the absence of a suitable political response, such measures could instead be implemented counter to European environmental goals and in complete disconnect from them.

WHAT IS THE DOUBLE STANDARD IN TRADE BETWEEN EU AND NON-EU COUNTRIES?

Currently, there is a regulatory gap between imported and domestic products, due to the absence of reciprocity in many of the EU's environmental and health standards.

A number of European standards, particularly those relating to product safety, apply to all goods sold on the EU market, regardless of their origin. However, apart from a few exceptions, imported products are not subject to the European sanitary, environmental, and social production standards that European producers must comply with. A gap exists between European minimal standards and the standards for imported products from non-EU countries, especially in regard to the use of pesticides and farming practices with significant impacts on biodiversity and the health of people, especially in producing countries.This practice has sparked ethical concerns and calls for reform.

By importing products from countries that do not meet the EU's sustainability standards, the EU effectively externalises the environmental and social costs of its own consumption. This includes deforestation, biodiversity loss, land degradation in producing countries as well as impacts social consequences and public health issues, as an impact of hazardous pesticides use for instance. An example of such imports is soy for animal feed: to maintain the meat and dairy industry the EU outsources the environmental and health effects of its production system to third countries.

Moreover, not only are these trade dynam-

2 • President von der Leyen promised a "Vision for Agriculture and Food" to be released in the first 100 days of her mandat

ics questionable in terms of ethics and international sustainability goals, they can also appear as a smokescreen for EU consumers, due to the lack of transparency for the produce they consume. While they may be induced to think that because of the EU's high standards, what arrives on their plates is safe, this is not always true.

Transitioning to a more sustainable food and farming sector in Europe, can also have consequences in global supply chains, elevating better production and consumption standards globally.

The import of commodities which are subject to lower standards puts downward pressure on European market prices, which in turn puts farmers under pressure by creating unfair competition. **This situation is also a big obstacle to achieving a global transition toward agroecology and is weakening the economic situation of farmers.**

ADAPTING EU TRADE POLICY FOR A SUSTAINABLE FOOD SYSTEM

International trade can no longer be seen as an end in itself, with no regard to its adverse impacts on climate, biodiversity and human rights. With its market of almost 450 million consumers, the EU has a significant role to play to mitigate the adverse impacts of its own consumption in third countries. Action is urgently needed in the context of the accelerating ecological and climate crisis. Not only do current trade rules contribute to the development of an unsustainable economic model, but they also act as a brake on the ecological and social transition by reducing states' room for manoeuvre in many areas.

The EU's strength in agricultural export lies in high-value goods like wines, spirits, and dairy products, solidifying its image as a producer of premium produce. However, beneath this veneer lies a surprising reality: **the EU is a net importer of calories and proteins, relying on external sources to meet a significant portion (11% and 26% respectively) of its domestic consumption needs.** This dependence stems largely from massive imports of oilseeds, particularly soybeans.

While self-sufficiency remains elusive – especially for soybeans, rice, durum wheat, maize, rapeseed, and sunflower seeds – certain member states like Poland and Spain are making strides towards agricultural self-reliance, mitigating the EU overall import dependency. Despite this internal growth, the EU remains the world's third-largest importer of agri-food products, trailing only the US and China. This trend of import dependency is likely to continue, fuelled by ongoing negotiations and implementation of new free trade agreements. The EU already has the largest network of trade agreements in place, counting 46 agreements with 78 countries and it is also negotiating several dozen new agreements[3].

Trade Policies and Agreements Thwart Ambitions for more Sustainable Food Systems

The EU's agricultural trade practices face challenges in light of its environmental commitments. The Green Deal and international agreements, such as the Paris Agreement on climate and the Kunming-Montreal Global Biodiversity Framework, both champion environmental protection and sustainability.

The current paradigm of international trade fuels unsustainable economic growth by incentivizing the production and trade of environmentally destructive goods. Simultaneously, trade concessions made by governments limit their ability to act effectively in the face of environmental disaster. Over the past fifteen years, the EU has entered into numerous bilateral trade agreements granting additional trade preferences, known as preferential arrangements. **In 2022, 44% of the EU's trade was conducted under prefefential trade agreements[4]. These may involve the**

3 • Management Plan 2024, Directorate-General for Trade

4 • 2023 Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the implementation and enforcement of EU trade agreements

elimination or reduction of customs duties on certain products determined by tariff lines within the customs code. They also establish mechanisms for cooperation and dialogue aimed at mitigating the impact of national legislation (technical, sanitary, environmental...) on trade.

All past and current free trade agreements are by their very nature incompatible with the goals set out in the Green Deal as they encourage trade in all sectors regardless of their environmental and social impacts. For example, the draft agreement between the EU and the Mercosur bloc would encourage the entry into the European market of agricultural products that are not subject to the same production standards as European products. One case in point: currently 30% of pesticide active substances authorised in Brazil are strictly prohibited in the EU[5]. At the same time, the agreement will also encourage EU exports of EU-banned pesticides to Mercosur countries.

The EU's international trade commitments under the World Trade Organization (WTO) and bilateral trade agreements further complicate the issue. In the event of a complaint from a trade partner, the WTO's Dispute Settlement Body (or bilateral state-to-state dispute mechanisms) will review the measures implemented by the EU, ensuring their consistency and good-faith application. The EU will face significant challenges justifying import restrictions on agricultural products treated with these hazardous substances while still exporting them to non-EU countries.

Addressing these inconsistencies between domestic regulations and external trade practices is vital to ensure alignment with the EU's political commitments on environmentally friendly and sustainable trade practices. Only through such harmonisation can the EU truly fulfil its pledge to become a leader in responsible and sustainable agriculture.

5 • See Report of the UN Special Rapporteur on toxic substances and human rights, A/HRC/45/12/ Add.2, September 17, 2020, p. 7.

Reciprocity : the case for a pesticide export ban

EU environmental objectives raise questions about the long-term viability of the EU's current export-oriented model. One particularly contentious issue is the export of pesticides banned in the EU. **Despite recognizing the dangers these substances pose to human health and the environment within its borders, the EU currently permits their production and export to third countries** – often developing ones – lacking stringent regulatory frameworks.

France and Belgium have taken initial steps through national legislation to ban the export of these hazardous pesticides. This was also theoretically part of the coalition agreement of the German government in 2021. While these efforts are commendable, a unified EU-wide approach is necessary for true coherence.

The EU committed to ban the export of these hazardous pesticides in its 2020 Chemicals Strategy for Sustainability. To that end, the Commission launched a public consultation in 2023, but it backtracked under pressure from the industry, which fiercely opposed the adoption of such an export ban. However, new opportunities will arise. The revision of the Prior Informed Consent (PIC) regulation[6] presents another chance to tackle this controversy and the export ban on EU-banned pesticides has also been included in the roadmap for the future of EU food and farming in September 2024[7].

6 • PIC Legislation

7 • Main initiatives: Strategic Dialogue on the future of EU agriculture

MIRROR MEASURES: A FIRST STEP TOWARDS TRADE JUSTICE

Mirror measures aim to encourage reciprocity of production standards in trade and therefore mitigate certain forms of current distortions in competition that negatively impact European farmers.

Isolated examples of such measures have existed for a long time, mainly in the agricultural sector: in 1996, to protect European consumers and farmers, the EU banned imports from farms that used growth hormones. Since the launch of the Green Deal, the EU has adopted several mirror measures (for example the Regulation on Deforestation Free Products, and the regulation banning traces of two neonicotinoids – clothianidin and thiamethoxam – in imported products). However, a lot remains to be done for an effective and efficient application of existing measures. More broadly, there is still a lack of consideration of the **urgent need to act in a more systematic way on the remaining significant gaps in production standards between European and imported products.**

The new European lesgislative cycle that is starting should prioritise reforming EU trade policy in service of the ecological and social transition. Relocalisation of food systems through measures that support small and medium-scale farmers should be part of an overall shift of our agricultural trade policy. Therefore we need better policies on the one side to mitigate the distortion of competition against European farmers and support their transition towards agroecological food systems and on the other, to ensure that the European policies and FTAs do not have harmful consequences for the environment, the animals and the health of the people also in third countries, with special attention for the small-scale farmers in the Global South.

The difference between mirror measures and mirror clauses

Mirror measures and clauses are import requirements that are set up to end double standards and promote a level playing field among imported and domestic products. This represents the first aspect of reciprocity regarding imports.

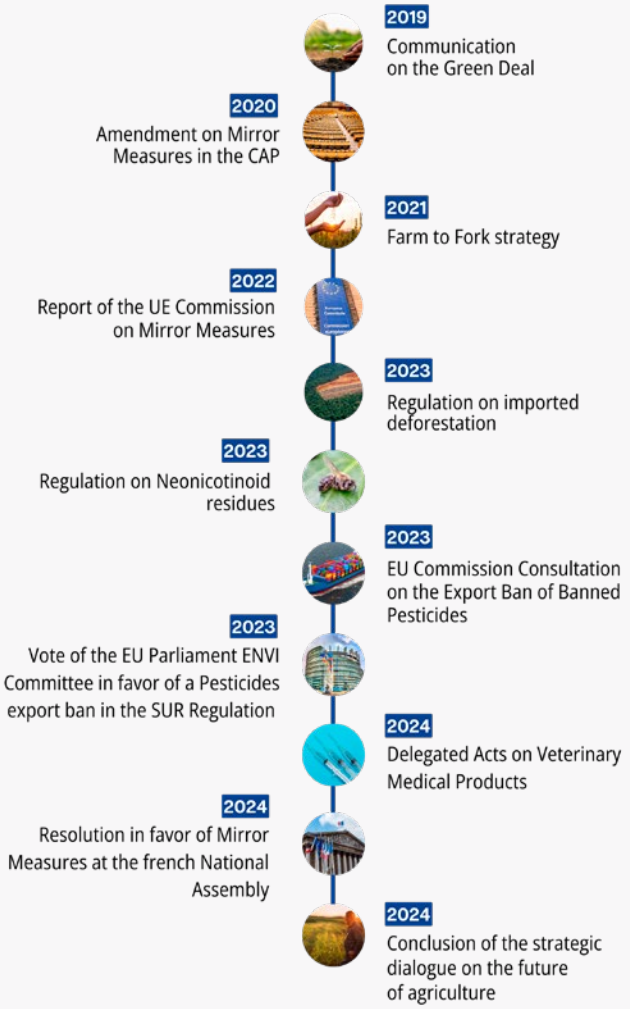
Mirror measures

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, regardless of their origin.** 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 with extraterritorial scope. The main objective of mirror measures is to align European agricultural, environmental and trade policies.

Mirror clauses

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.** While the EU claims to have put its trade policy at the service of sustainable development by including "trade and sustainable development" chapters in its bilateral agreements, these commitments and their implementation are largely inadequate, and of minimal scope and effectiveness. To start to better integrate sustainable development into trade policy, tariff preferences should at the very least be made conditional on compliance with sustainability standards and social criteria for environmentally, climatically, and human rights sensitive products.

Key steps on mirror measures



TAKEAWAYS FROM CASE STUDIES

Case studies conducted across six EU member states—Belgium, France, Germany, Italy, Netherlands, and Spain—offer an examination of the EU's dependence on some imported agricultural commodities and the resulting competitive, environmental and ethical imbalances due to differing environmental and sanitary standards. The studies focused on key agricultural sectors - apple, beef, rapeseed, rice, soybean and sheep - **revealing various inconsistencies between EU and non-EU production practices.** The dependence of the EU market on these goods is used to show the high impact of these double standards and the quantitative exposure to lower environmental and safety standards.

These findings highlight why the EU should implement mirror measures to address these discrepancies in its trade policies. While this paper delves into issues related to toxic substances and animal welfare, other critical factors such as workers' rights, biodiversity loss, as well as land and resource grabbing are acknowledged but not comprehensively explored.

Key issues that were identified:

- **Pesticides uses :**

Regarding pesticides, **the EU regulations for active substances are stricter compared to many trading partners.** A stark contrast emerges when considering the availability of pesticides, particularly highly hazardous pesticides (HHPs)[8], across different countries.

