

Open Letter to the European Commission

Concerns on the EU–Mercosur Agreement and its implications for sustainable European agriculture

To:

- Ms Ursula von der Leyen – President of the European Commission
- Mr Maroš Šefčovič – Commissioner for Trade
- Mr Olivér Várhelyi – Commissioner for Health and Food Safety
- Mr Christophe Hansen – Commissioner for Agriculture
- The President of the European Parliament
- Chair of the Committee on International Trade (INTA)
- Chair of the Committee on the Environment, Public Health and Food Safety (ENVI)
- Chair of the Committee on Agriculture and Rural Development (AGRI)

Brussels, 16 December 2025

Dear President von der Leyen,
Dear Commissioners,
Dear President of the European Parliament,
Dear Chairs of the European Parliament,

On behalf of the European Crop Care Association (ECCA), representing manufacturers and formulators of post-patent plant protection products across Europe, we wish to express our concerns regarding several aspects of the EU–Mercosur Trade Agreement currently under discussion.

ECCA supports fair, rules-based and science-based trade. However, any agreement must ensure a genuine level playing field for European farmers and must not expose European consumers to higher risks through products that do not meet EU safety and environmental standards. Trade policy should not become a channel through which substances and practices that are no longer acceptable in the EU re-enter the EU food chain, undermining citizens' trust in the European regulatory system and European industry.

In this context, we would like to highlight four critical points:

1) Imports linked to substances banned in the EU

The agreement may facilitate imports of agricultural goods—including meat, soy, cereals, fruit and vegetables—produced using pesticides that are banned in the EU for health and environmental



reasons (for example, thiacloprid). This creates an inherent asymmetry: while European farmers must comply with strict requirements to protect consumers and the environment, imported products may be produced using substances considered too hazardous for use within the EU. This is not only a matter of fairness, but also of preventing European consumers from being indirectly exposed to active substances that EU regulators have already deemed incompatible with the EU level of protection.

2) Divergent SPS standards and increased risk of non-compliance

Allowing imports from regions applying less stringent rules on pesticide authorisation, maximum residue levels and enforcement may create a structural risk that products with higher or more complex residue profiles enter the EU market. Even where compliance with EU residue limits is claimed, weaker upstream controls and monitoring can increase the likelihood of non-compliance and incidents. Over time, such divergences risk lowering the EU's effective level of protection in practice, eroding consumer confidence in food safety, and putting responsible European farmers—who invest in safer products and practices—at a competitive disadvantage.

3) Regulatory gap and limited enforceable safeguards

As currently understood, the draft agreement does not appear to include specific, binding provisions ensuring that imported goods are produced under conditions that can be credibly verified as equivalent in outcome to EU restrictions on hazardous substances. Nor does it seem to provide sufficiently robust and rapid mechanisms to address systematic non-compliance and impose effective remedial measures. This may create a loophole in food safety, traceability and risk management: European consumers may assume that “sold in the EU” means “meeting EU-equivalent protections”, while in reality key production-related risks may be externalised to jurisdictions with different regulatory frameworks and enforcement capacities.

4) Unfair competition and pressure on the transition to sustainable EU farming

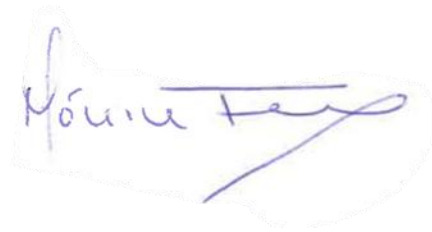
European producers operate under one of the world's strictest regulatory frameworks, bearing higher costs to phase out hazardous substances and invest in safer, more sustainable solutions. Competing against products grown with cheaper but more hazardous pesticides and under weaker controls would not only distort markets; it would also send a negative signal to farmers engaged in the transition required by the EU's sustainability objectives. In practice, the agreement could reward less sustainable production systems abroad while placing additional pressure on EU farmers already facing economic, climatic and regulatory challenges.

ECCA therefore calls on the European Commission and the European Parliament, ahead of any conclusion and ratification of the agreement, to ensure that the EU–Mercosur framework:

- **Ensures verifiable equivalence in outcome** between imported and EU-produced goods, in particular regarding substances banned or severely restricted in the EU;
- **Embeds clear and binding commitments** on pesticide standards, residue controls and cooperation on enforcement, including **effective and rapid safeguard/remedial measures** in case of persistent non-compliance; and
- **Strengthens traceability and control mechanisms** throughout the supply chain, including appropriate verification and effective enforcement at the border, so that European consumers can be confident that imported products are produced under conditions that do not compromise their health or the environment.

Europe's leadership in sustainability and food safety depends on consistency between internal regulation and external trade policy, as defined jointly by the European institutions. A truly sustainable agreement must protect consumers, farmers and the environment alike—ensuring that trade supports, rather than undermines, the EU's objectives and the credibility of its high standards in the eyes of citizens.

Yours sincerely,



Monica Teixeira

President, European Crop Care Association (ECCA)