For example, most imported rapeseed and soybeans are cultivated with pesticides banned in the EU. For instance, substances like glufosinate or neonicotinoids are commonly used in countries outside the EU, even though they pose known risks to biodiversity, particularly to pollinators but also to water and soil. They are also a threat to human health, notably to the farm workers in direct contact with it. Farm workers in non-EU countries are therefore exposed to these substances. **Differences in standards do not stop at the use or prohibition of certain products; they also exist for certain practices.** While glyphosate's

8 • Highly Hazardous Pesticides are defined by the Food and Agriculture Organization and the World Health Organization as « pesticides that are acknowledged to present particularly high levels of acute or chronic hazards to health or environment according to internationally accepted classification systems such as WHO or Global Harmonized System (GHS) or their listing in relevant binding international agreements or conventions. In addition, pesticides that appear to cause severe or irreversible harm to health or the environment under conditions of use in a country may be considered to be and treated as highly hazardous» (See FAO and WHO 2013; FAO and WHO 2016)

uses are restricted in the EU, it's widely used in Canada, especially for pre-harvest desiccation leading to higher residue level in the crops. This discrepancy extends beyond the application methods, with practices like plane dispersal often more prevalent outside the EU.

Although the EU enforces Maximum Residue Limits (MRLs) to regulate pesticide residues in food products, this system has notable shortcomings. **Products treated with pesticides banned in the EU can still be imported if they meet these residue thresholds,** and the absence of detectable residues does not necessarily indicate pesticide-free cultivation. The MRL system has been criticised as insufficient in addressing the long-term environmental and health impacts of these substances, as it overlooks the cumulative and systemic nature of pesticide exposure in ecosystems. Moreover, MRL rules do not apply to all imported agricultural commodities, particularly those exclusively intended for animal feed, energetical or ornamental uses, such as flowers. Also, for some specific commodities, tolerances on higher MRL are also set in order to avoid blocking imports from third countries.

- **Genetically Modified Organisms (GMOs) and Herbicide Resistance:**

While the EU follows the precautionary principle in regulating GM-crops, **the single market still imports a substantial volume of products that are genetically modified,** notably some that are resistant to herbicides. The cultivation of these GMOs allows for more aggressive use of herbicides, many of which are banned or highly restricted within the EU. Yet we continue their import, causing an uneven playing field with the EU's local production, other than entry of scientifically proven harmful substances with higher residues.

- **Traceability and animal health and welfare:**

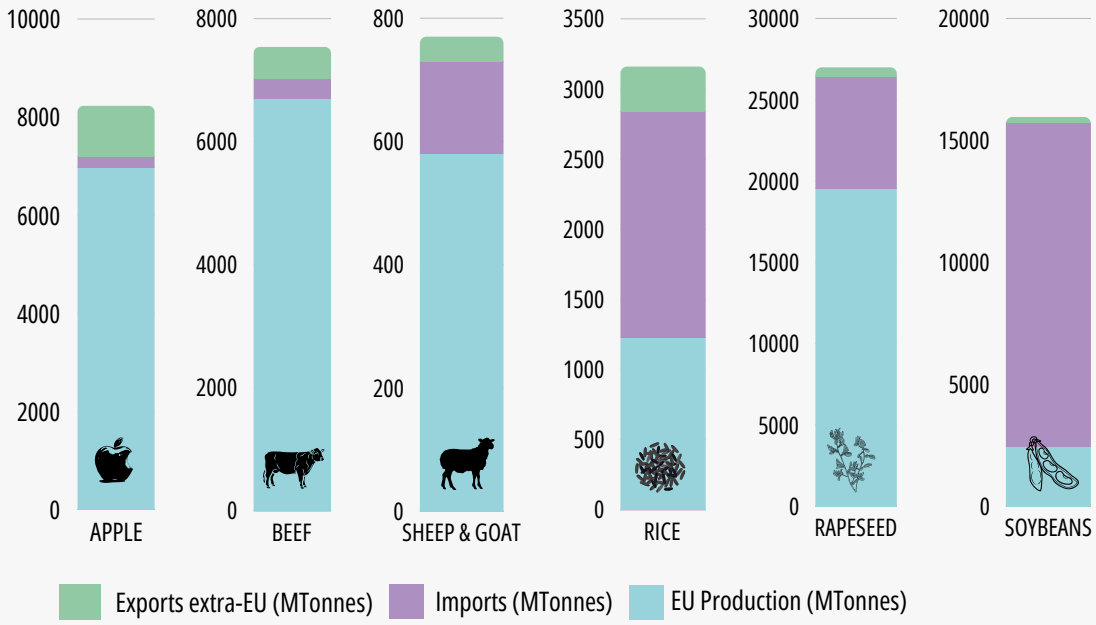
The case studies on the meat market, particularly for beef and sheep, revealed critical differences with the EU and its trading partners. In some third countries (like Brazil, Australia and Canada), the high use of antibiotics as growth promoters - a practice banned in the EU - and poor animal welfare practices, such as inadequate transport conditions, are still prevalent. **The lack of traceability systems added to less strict regulations in these countries allows them to produce meat at lower costs** even if it causes public health concerns. For instance, the overuse of antibiotics in livestock farming has contributed to the global rise of antimicrobial resistance. Apart from putting food safety at risk, these practices are also against EU citizens' will to support higher animal protection in farming.

To look deeper into the trade dynamics and particular issues related to the products, refer to the case studies in the sections below.

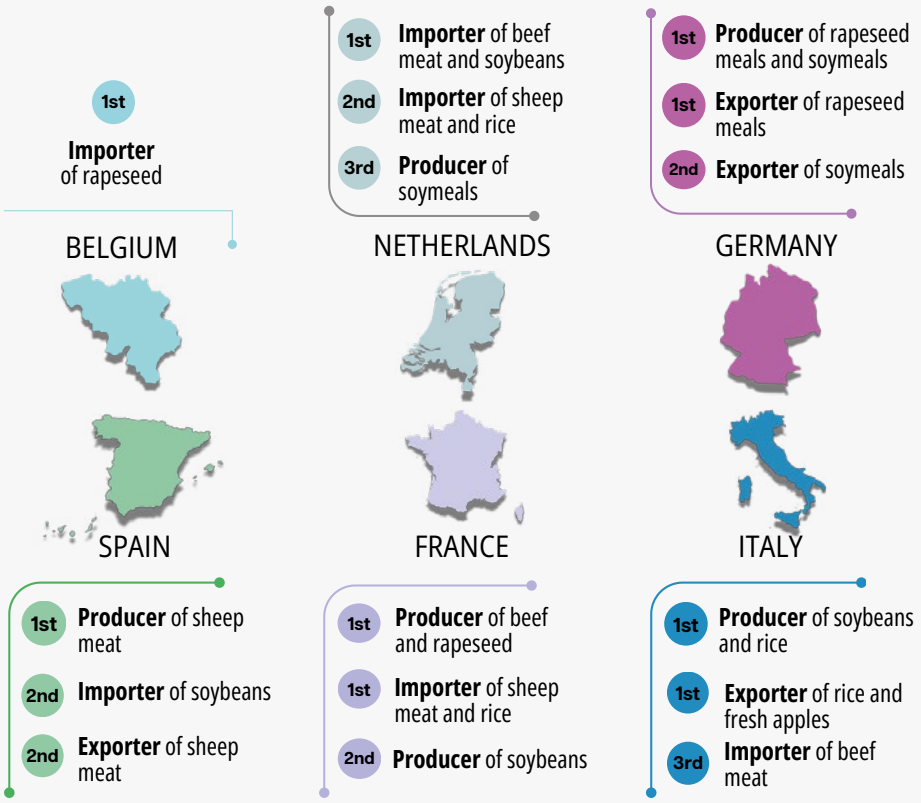
KEY FIGURES OF THE REPORT

Sources : EUStats, Fedoil, JRC. - Reference years 2022-23

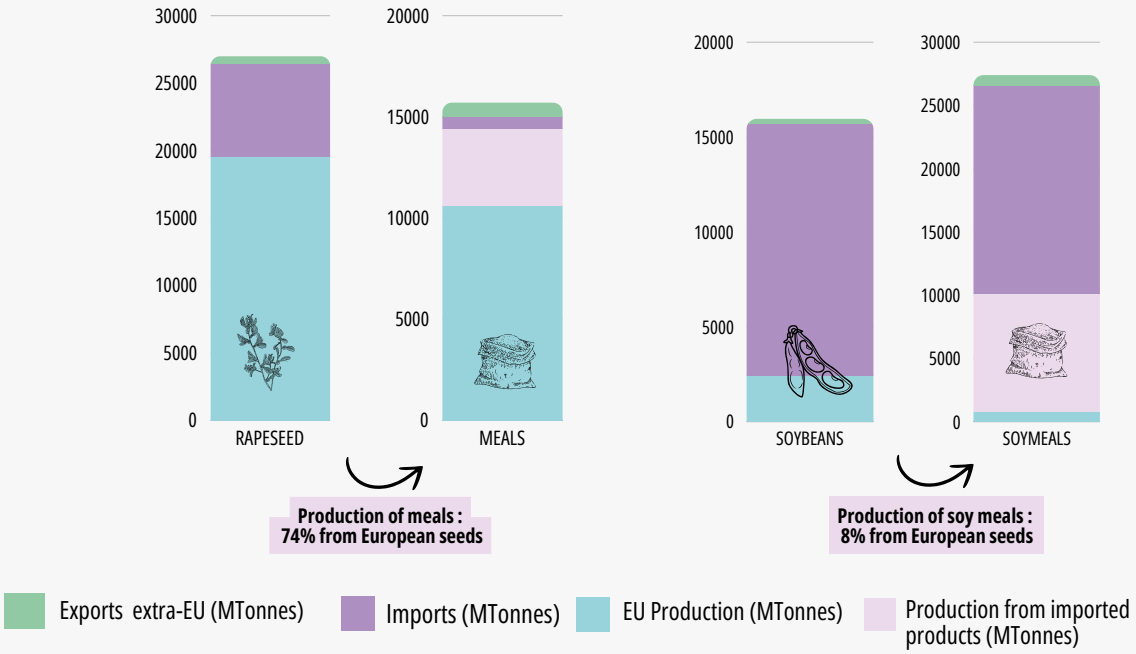
Size of the EU market (in volume)



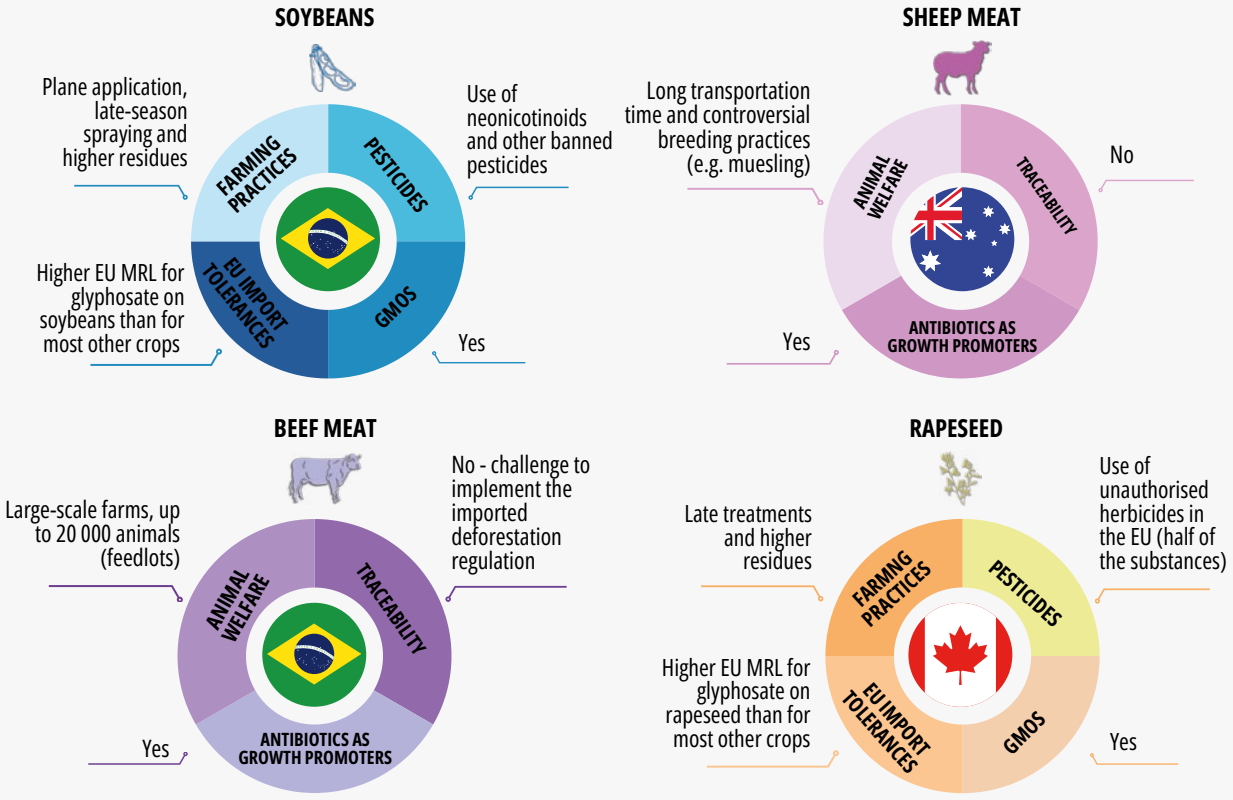
Extra-EU trade features of the 6 member states (in volume)



Focus on rapeseed, soybeans and meals flows



Examples of divergent practices with key EU partners



POLITICAL RECOMMENDATIONS

During the 2019-2024 mandate, the EU began addressing the environmental impacts of its consumption in third countries with the adoption in 2023 of the Carbon Border Adjustment Mechanism (Regulation (EU) 2023/956), the Regulation on deforestation-free products (Regulation (EU) 2023/1115), and the Regulation on residues of two neonicotinoids (Regulation (EC) 2023/334).

It must now apply those regulations without delay, close the loopholes they contain and continue to reform its trade policy and tackle regulatory divergence. **In future, decision makers should systematically consider including provisions on the treatment of imported and exported goods** in all landmark EU legislation. This will be necessary, in particular, for the success of the Green Deal and its acceptance by businesses and farmers.

Our organisations call for a concrete working plan on implementing mirror measures. For that purpose, we propose a method combined with concrete measures that should be implemented within the coming months.

For policy design :

- **Inscribe the adoption and implementation of effective mirror measures in the priorities of the EU** institutions for the next EU cycle and in the portfolio of future relevant commissioners.
- Generalise the principle of mirror measures by adopting a **European Regulation on mitigation of environmental and health impacts associated with food traded by the EU.**
- **Adopt a mirror measures reflex:** systematically consider including provisions on the treatment of imported and exported goods in all landmark EU legislation, at every stage, particularly in impact studies, consultations or when drafting legislative proposals.
- Ensure that the design and implementation of mirror measures **do not burden vulnerable countries and producers in international value chains.** The EU should:
  - *Assess the costs and requirements of compliance with EU rules for countries with significant volumes of smallholder production destined for the EU market.*
  - *Analyse the value distribution in these chains and the scope for increasing production standards and remuneration for producers.*
  - *Ensure smallholder farmers receive adequate technical and financial support to comply with the new European rules.*
  - *Take concrete steps to ensure that these farmers are guaranteed a decent income, for example by including the issue of decent income and purchasing practices in trade agreements, or in the national implementation of the EU Corporate Sustainability Due Diligence Directive.*
- **Strengthen the resources and capabilities of customs, veterinary, and phytosanitary authorities** regarding all these new import requirements and develop customs nomenclature to differentiate products according to their production methods, for example organically-farmed products.
- **Oppose trade agreements that do not meet core environmental, social, human rights and animal welfare standards** and encourage the exchange of products harmful to the environment, climate, and health.
- **Promote the definition of more ambitious international standards on these issues,** in particular by including the objective of environmental protection in the mandate of the Codex Alimentarius.

For policy :

- As a first step, automatically lower the Maximum Residue Limits to the limit of detection for all substances banned in the EU. **Products containing traces of pesticides banned in the EU should not be allowed to enter the European market.** This approach of automatically lowering MRLs should be extended to all agricultural production - in particular to crops intended exclusively for animal feed, energy or ornamental use - which is not the case today. Regulation EC 396/ 2005 on MRLs should be amended or a specific new regulation should be adopted to cover pesticides banned for environmental reasons.
- In a second phase, go one step further and **adopt a total ban on imports of products treated with banned pesticides in the EU.** First, the ban should focus on the most hazardous pesticides. The criteria used could include classification into a certain category and the severity of impacts generated by EU consumption based on sectors according to import volumes and quantities of substances used. Then, the ban could apply to all banned pesticides within the EU.
- **End import tolerances for all EU banned pesticides.** Put an end to the granting of emergency derogations allowing the use of substances banned in the EU.
- **Ban the export of pesticides and substances prohibited** for use within the EU to third countries.
- Implement the ban on the **importation of meat from animals that have been**

treated with or fed on substances banned in the EU (growth-promoting antibiotics, animal meal).

- **Implement the objective of "zero products from imported deforestation"** by strengthening the Regulation on deforestation-free products concerning the covered areas (including wooded lands in order to protect peatlands and forested savannahs) and products (such as sugar cane, maize, cotton...).
- **Require adherence to standards equivalent to those in force in the EU for animal agriculture in third countries,** particularly regarding breeding conditions, transport, and traceability.

CONCLUSIONS AND NEXT STEPS

Mirror measures are key tools to better align trade policy with the environmental objectives of the European Union. Their implementation is possible - and necessary. The European Commission acknowledges that it is politically preferable and legally possible for the EU to take *"autonomous measures concerning the environmental or ethical aspects of the import products' processes and production methods [or which] take into account (...) the requirements of European consumers, who are increasingly aware of the environmental, health, social and ethical dimensions of food production"*[9]. Since the launch of the Green Deal, a paradigm shift has been under way, with the adoption of the Carbon Border Adjustment Mechanism, the regulation on imported deforestation and the regulation on residues of two neonicotinoids. However, a lot remains to be done **and the new European mandate should be that of a concrete realisation of mirror measures.**

Added to this need is the urgency of preserving the progress made in recent years and implementing the announcements of the Green Deal, **while several environmental texts are currently being weakened or even abandoned.**

But how can we imagine achieving European environmental and socio-economic objectives without rethinking the European Union's trade strategy? It appears clear that the gap between European production standards and those of third countries threatens the sustainability of the transformations implemented by European farmers to initiate the shift towards agroecological transition. The differences in production standards also contribute to the loss of EU consumers' trust. **And it also weakens the integrity of European standards and risks hindering their necessary strengthening.** The reciprocity of standards, through the implementation of mirror measures, is therefore one of the solutions to be promoted.

This priority is now affirmed in the conclusions of the Strategic Dialogue on Agriculture[10]:

► *"The overall ambition should be to create a stronger alignment of imports with EU food and farming standards."*

► *"This means the adoption (...) of import requirements in EU law (...) to benefit EU farmers, workers, businesses, citizens, sustainability, and animal welfare, and to preserve the EU's safe and high-quality production standards for all agricultural products."*

► *"This includes an EU leadership by ending practice of unethical double standards. For example, Member States should stop exports of within the EU banned hazardous pesticides to countries with less stringent regulations."*

9 • See Report from the commission to the European Parliament and the Council "Application of EU health and environmental standards to imported agricultural and agri-food products", COM (2022) 226 final, June 3rd, 2022, p. 21

10 • Strategic Dialogueon the Future of EU Agriculture

IMPACTS ON EU FARMERS AND NON-EU COUNTRIES

VOICES FROM EU FARMERS

The lack of reciprocity in EU standards has tangible consequences for European farmers, not only in terms of competitiveness but also in facilitating the transition to agroecology and ensuring fair incomes for farmers. Earlier this year, farmers staged protests to demand more equitable rules on the European market, particularly concerning imported products from third countries with less stringent standards.

The political response to these demands primarily focused on weakening regulations rather than addressing the competitiveness distortion and income inequality issues. However, **European farmers do not solely attribute their problems to European environmental standards:**

► *"In France and Europe, we were close to self-sufficiency in rapeseed, but for several years, imports of rapeseed from Canada or Australia have undermined this self-sufficiency. The problem is not, as one might hear, European environmental standards that protect biodiversity and the environment. We need biodiversity to produce. The problem is that these imports, with less stringent standards, undermine our competitiveness."* ***Jean-Bernard Lozier, rapeseed producer***

The increasing globalisation of European agriculture has had significant consequences for certain sectors. For example, the animal feed sector has steadily increased imports from third countries due to economic factors, disregarding the environmental impacts as well as the potential risks to food system resilience and food sovereignty:

► *"In France, 90% of soybeans are imported to feed livestock, mainly from North and South America. It's cheaper, but its health and environmental impacts are enormous. Why accept this GMO soy, sourced from deforested areas and treated with pesticides banned in the EU? This is a major obstacle that prevents the development of European supply chains with more sustainable practices, which would strengthen our resilience and food sovereignty."* ***Christophe Garroussia, soybean producer***

A notable aspect of imports and traceability is that the origin of food is often difficult to ascertain. However, consumer attitudes could significantly shift if this information were readily available. Furthermore, while perceptions may vary, many European citizens are unaware of the disparities in farming practices between the EU and its trading partners. Greater transparency could potentially stimulate a consumer-driven transition to agroecology, a sentiment echoed by European farmers themselves :

► *"Due to international agreements, it's possible to import beef from farms with much more intensive practices than ours. And when people go shopping, they don't even know it's possible, and on top of that, the information isn't easily accessible. This lack of transparency undermines our sectors and is putting us in a situation of unfair competition."* ***Claire Juillet, beef producer***

Finally, the disparity between EU standards and those of third countries raises questions about the public interest. According to the EU itself, approximately 84% of EU citizens believe that farmed animals should be better protected, particularly regarding transportation[11]. European small-scale farmers are grappling with the dual challenge of increased production costs associated with traditional farming systems and animal welfare standards. This situation is fostering a sense of unfairness and directly impacting already vulnerable farmers:

► *"Meat from Australia or New Zealand, sometimes previously frozen and travelling over 15,000 km, comes from lambs that have travelled in deplorable conditions. The farms here are generally smaller and the rules for traceability and animal transport are stricter, for reasons of health and animal protection. This implies higher production costs while imported meat does not follow the same rules. It's unfair."* ***Thomas Martin, sheep producer***

Furthermore, the absence of mirror measures not only affects European farmers and agriculture. Indeed, farmers in the Global South, particularly small-scale farmers, are also adversely impacted by the EU's failure to consider the repercussions of its imports on producing countries.

11 • Attitudes of Europeans towards animal welfare

Estimation of the economic distortion related to certain regulatory divergences

The disparity in standards imposed on European producers compared to those in third countries can lead to distortions in competition. In case studies conducted in France, in collaboration with professional organisations, estimates were made regarding specific environmental and health regulatory divergences. The approach presented here seeks to simplify and isolate the cost associated with higher production standards due to more stringent regulations. The aim is not to compare all production costs (such as labor or structural expenses, for example). In fact, such a comparison across different agricultural systems is based on numerous factors, including socio-economic contexts and sometimes highly diverse soil and climate conditions. Nonetheless, some examples have been used to illustrate the overall difference in competitiveness between countries.

Based on 2023 data, weed control costs were estimated for conventional (non-GMO) soy and herbicide-resistant GMO soy, and the difference was compared to the production costs of French soy. Experts estimate that this single divergence in weed control practices represents an environmental competition distortion amounting to between 5 to 9% of production costs.

The precise calculation of the additional costs related to the implementation of regulations within the EU in the beef sector is even more challenging. Studies have been conducted in the past on this subject by the European Commission (DG Agri)[12] and the French Livestock Institute[13], in which the total additional cost linked to compliance with certain regulations, which apply only to EU production, was estimated at between 3 and 8% of the production cost.

12 • Assessing farmers' cost of compliance with EU legislation in the fields of environment, animal welfare and food safety, European Commission. 2011-2014

13 • Coûts des contraintes réglementaires européennes. Idele. DEE N°307. Novembre 2001

VOICES FROM THE GLOBAL SOUTH

Maintaining the status quo in terms of double standards has severe negative impacts both on the people and the environment in the Global South. The exploitation of natural resources and land in third countries as well as the contamination of people, species, and the environment through EU-banned pesticides threaten food sovereignty and food security and further perpetuates inequalities between the North and the Global South. In the end, not only the detrimental impacts of the industrial food system including climate change, biodiversity loss, and health impacts on people's lives and the environment are externalised to the producing countries, but also felt worldwide as shown by the consequences of pollinator decline and climate change.

► ***John Kariuki, a farmer from Kenya voiced a growing concern about this "pesticide dumping" :*** *"Kenya is experiencing increasing societal concerns (88% of population according to a study[14]) around the impact of pesticide use on human health and on the environment. The country has witnessed continued economic incentives for monoculture agribusinesses and excessive use of agrochemicals. Dumping of agrochemicals in Kenya has continued due to weak regulations that allow export of toxic weed killers and other pesticides that are banned on the European continent."*

14 • Bollmohr, Dr. Silke. Toxic Business - Highly hazardous pesticides in Kenya. Route To Food Initiative. Nairobi. Heinrich Böll Stiftung, September 2023, p.31.

The lack of equal standards for the export of pesticides as well as for the import of foodstuffs raises several health concerns, for instance with pesticide and environmental poisonings, but also social concerns, including about extensive land use and land grabbing, especially of indigenous peoples.

► ***According to research conducted by Professor Larissa Bombardi,*** *"Brazil is the biggest exporter of soybeans, beef, chicken and sugarcane worldwide, besides being the second largest exporter of grains in the world. This role in the global market as exporter of commodities and biofuels also led to deforestation, biodiversity destruction, violation of Indigenous rights – and also an increase in pesticide use"*[15].

Deforestation has very negative climate impacts and the very dramatic effect of biodiversity loss – both factors threaten life on earth for us as humans in the long run. We will all witness the extent of this damage in the coming years – **and the consequences will not only be felt in the Global South, but worldwide.** This is also true for the consequences of biodiversity loss and the decline of pollinators, fuelled by the use of banned pesticides in Europe but still exported to third countries. Without pollinators, food production will become increasingly difficult and expensive.

The extensive use of land the EU makes in third countries, especially for animal feed, entails that local communities in producing countries are suffering food security because they have less land to grow their own staple foods and meet their dietary needs through their preferred foods.

► ***Edward Mukiibi, an agronomist from Uganda***[16] *can attest to the crimes countries in the Global South are being confronted with: "On the African continent, we are suffering unexpected droughts, rampant land grabs from foreign*

investments fuelling internal conflicts and food insecurity in many communities. Industrial food production, largely practised in the Global North, is based on highly extractive activities in the Global South and fuels the climate crisis through heavy pesticide use, large monocultures, huge factory farms. The highly subsidised industrial livestock farms in western countries and Asia not only lead to a climate crisis but also dumping of unhealthy livestock products in Africa through bilateral trade policies, destroying the local production systems, throwing local farms out of production and greatly undermining the food sovereignty efforts of these countries. The action we take in one part of the world greatly affects people in another part of the world, which is why we ask the European Union and other investors to make sure their actions in third countries are based on sustainable investments."

By making our food systems in Europe more sustainable, we take responsibility within the global food chains and make sure that the external impacts of the food system do not get passed on to third countries.

Securing life on earth and food production means that we inevitably need to reassess the way we use resources and especially to change the way we produce food. If the EU Green Deal and the UN Sustainable Development Goals set out to make food systems more sustainable, it means that the **European Union has the responsibility to look at the entire food production chain,** including the one of imported products.

15 • Larissa Bombardi, Brazil: more cultivation, more pesticides, more exports, Pesticide Atlas 2022, Heinrich Böll Stiftung

16 • Edward Mukiibi is also the President of Slow Food International

The detrimental consequences of mass soy production in Latin America, for instance, showcases why it is imperative for the EU to shift away from industrial livestock farming systems that largely 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 incentivise more sustainable land and resource use in the Global South, the EU would be actively internalising responsibility for the externalised costs of this industrial system that we currently oblige third countries to pay.

IMPACTS OF MIRROR MEASURES IN THE GLOBAL SOUTH

In the absence of ambitious international standards, mirror measures are useful tools, provided they are implemented under several essential conditions. They must be based on internationally recognized health, environmental, and human rights objectives in order to comply with international law. Furthermore, they should be designed in a way that does not disadvantage small producers.

Some recently adopted regulations, such as Regulation EC 2023/1115 on commodities associated with deforestation (EUDR)[17], still require improvements and accompanying measures to meet these criteria. The EUDR mandates that farmers geolocate their plots and establish a traceability system to ensure that the production does not originate from deforested areas.

The expected impacts greatly vary depending on the sectors involved. For example, in the case of livestock products, the main exporting countries are developed countries (United Kingdom, New Zealand…) or middle-income countries (Brazil, Argentina…), and the exporters targeting the EU market are primarily large-scale producers tied with multinational companies[18].

In contrast, in the coffee and cacao sectors, small-scale farmers represent 70-90% and more that 90% of the producers respectively, putting these sectors in jeopardy of the new EU standards.

The implementation of the geolocation requirement leads to costs related to the necessary equipment and the risk of private actors profiting from the production and management of this data at the expense of producers. These consequences can be partially mitigated by the establishment of national traceability systems or by ensuring their compliance with European regulation requirements, as is being done in Ghana and Côte d'Ivoire. **EU regulators must also pay attention that chosen criteria are in line with existing national systems** in order to avoid duplication of costs and administrative duties for producers[19].

Ultimately, **the burden of the implementation of mirror measures should not be supported by low- or middle-income exporting countries** and small-scale farmers because they are precisely the most vulnerable players within international value chains facing dire income issues. This implies they cannot take in charge additional costs to adapt to European regulations. Therefore, it is critical to financially support farmers in the Global South process, to set up a differentiation system in favour of small-scale producers from the Global South, and to accompany transition towards agro-ecological food systems by guiding the adoption of higher standards in order to keep them accessing the EU market.

17 • The implementation of the EUDR was finally delayed by 12 months in October 2024.

18 • Eurogroup for animals, "Stop cruel imports! Applying EU animal welfare standards to all products placed on the EU market", Sept. 2023.

19 • Fern et al., "Including smallholders in EU action to protect and restore the world's forests", Briefing paper, 2021.

CASE STUDIES

Several case studies were conducted in different EU countries as part of this research to illustrate the EU's dependence on certain agricultural commodities imported from third countries and produced according to standards that are less stringent than those imposed on European farmers. These case studies show how EU consumption patterns are dependent on this internationalised low-cost intensive agriculture model.

These products have been identified based on different criteria:

- The existence of **significant production within the EU;**
- **Substantial import flows** from third countries;
- A trend of increasing imports, particularly due to the **existence of free trade agreements already ratified or under negotiation;**
- **Environmental and/or societal distortions of competition** linked to differences in production standards between the EU and importing third countries.

These case studies illustrate different issues associated with environmental competition distortions, including the use of banned pesticides and antibiotics, practises harmful to

animal welfare, and other practices prohibited within the EU because of their impact on biodiversity, health and the environment.

This analysis has been conducted in 6 European countries, on the following commodities:

Cases studies conducted in 6 EU member states

Countries	Commodities
Belgium	Apple, beef, rapeseed.
France	Beef, hazelnut, rice, sheep and soybean.
Germany	Apple, beef and soybean.
Italy	Beef, rice and soybean.
Netherlands	Beef, rapeseed and soybean.
Spain	Beef, lentils, rice and sheep.

THE EU'S LEVEL OF DEPENDENCE ON THESE IMPORTS

EU agricultural production varies significantly across products, with varying levels of self-sufficiency and trade dependence.

The self-sufficiency rate, calculated as the ratio of production to consumption, provides a valuable metric for this analysis.

$$\text{SELF-SUFFICIENCY RATE} = \frac{\text{Production}}{\text{Apparent Consumption (production + imports − exports)}} \times 100$$

For commodities like soybeans, rice, and hazelnuts, where domestic production is limited, the EU maintains a strong reliance on imports. Conversely, sectors such as beef have traditionally exhibited self-sufficiency. However, even in self-sufficient sectors, imports can play a role, particularly for specific product categories like high-value beef cuts.

The EU's trade relationships and the dynamics of global agricultural markets influence import patterns. While new trade agreements can increase import volumes, declining domestic production also contributes to growing import dependency. Furthermore, self-sufficiency levels diverge among EU member states, highlighting regional disparities within the EU.

This complexity underscores the challenges and opportunities facing the bloc in ensuring food security, competitiveness, as well as a global and fair agroecological transition.

European flows for 6 commodities - *Source : Eurostat 2022 and EU feed protein balance sheets*

* own calculation / ** calculation made on seeds crushing from EU domestic production

Products	Apple (fresh)	Beef	Rapeseed	Rice	Sheep and goat	Soy
EU Self Sufficiency	109 %	103 % *	100 % (seeds) 74 % ** (meals)	49 % *	84 % *	16 % (beans) 3 % ** (meals)
EU Production (Mt)	7 000	6 700	19 600 (seeds) 10 600 ** (meals)	1 200	580	2 400 (beans) 800 ** (meals)
EU Imports (Mt)	200	300	6 800 (seeds) 600 (meals)	1 600	150	13 300 (beans) 16 500 (meals)
EU Exports (Mt)	1 000	500	500 (seeds) 700 (meals)	300	40	200 (beans) 800 (meals)
EU Top 3 producers	Poland Italy France	France Germany Spain	France Germany Poland	Italy Spain Greece	Spain Romania France	Italy France Austria
EU Top 3 importers	Netherlands Ireland Bulgaria	Netherlands France Italy	Belgium France Germany	France Netherlands Spain	France Netherlands Germany	Netherlands Spain Germany
EU Top 3 trade partners (imports)	Chile New-Zealand South Africa	United Kingdom Brazil Argentina	Australia Ukraine Uruguay	Myanmar Pakistan Cambodia	United Kingdom New-Zealand Australia	Brazil United States Ukraine

A comparative analysis of EU and non-EU products reveals significant disparities in production standards. While this paper delves into issues related to toxic substances and animal welfare, other critical factors such as workers' rights, biodiversity loss, as well as land and resource grabbing are acknowledged but not comprehensively explored.

DIVERGENT RULES ON PESTICIDES

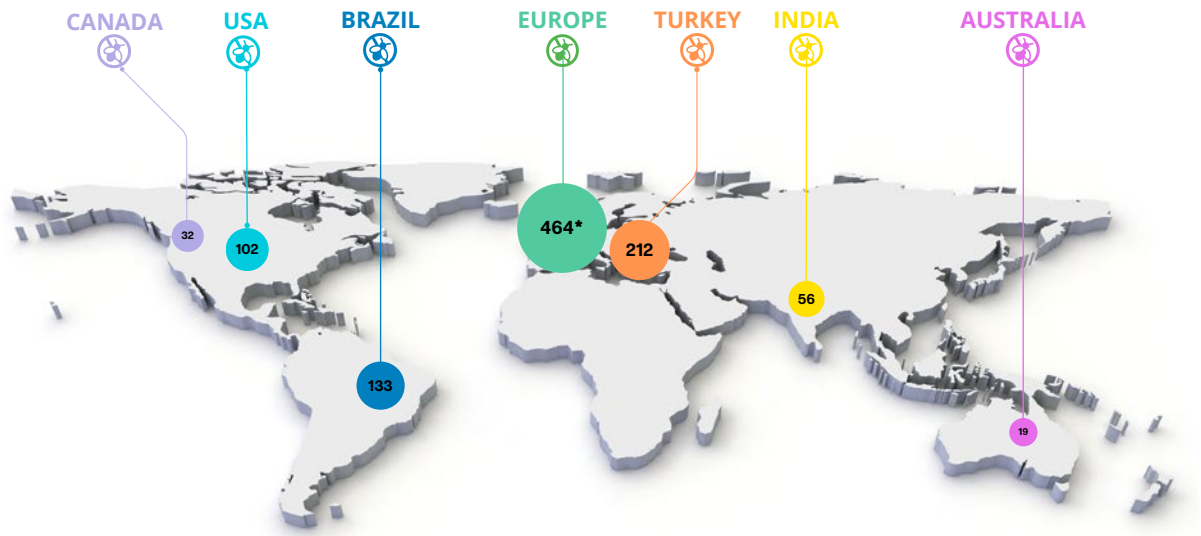
Regarding pesticides, and their active substances, **the EU's application of the precautionary principle results in stricter regulations for active substances** compared to many trading partners.

A stark contrast emerges when considering the availability of pesticides, particularly highly hazardous pesticides (HHPs)[20], across different countries. An analysis of the Pesticides Action Network's banned pesticide list (May 2022) highlights significant regulatory disparities among studied exporting countries.

The EU and Turkey to a lesser extent, for instance, have implemented strict regulations regarding plant protection active substances, leading to the ban of numerous pesticides, including many Highly Hazardous Pesticides (HHPs). While the United States and Canada or Australia for example have also banned some substances, their regulations appear less stringent than those of the EU.

In some cases, such as with the substance Lindane, **a global ban has been enacted in accordance with the Stockholm Convention on Persistent Organic Pollutants.** It is not the case with a lot of Highly Hazardous pesticides like the insecticides neonicotinoids and fipronil for example. Indeed, the EU and Turkey banned it due to their negative impact on biodiversity, especially on pollinators, but it remains widely used in many countries.

*Number of banned pesticides per trade partner compared to EU (Source : PAN Europe, 2022) / * : for EU, 269 substances are unapproved and 195 are banned.*



20 • Highly Hazardous Pesticides are defined by the Food and Agriculture Organization and the World Health Organization as « pesticides that are acknowledged to present particularly high levels of acute or chronic hazards to health or environment according to internationally accepted classification systems such as WHO or Global Harmonized System (GHS) or their listing in relevant binding international agreements or conventions. In addition, pesticides that appear to cause severe or irreversible harm to health or the environment under conditions of use in a country may be considered to be and treated as highly hazardous» (See FAO and WHO 2013; FAO and WHO 2016)

Impact of pesticides

The risk of pesticide poisoning is particularly severe for the people who experience direct exposure in the countries of production where they are known to cause diseases. Recent literature acknowledges that citizen vulnerability to the harmful effects of agricultural chemicals is not limited to farm workers who are in direct contact. **Globally, tens of millions of people suffer from unintended pesticide poisoning each year, the majority of them in the Global South[21].**

In fact, the use of highly hazardous pesticides and other toxic substances does not only threaten human life, but also other species and natural resources, such as water and soil. Many toxic substances banned in the EU are permitted in producing third countries that greatly endanger the biodiversity in land and aquatic ecosystems. It not only concerns the use of certain substances themselves but also the way they are applied to crops, some of which have higher environmental implications.

Neonicotinoids are Dangerous for Bees and Thereby Challenge Food Security
The collapse of biodiversity, particularly pollinator populations, poses a global threat of immense consequence. As 75% of crop types rely on pollination, the loss of pollinators directly impacts food security. Without effective pollination, food production will face significant challenges.

While banning harmful pesticides in Europe, especially neonicotinoids, is crucial to protect European bees, it is insufficient to safeguard global food security and biodiversity. The EU's continued import of agricultural products heavily reliant on these insecticides creates a stark contradiction.

This practice undermines global environmental efforts, especially considering the EU's role in synthesising and exporting these harmful substances. In February 2023, the EU adopted a regulation banning, by 2026, the import of products containing traces of two neonicotinoids prohibited in the EU, thiamethoxam and clothianidin, due to their toxicity on pollinators.

But this measure only concerns 2 neonicotinoids banned in the EU. In addition, a more ambitious approach could have been more effective in protecting the environment. Indeed, environmental protection implies banning not just residues, but the entire use of these substances during the production of these agricultural goods, whether intended for food, feed or energy use (cf. infra, the next section on MRLs).

21 • Globally, the WHO estimated in 1990 that around 25 million cases of pesticide poisoning occurred each year, including 220 000 deaths, primarily in developing countries. see J. Jeyaratnam, Acute pesticide poisoning: a major global health problem, Global Health Statistical Quarterly Report, 1990.
Another study estimated that 385 million people could suffer from unintended pesticide poisoning (UAPP) each year, with 95% of cases occurring in the Global South. This estimate was derived by extrapolating the results of a review of scientific literature published between 2006 and 2018 (157 publications covering 58 countries and reporting approximately 740,000 annual cases, including 7,500 deaths), supplemented by mortality data from the WHO. Boedeker W., et al., 2020. «The global distribution of acute unintentional pesticide poisoning: estimations based on a systematic review», BMC Public Health.

Problems with the Maximum Residue Limits (MRLs) approach for Pesticides

The EU maintains stringent regulations on pesticide residues in agricultural products, often going further than global standards set by the Codex Alimentarius[22]. While this ensures a high level of consumer and environmental protection within the EU, it also creates significant disparities between domestic and imported products.

In accordance with EU pesticides regulations[23], **products treated with pesticides banned in the EU can still enter the European market** if residue levels comply with EU maximum residues limits (MRL). This raises concerns about the effectiveness of the EU's regulatory framework in protecting consumer health and the environment. Moreover, it may create an uneven playing field between European and third-country producers.

Furthermore, the EU's reliance on MRLs as a primary control measure has limitations. **The absence of detectable residues does not necessarily indicate pesticide-free cultivation.**

The MRL approach is also unsuitable for commodities such as hazelnuts, due to the fruit's protection by the shell and leaf bracts. As a result, it is possible to apply numerous products at high doses and late stages without detecting residues in the hazelnuts, except for highly systemic products.

Additionally, the scope of MRL regulation is restricted to food and partially to feed, excluding other agricultural products (plants for ornamental or energetic use for instance).

The system for granting import tolerances further complicates the regulatory landscape. **The EU allows for an increase in MRLs in certain cases to facilitate the entry of products treated with banned substances** imported from third countries. These tolerances granted by the EU to third countries and industries also aim to maintain its own unsustainable practices, such as intensive livestock farming.

Effective monitoring and enforcement of pesticide regulations are crucial to protect health and environment and ensure fair competition. However, the current system, with its limitations and loopholes, requires substantial improvement.

Genetically Modified Organisms (GMOs) and associated pesticide use

The EU's stance on genetically modified organisms (GMOs) contrasts sharply with that of many other countries. While only one GM crop (one corn variety) is currently cultivated within the EU, GMOs' cultivation is widely permitted and adopted elsewhere, for soybeans notably in countries like Brazil or USA.

European MRLs for certain herbicides, like glufosinate or glyphosate, are notably higher for some crops where GMOs are widely cultivated in third countries. The continuation of imports from European trading partners, despite the increased use of pesticides on these GMO crops, is one of the reasons for resorting to import tolerances.

This situation underscores the challenges of ensuring food safety and environmental protection in the context of global trade, where regulatory disparities can create uneven competitive conditions.

22 • Collection of internationally adopted food standards, guidelines and codes of practice adopted by the Codex Alimentarius Commission. The Commission was established in 1963 by FAO and WHO. These food standards and related texts aim at protecting consumers' health and ensuring fair practices in the food trade. The Codex Alimentarius includes standards for all the principal foods (processed, semi-processed or raw), for distribution to the consumer. The Codex Alimentarius includes provisions in respect of food hygiene, food additives, residues of pesticides and veterinary drugs, contaminants, labelling and presentation, methods of analysis and sampling, and import and export inspection and certification. Codex standards and related texts are not a substitute for, or alternative to national legislation. Every country's law and administrative procedures contain provisions with which it is essential to comply.

23 • See notably, Regulation (EC) No 1107/2009 of 21 October 2009 concerning the placing of plant protection products on the market and Regulation (EC) No 396/2005 of 23 February 2005 on maximum residue levels of pesticides in or on food and feed of plant and animal origin.

Focus on oilseed

The EU's heavy reliance on imported oilseeds differs among the concerned sectors.

EU imports of oilseeds and oilseed meals have been duty-free since the Dillon Round of the GATT in 1962. They grew significantly in the 1960s and 1970s following this agreement. Imports of soybean-based products (beans and meals) from Mercosur are already massive. Nevertheless, the reduction or even elimination of export taxes provided for in the EU-Mercosur agreement could further stimulate soybean production and exports to Europe, especially from Argentina.

Soymeal flows in the 6 Member states

Source : FAOstat 2022

Country	Import soymeal	Import soymeal extra EU	Export soymeal
Belgium	1 100	100	500
France	2 800	2 100	25
Germany	2 300	1 500	1 700
Italy	1 700	1 500	200
Netherlands	2 900	2 800	2 800
Spain	2 800	2 600	300

Italy and France, while even if they are the two first European soy producers, still rely heavily on imports. The Netherlands serves as a key trading hub for this commodity, importing substantial volumes from third countries, mainly soybeans and soy meals from the USA and South America, and re-exporting within the EU. Germany and Spain are also major soybeans importers with limited domestic production.

Soybeans flows in the 6 Member States - Source : Eurostat 2022

Country	Self-sufficiency	Production (Mt)	Imports (Mt)	Part imports extra-EU	Exports (Mt)	Part Exports extra-EU
Belgium	0%	0	320	70%	80	12%
France	53%	380	430	85%	90	8%
Germany	4%	120	3 160	67%	40	8%
Italy	30%	910	2 170	89%	20	6%
Netherlands	0%	0	3 730	98%	940	< 0,1 %
Spain	0%	4	3 200	99%	3	< 0,1 %

Rapeseed flows in the 6 Member States - Source : Eurostat 2022

Country	Self-sufficiency	Production (Mt)	Imports (Mt)	Part Imports extra-EU	Export (Mt)	Part Exports extra-EU
Belgium	2%	40	2 940	75%	1 180	4%
France	96%	4 520	1 500	82%	1 300	6%
Germany	45%	4 300	5 330	20%	80	27%
Italy	76%	50	20	6%	0	0%
Netherlands	2%	10	1 120	46%	720	0%
Spain	112%	250	50	15%	80	11%

Contrary to soy, the extra-EU imports of rapeseed meals are weak. France is the EU's leading rapeseed producer, with a self-sufficiency rate approaching 96%. However, it both imports and exports significant volumes, primarily importing from extra EU. Germany, another major producer, relies heavily on intra-EU trade imports to sustain its large crushing capacity. **The reliance on imports coming from third countries varies among Member States**, and the EU's main trading partners are Australia, Ukraine and Uruguay. Spain and Italy have limited rapeseed production and have not been studied in depth.

The Netherlands and Belgium, despite their low oilseeds production, play a key role in intra-EU trade, importing from extra-European countries and re-exporting to other Member states, thanks to their major ports such as Rotterdam and Antwerp. The well-developed crushing industry in both countries is also strengthening their role in intra-EU oilseed meals trade. Soybean meal is thus mainly produced in importing countries and 92% is made from seeds imported from third countries. Conversely, 74% of rapeseed meal produced in the EU is made from European seeds, mainly in Member States where these seeds are produced.

In summary, the EU's oilseed and protein meal sectors exhibit a complex interplay of domestic consumption and production, trade dependencies, and geopolitical factors.

Protein autonomy

Europe's dependence on imported oilseed raises the broader issue of the protein autonomy of European livestock farming and its model. Animal feed can also come from other crops, including other protein crops (peas, vetches, lupins, etc.) or forage.

Oilseed meals are by-products of the oil extraction process from oilseed crops such as rapeseed, soybeans, and sunflower seeds. They are widely used in Europe, primarily as a protein source in animal feed. Oilseed meals are used to enrich the diets of ruminants, providing them with the necessary proteins for milk production and growth. Rapeseed and soybean meals are particularly favoured. Soybean meal is also essential in the diets of pigs and poultry due to its high lysine content, an important amino acid for their growth. Rapeseed and sunflower meals are also used, although their protein content is lower than that of soybeans. Soybean meals are also largely used in aquaculture.

The issue of European protein autonomy is linked as much to the evolution of livestock systems as to European production. Indeed, the increase in consumption of animal products mechanically impacts the demand for vegetable proteins used to feed livestock. For the EU, the pursuit of greater protein independence is part of the choice to promote a more input-autonomous and sustainable agriculture.

From an environmental and climate perspective it would be preferable to use plant proteins for food rather than feed where possible, as not all proteins can be used for food. Greater awareness of the environmental impact of the EU agri-food system is shifting consumer preferences to more plant-based diets and encouraging organic agriculture. In the outcome of the recent strategic dialogue on Agriculture this was confirmed.

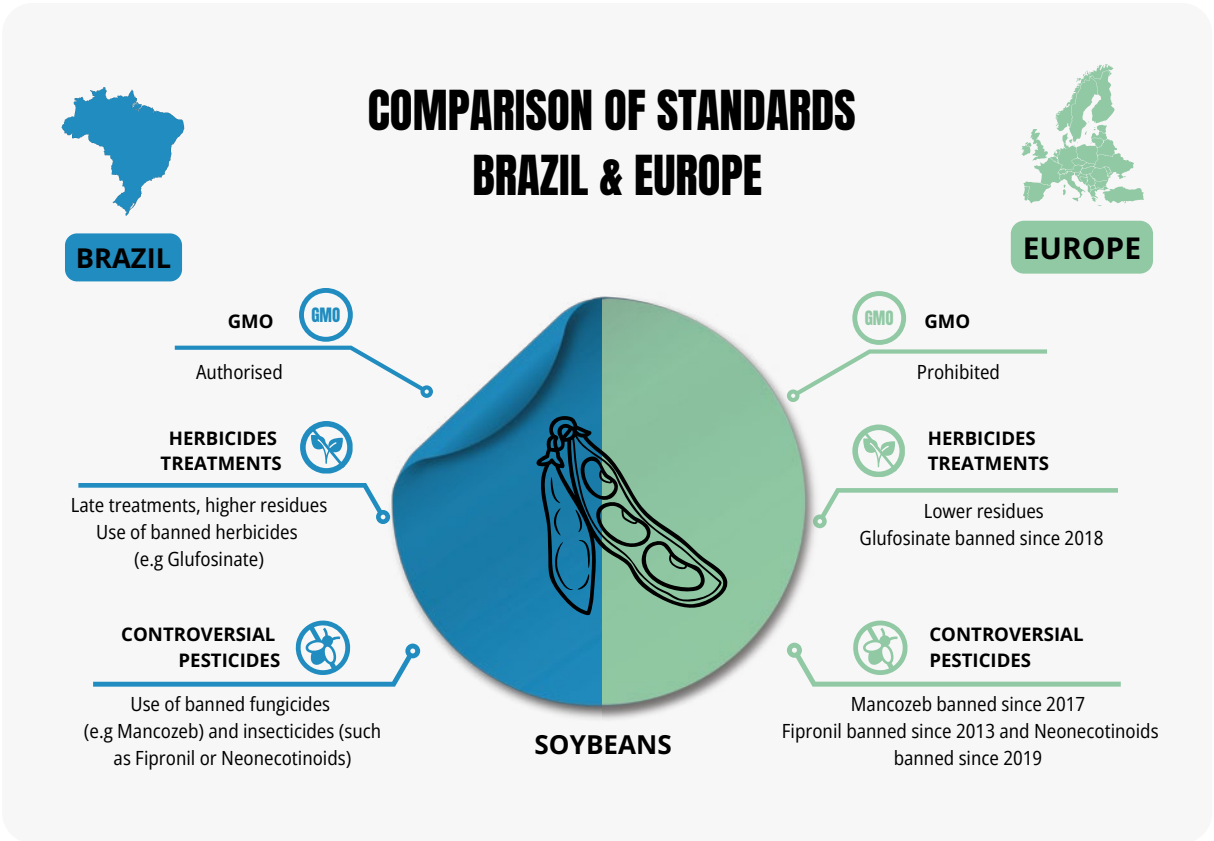
Boosting the EU's domestic production of plant-based proteins, increasingly used for human consumption, will increase the EU's competitiveness and resilience against future supply disruptions.

Comparison of practices for EU, Canada and Brazil

A significant disparity exists in pesticide regulations between the EU and its trade partners, such as Brazil for soybeans and Canada for rapeseed - also called canola.

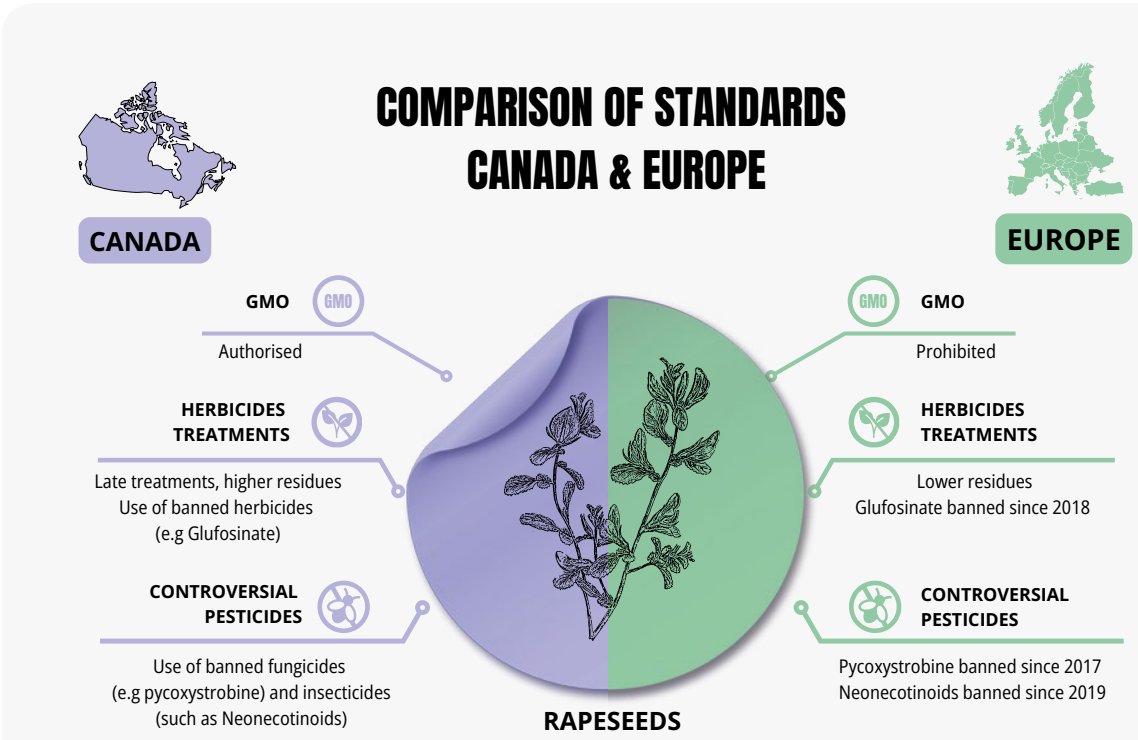
For instance, over half of the active substances approved for soy production in Brazil are prohibited in the EU[24] due to environmental and health concerns. This discrepancy extends beyond the substances themselves to application methods, with practices like late-season spraying and plane application often more prevalent outside the EU.

Among the roughly twenty active herbicide substances approved for canola cultivation in Canada[25]**, only half are authorised in the EU.** Some of these substances have been banned in the EU for over a decade, such as trifluralin and ethalfluralin, which were prohibited in 2008 and 2010, respectively. Late-season herbicide use, especially desiccants, risks contaminating harvested rapeseed. Canada's regulatory standards for four common desiccants (glufosinate, diquat, saflufenacyl, and glyphosate) differ significantly from the EU's. While glyphosate is restricted in the EU, it's widely used in Canada for pre-harvest desiccation. Glufosinate and diquat are banned in the EU due to environmental and health concerns, and saflufenacyl has never been authorized there.



24 • Comparison March 2024 between the databases of the Brazilian Ministry of Health and the European database on pesticide active substances.

25 • Comparison May 2024 between the saskatchewan province and the European database on pesticide active substances.



The primary use of genetically modified (GM) crops, including in Canada and Brazil, is for herbicide tolerance. For example, most GM canola varieties are engineered to resist herbicides, such as glyphosate or glufosinate. While glyphosate is approved for use in the EU, glufosinate is banned for agricultural purposes within the EU.

These divergent practices and regulatory standards enable Canadian or Brazilian producers to cultivate large-scale monocultures with more environmental impacts and therefore a better competitiveness than European farmers.

These GMO crops have contributed to increased pesticide applications, including those with late-season treatments. This has influenced the setting of higher MRLs, as pesticide manufacturers and importers have advocated for more lenient standards to facilitate trade[26]. For instance, **the MRL for glyphosate on soybeans is 200 times higher than for most other crops,** higher MRLs are also set for other imported crops such as rapeseed or barley[27].

The cases of rice and apple

Rice imports from India (12% of EU imports of basmati rice) highlight a significant discrepancy in pesticide regulations. Over half of the herbicides used in Indian rice production are banned in the EU, including substances linked to severe health issues like Parkinson's disease. While the EU has banned the use of paraquat since 2003, and has lowered its MRLs, this pesticide remains used in India.

26 • Example of import tolerance for glyphosate in soyabeans.

27 • Pesticide residue(s) and maximum residue levels (mg/kg)

DIVERGENT RULES IN LIVESTOCK FARMING

The EU has implemented a regulatory framework for livestock farming and animal protection. In contrast, many third countries have less stringent or non-existent measures in these areas, creating disparities that impact animal welfare, food safety, and public health. Many third countries lack comparable safeguards, leading to disparities in animal treatment.

A key point is the lack in third countries of robust animal traceability, from birth to slaughter, which is mandatory within the EU. Individual traceability of animals, whose products will be exported to the EU, is therefore an essential condition for the effectiveness of all mirror measures in terms of breeding practices, transport or other environmental impacts such as deforestation.

The use of hormones and antibiotics as growth promoters is also prohibited and strict regulations have been implemented to combat antimicrobial resistance. Finally, the EU has strict regulations on feed safety, particularly regarding the use of animal-derived products in ruminant feed to prevent diseases like BSE. These standards are often less rigorous in third countries, posing potential risks to animal and human health.

Rice is the only crop whose paraquat MRL is above the detection threshold[28].

The apple market is another interesting case. Imports from countries with less stringent regulations, such as Chile and South Africa, are essentially meeting off-season demand. Private standards like Global G.A.P. can provide additional assurances but do not fully replace robust government oversight.

28 • *ibid.*

Existing mirror measures

In this sector, some examples of concrete mirror measures exist, but are insufficient.

- **Growth hormones**

The most dated regulation concerning the ban on the importation into the European market of animal products treated with growth hormones was implemented in 1996.

- **Animal welfare**

European animal welfare standards at slaughter also apply to imported products, with only meat from approved establishments allowed to enter. However, the EU's ongoing efforts to enhance animal welfare regulations should be accompanied by reciprocal measures from trading partners to ensure a level playing field for other European standards absent within EU's trade partners.

- **Use of antibiotics as growth promoters**

The use of antibiotics as growth promoters has also been banned in the EU since 2006. Further restrictions were introduced in 2018, prohibiting the use of antimicrobials to enhance animal growth or yield. The EU has introduced a mirror measure to extend this ban to third-country operators wishing to export animal products to the EU but this measure is not yet effective[29]. And it only concerns antibiotics considered as medicinal products and not as feed additives. It therefore covers only a tiny proportion of the uses made by third-country producers who export their meat to the EU.

29 • This mirror measure will only come into force from 2026. The implementing act defining the list of third countries authorised to export their animal products to the European Union has still not been published. And a first implementing act, published in January 2024, requires third-country operators to complete a self-declaration attesting that the meat complies with the ban set by EU regulations. It relies on a self-declaration approach and is limited to providing templates for attestations that official veterinarians must issue to certify the non-use of antibiotics and growth hormones.

Antimicrobial resistance and international trade

Antibiotic resistance, or antibioresistance, occurs when a bacteria becomes resistant to one or several drugs and no longer responds to these treatments. While this is a natural process, it has been accelerated by human practices, among which agriculture notably contributes.

For instance, the exporting agroindustry in third countries often relies on intensive farming practices that involve the overuse of antibiotics to promote growth and prevent disease in livestock. These practices, permitted by varying regulations regarding antibiotic use in agriculture, can lead to the emergence of resistant bacteria that can then spread through international trade chains.

Reducing the use of antibiotics solely within the EU is therefore insufficient to ensure a global effort in reducing antibiotic resistance. Countries need to work together to establish consistent standards for antibiotic use in agriculture and food safety. Mirror measures can be used as a collaborative tool to address this global health challenge.

Deforestation free products

The EU's new deforestation regulation will prohibit the placing on the European market[30], the placing on the European market of beef from deforested areas, as well as other commodities. Beef importers will be required to provide the geographic coordinates of the land where the animals were raised. This geolocation requirement, aligned with EU traceability rules, will apply to all locations where cattle have been farmed. However, the specific implementation and control mechanisms remain uncertain, particularly given the lack of comprehensive traceability systems for cattle in most of Europe's trading partners. In addition, it would be worth extending the list of products and areas of woodland covered by the regulations to all high-risk agricultural products (including corn, cotton and biodiesel), which is not the case today.

30 • The end of 2024 was the originally planned implementation date in the text adopted in 2023, but it has been postponed by 12 months, according to the proposal from the European Commission published on October 2, 2024.

FOCUS ON BEEF AND SHEEP

The EU meat sector presents a complex interplay between producing countries and important trading hubs, depending on the considered Member State. The EU livestock sector has undergone significant changes, with a decline in production due to decapitalization.

While customs duties helped to mitigate some of the competitiveness gap, the proliferation of trade agreements already negotiated, such as those with Canada, Mexico, Chile, or New Zealand, and those under negotiation, with Australia, Mercosur, or India, is gradually opening up the EU market. A special role is the one of the post-Brexit UK which has emerged as a key trading partner, being an importer of beef as well as an exporter of both meats.

Beef meat flows in the 6 Member States - Source : Eurostat 2022

Country	Self-sufficiency	Production (Mt)	Imports (Mt)	Part Imports extra-EU	Export (Mt)	Part Exports extra-EU
Belgium	130%	240	80	4%	140	6%
France	91%	1360	390	14%	240	7%
Germany	84%	1000	480	9%	290	9%
Italy	76%	750	390	13%	140	8%
Netherlands	129%	420	460	23%	550	10%
Spain	117%	730	140	14%	250	10%

While overall beef self-sufficiency is slightly above 100%, the EU is an importer of specific high-value cuts, such as loin muscle. France, the largest European beef producer, has a declining self-sufficiency rate and imports a significant portion of its beef from third countries. Germany, the second-largest producer, imports and exports substantially, with a high reliance on intra-EU trade, representing around 44% of its domestic production.

While Italy and Spain are also large producers relying both on imports and exports to balance their markets, Italy also plays a significant role in importing live beef from other Member States. The Netherlands, a minor producer, is a major EU beef trading hub, importing from South America and re-exporting. Belgium, also a small producer, is a significant exporter within the EU of beef primarily imported from the EU.

Sheep and goat meat flows in the 6 Member States - Source : Eurostat 2022

Country	Self-sufficiency	Production (Mt)	Imports (Mt)	Part Imports extra-EU	Export (Mt)	Part Exports extra-EU
Belgium	11%	3	35	17%	14	0%
France	54%	85	131	57%	57	2%
German	34%	32	69	25%	7	14%
Italy	60%	32	27	7%	6	50%
Netherlands	68%	19	49	71%	40	5%
Spain	155%	130	7	14%	53	28%

The European Union's sheep and goat meat sector is quite reliant on imports. Despite being close to self-sufficiency (84%), the EU imports around 20% of its domestic consumption. The EU's imports primarily originate from the UK, New Zealand, and Australia. France and Spain exhibit contrasting trade patterns within the EU sheep meat market. France, a major producer, is a net importer, significantly relying on intra-EU trade. Conversely, Spain is largely self-sufficient and a net exporter.

The Netherlands serves as a pivotal trading hub for meat products, importing from third countries and re-exporting to other EU member states.

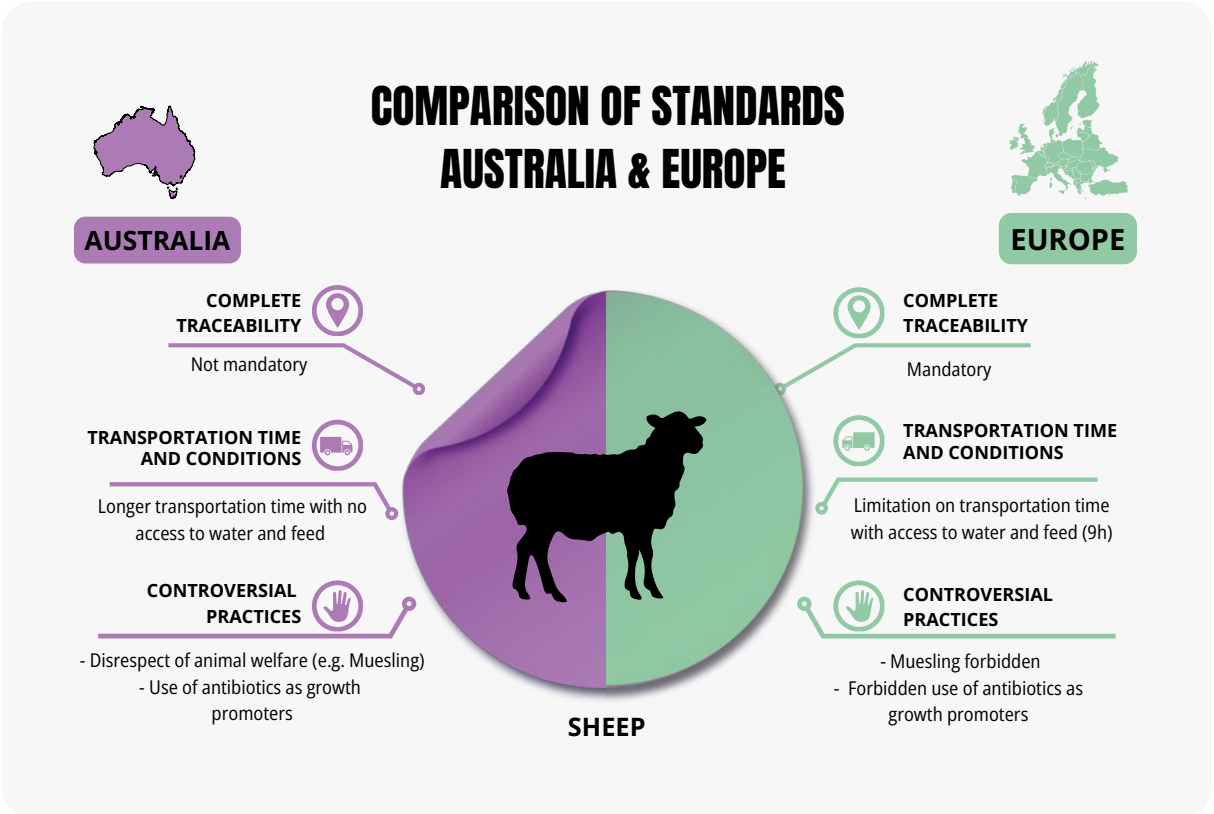
Overall, the EU's meat sector is characterised by varying levels of self-sufficiency among member states, a significant reliance on imports, and a complex network of intra-EU trade. The global trend of declining cattle herds while consumption remains relatively constant is contributing to increased beef and sheep imports from third countries.

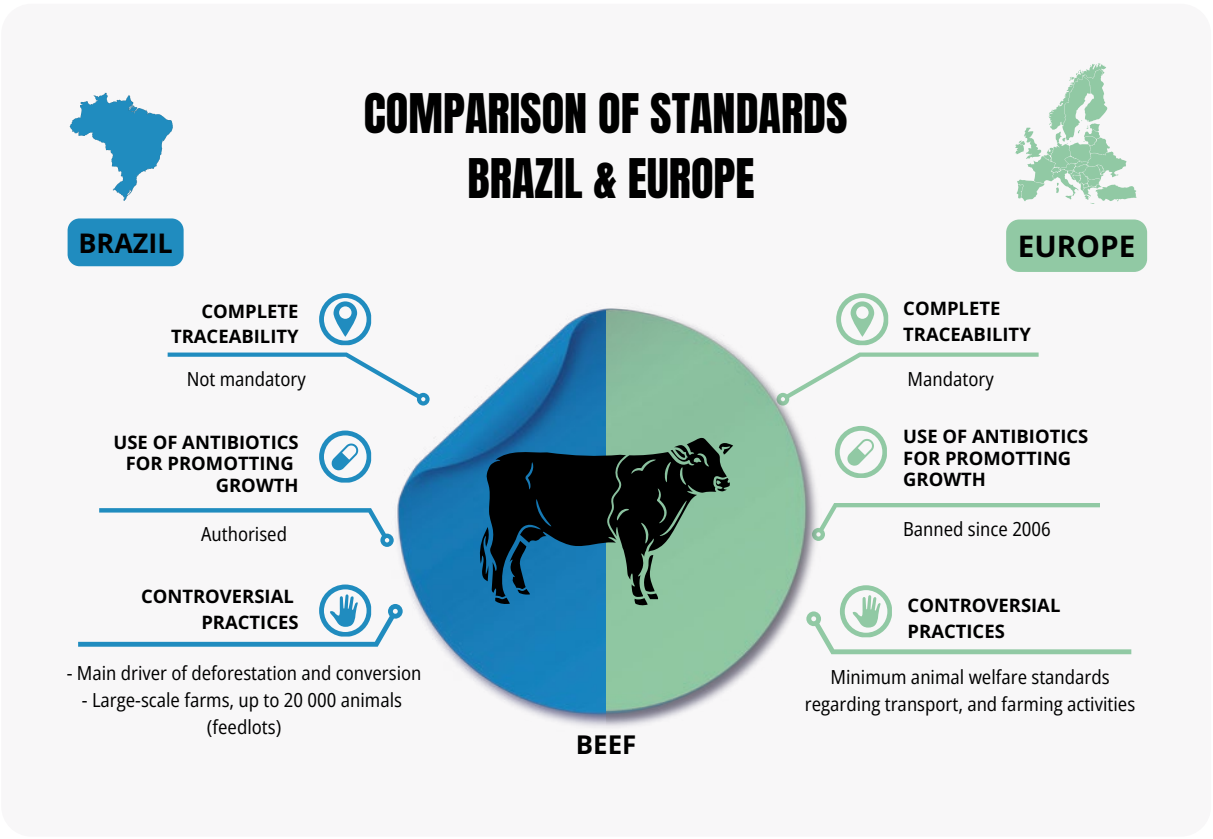
Comparison of practices

The absence of robust animal welfare, traceability, and antimicrobial control in some exporting countries poses challenges for the EU in ensuring food safety and consumer protection.

The use of growth-promoting antibiotics remains permitted in third countries, notably in Mercosur countries. **Despite being banned in the EU, this practice is not yet fully prohibited for products imported into the EU.** European regulations mandate complete traceability of animals from birth to slaughter. However, this requirement is absent in most third countries, including Brazil and Australia, with which the EU is seeking to establish trade agreements to facilitate beef and lamb imports. This traceability gap poses significant challenges for implementing mirror measures on veterinary drugs or addressing imported deforestation.

This double standard is not limited to environmental issues but also extends to societal issues, such as animal welfare. As the EU seeks





to revise its animal welfare rules, particularly regarding transport, a similar situation can be observed. European rules, including those already in force within the EU, ensure that animals are transported under well-defined conditions.

The study of the sheep sector has shown that European requirements are far from having equivalents in all EU trading partners. Australia, for example, with which the EU hopes to establish a free trade agreement, has minimal rules regarding the long-distance transport of live animals, and these rules are poorly enforced.

Due to the country's size and the fragmented nature of the sector, regulations allow most animals to travel for up to 48 hours without food or water. In comparison, European regulations, while not perfect, do not allow sheep to travel for more than 24 hours, with breaks every 9 hours during which they must be unloaded and fed. However, it is very likely that these additional constraints, which meet a strong societal expectation for animal welfare, weigh on the competitiveness of European livestock sectors.

Beyond transportation, other practices differ in this livestock farming sector between the EU and third countries. Mulesing, for instance, is a surgical procedure involving the removal of skin around a sheep's tail, especially in Merino breeds, to prevent flystrike, a disease that can reduce wool quality. Mulesing is often performed without anaesthesia by farmers and with minimal medical care. While New Zealand banned this practice in 2018, Australia still allows it. In 2020, a bill to ban mulesing in New South Wales by 2022 was rejected due to pressure from industry groups. The EU has banned mulesing for animal welfare reasons.

FREQUENTLY ASKED QUESTIONS

WHAT IS THE SCOPE OF MIRROR MEASURES ?

A number of European standards, particularly those relating to the safety of goods, apply to all goods sold on the EU market, regardless of their origin (see Box 2). But **imported products are not subject – apart from a few exceptions – to the European sanitary, environmental, and social production standards that European producers must comply with. This regulatory gap is widening as EU standards are gradually tightened in the framework of the EU Green Deal for instance.** At the same time, trade agreements promote trade liberalisation of almost all goods and services without taking account of this divergence in production standards.

Mirror measures means import requirements equivalent to EU production standards and can be set in all economic sectors.

ARE MIRROR CLAUSES IN TRADE POLICIES USEFUL ?

Import standards can be set for goods regardless of their origin or within the framework of preferential trade agreements. In this case, compliance with the standards is only required to benefit from the trade advantages granted under the agreement. These are referred to as mirror clauses.

Mirror measures can achieve more ambitious and more coherent results than mirror clauses. Firstly, once adopted, they apply to products imported from all regions of the world, whereas mirror clauses only apply to the trading partners of future FTAs. The geographical impact is therefore much smaller. Secondly, the introduction of legislation with mirror measures can incorporate detailed specific support measures for small-scale farmers and/or the sectors concerned in southern countries.

The inclusion of mirror clauses in trade agreements alone is not sufficient to align free trade agreements with the international environmental and human rights commitments made by the EU. For example, beyond the issue of production standards, the scope of goods and services covered by the agreement should be much more selective, since at present free trade agreements liberalise goods and services regardless of their impact on climate and the environment. However, to date, no significant mirror clauses have been included in trade agreements because negotiators consider the trade-offs required in the negotiations to be too high.

WHAT ARE THE IMPACTS OF MIRROR MEASURES ON MARKET ACCESS FOR SMALL-SCALE FARMERS IN THE GLOBAL SOUTH?

The implementation of mirror measures is not about closing access to the European market, but rather about mitigating the environmental and human rights impacts generated throughout the value chains of imported products. If these measures, aimed at ensuring compliance with certain essential standards, temporarily exclude some small producers from the European market, accompanying measures should be put in place to help them meet these production standards. Indeed, it seems difficult to justify the continuation of activities that are destructive to the environment or harmful to the health of producers and nearby populations in the name of fighting poverty. However, the calibration of mirror measures and their impact on small producers must be carefully anticipated. Are the additional costs related to decreased agricultural yields or necessary investments to comply with and ensure the traceability of the products in question?

These measures should be accompanied by rules to ensure the transparency of value chains and a better distribution of added value among the various links in the chain.The EU should plan to identify, support, and financially assist the most vulnerable links in the value chains during this transition.

In some cases, the effects on production standards in third countries can be quite rapid. Countries, like Ghana and Côte d'Ivoire, have already decided to set up national traceability systems–so that all cocoa production meets the new European requirements on deforestation[31]. In such a case, the traceability costs associated with establishing a dedicated supply chain could be eliminated.

31 • Ghana and Ivory Coast 'ready' for EU's anti-deforestation law | The Grocer, 25 july 2024.

But the main goal remains the definition of more ambitious international standards on these issues, in particular by including the objective of environmental protection in the mandate of the Codex Alimentarius.

Finally, from a food sovereignty perspective, sustainable local and regional markets should be given priority (except for products originating from a specific geography or unique expertise). Effective policies must therefore promote an increase in sustainable local or regional market opportunities along with farmers' incomes.

ARE MIRROR MEASURES COMPATIBLE WITH THE RULES OF THE WORLD TRADE ORGANIZATION?

The concern about mirror measures being incompatible with WTO rules is often used to hinder their adoption and prevent higher health and environmental standards in Europe. WTO rules generally require non-discrimination of imports and equal treatment for domestic and foreign like-products.

To address compatibility issues, mirror measures must comply with WTO agreements like the SPS Agreement, the TBT Agreement, and the GATT. They should be proportionate, non-discriminatory, and pursue legitimate objectives such as protecting health and the environment. The EU can use Article XX of the GATT to justify measures if they are necessary and not applied in a discriminatory or disguised restrictive manner. But for EU mirror measures to pass the WTO-legality test, the EU must ensure consistency for instance by ending national exemptions for banned pesticides and stopping the export of such pesticides.

Beyond that, there is also a need to reconsider or revise WTO non-discrimination rules to allow for measures that legitimately discriminate against products according to the sustainability of their production processes.

WHAT ARE THE DIFFERENT TOOLS RELEVANT TO ACHIEVE A GREATER RECIPROCITY OF PRODUCTION STANDARDS?

The implementation of import requirements must involve all European value chains, rather than relying solely on public authorities. One key tool for achieving this is due diligence, as reflected in legislation aimed at combating imported deforestation and in the corporate duty of vigilance law. The vigilance obligations outlined in this upcoming legislation should compel companies to actively manage their value chains and mitigate the risks of human rights abuses and environmental harm in third countries. Although this law does not mandate specific outcomes, it requires companies and economic actors to take concrete steps to identify, prevent, and mitigate risks.

A key aim of the legislation is to ensure that third countries are not exposed to practices that are banned within the EU, especially those related to the protection of human health and the environment. This legislation could serve as a mechanism for European value chain actors to verify that their partners and suppliers in third countries are not engaging in practices prohibited in Europe.

HOW TO IMPLEMENT AND MONITOR MIRROR MEASURES?

The EU has already implemented several regulations that are similar to mirror measures, since they condition access to the European market for certain products to the respect of European health and environmental standards. For example, livestock and organic farming products must meet specific requirements in terms of production methods to access the European market[32].

In the livestock sector, the EU has prohibited the import of animals, meat, or animal products from third countries that approve the use of growth hormones since 1996. Countries wishing to export animal products to the EU must therefore comply with the ban on growth hormones by setting up a specific system dedicated to the European market. The main characteristics of this system are as follows: This system is under the responsibility of the country's authorities ; the European Commission has the competence to carry out controls in third countries. The control is on the process, not the product. And slaughterhouses must be accredited in order to trade with the EU. The European Commission approves slaughterhouses that meet European standards (in terms of hygiene, but not animal welfare)

Similarly, an imported product can be marketed as organic in the EU provided that it complies with one of the following conditions:

- Comply with the production and control rules of the third country that are recognised under an international agreement as being equivalent to EU rules. The national authorities of the country of origin supervise and possibly operate the inspection and certification of organic products. Agreements governing the import of organic products have been concluded with these countries, as their standards and control measures have been found to be equivalent to those in the EU. Under the previous version of the regulation (Commission Regulation (EC) 1235/2008 of 8 December 2008), Argentina, Australia, Canada, Chile, Costa Rica, India, Israel, Japan, Republic of Korea, Switzerland, Tunisia, the United States and New Zealand were recognised as "equivalent countries". With regulation 2018/848, all these third countries will have to renegotiate the terms of their bilateral trade agreements.

- Comply with EU organic production rules and has a certificate provided by the relevant control authorities or control bodies in non-EU countries confirming such compliance. This means that all operators and groups of operators, exporters included, have undergone controls by control authorities or control bodies, which in turn have been recognised by the European Commission, and those authorities or bodies have provided all such operators, groups of operators and exporters with the above-mentioned certificate.

The implementation of environmental mirror measures applied to pesticides, but also to other sectors, could be based on the existing control and traceability processes in the field of livestock farming and organic agriculture.

32 • EEB, Veblen Institute and FNH, "Environmental mirror measures: need and technical feasibility. A Pesticides case study. Proposals for the operational implementation of environmental mirror measures", June 2023.

*To promote a fair and sustainable world, **the National Centre for Development Cooperation** (CNCD-11.11.11) coordinates the voices of over 70 Belgian international solidarity NGOs and thousands of volunteers around three missions: 1. to organize Operation 11.11.11 each year to finance around fifty development programs in poor countries in the South; 2. to coordinate campaigns to raise awareness among the Belgian population of the issues involved in global citizenship and solidarity; 3. to challenge political leaders through advocacy work.*

***Feedback EU** is a non-governmental food justice organisation based in The Hague, Netherlands with a representation in Brussels. Together with our sister organisation Feedback Global and our partners from the national / European level as well as from the Global South, we strive for a food system that is not only in balance with nature but also fair to those who produce and consume food. For this purpose, we do research, conduct advocacy campaigns, challenge power structures, catalyse action and empower people to achieve positive change.*

***Slow Food** is a global movement of farmers, shepherds, fishers, food artisans and suppliers, cooks and activists, united by the common goal of ensuring everyone has access to good, clean and fair food. Founded in Italy in 1986, we are now active in more than 160 countries. We envision a world where everyone can eat food that is good for them, good for the people who grow it and good for the planet. We cultivate a worldwide network of local communities and activists who defend cultural and biological diversity, promote food education and influence policies in public and private sectors.*

*Recognized as being of public utility, nonpartisan and non-denominational, **the Foundation for Nature and Mankind** has been working since 1990 to make ecological solutions the norm in our lives, leaving no one behind. By placing humans at the heart of its actions, it removes the economic, political, psychological, and social barriers that hinder this horizon, the only possible future. To achieve this, the Foundation demonstrates that acting for the climate and biodiversity is in everyone's interest. With its scientific advisory board and partners, it offers those with the power to act, from policymakers to economic actors and citizens, solutions that reconcile the planet's imperatives with human needs. The demand for action, co-construction, solidarity, and dialogue with all are the fundamentals of its method.*

***SEO/BirdLife,** the Spanish Ornithological Society, is the oldest environmental NGO in Spain. Founded in 1954, its mission has remained the same since then: with birds as its flag, they want to conserve biodiversity with the participation and involvement of society. The vision, mission and values of SEO/BirdLife are aimed at fulfilling a social function, studying and conserving birds and their habitats, and disseminating their values. The ultimate interest of this NGO is the preservation of ecosystems as providers of essential services of well-being for humanity. It currently has more than 25,000 members, a figure that is growing day by day. As for the alliances established by SEO/BirdLife, it should be noted that the organization represents Spain in BirdLife International, a federation that brings together associations dedicated to the conservation of birds from all over the world. It is the largest global organization for the conservation of birds and nature, with representatives in 121 countries and mobilizing approximately 13 million members and supporters worldwide.*

***Humundi,** formerly SOS Faim, is an NGO dedicated to fighting hunger, rural poverty and inequalities. Working alongside more than 70 organizations on three continents (Africa, Latin America and Europe), Humundi supports the transition towards sustainable food systems. To address these local and global challenges, we are working in four areas: accelerating the agroecological transition; access to financing; advocating for sustainable agricultural policies; and supporting citizen engagement.*

***The Veblen Institute for Economic Reforms** is a non-profit think tank promoting policies and civil society initiatives for a fair ecological transition. Our current unsustainable economic model must be profoundly transformed to respect planetary boundaries and promote social justice.*