

(English version)

**Priority question for written answer P-003636/25
to the Commission
Vytėnė Povilas Andriukaitis (S&D)
(19 September 2025)**

Subject: Counterfeit and illegal pesticides

In 2015, the Commission's Directorate-General for Health and Food Safety published an ad hoc study on the trade of illegal and counterfeit pesticides in the EU, which estimated that such products accounted for approximately 10% of the total EU plant protection product market. The study also included 17 recommendations for addressing the issue and improving enforcement.

1. Could the Commission indicate which of these 17 recommendations have been implemented over the past decade?
2. In 2023, as part of Europol's joint operation Silver Axe, participating law enforcement authorities seized 2 040 tonnes of counterfeit or illegal pesticides, arrested 21 suspects, and dismantled several production sites, an increase compared to the 1 150 tonnes seized in 2022. Is the Commission considering launching a follow-up study to assess the current scale of the problem in the EU, including whether the prevalence of illegal and counterfeit products has increased or decreased since 2015? Such a study could also propose updated recommendations to strengthen enforcement, enhance cross-border cooperation, and address remaining legislative and operational loopholes.

Submitted: 19.9.2025

**Answer given by Mr Várhelyi on behalf of the European Commission
(19 November 2025)**

The Commission has already implemented several recommendations of the 2015 report, in particular:

Commission Implementing Regulation (EU) 2023/564 ⁽¹⁾ has harmonised the content and format of the records for professional users of plant protection products (PPP) under Article 67 of Regulation (EC) No 1107/2009 ⁽²⁾, which will improve traceability and facilitate control of the use of PPP across the EU.

Commission Implementing Regulation (EU) 2023/574 ⁽³⁾ has set out detailed rules for the identification of unacceptable co-formulants in PPP. Commission Regulation (EU) 2024/1487 ⁽⁴⁾ has established a work programme for the gradual review of safeners and synergists. Thus, the rules concerning the composition of PPP are further harmonised at EU level which will facilitate the control on their manufacturing, import and marketing.

Commission Delegated Regulation (EU) 2024/2104 ⁽⁵⁾ of 27 June 2024 supplementing Regulation (EU) 2017/625 ⁽⁶⁾ (OCR) has established a pre-notification system (TRACES) under which competent authorities may request notification of PPP entering the territory of the Member State concerned.

A draft Regulation for updating labelling requirements for PPP is currently discussed in the Standing Committee on Plants, Animals, Food and Feed. ⁽⁷⁾ The draft sets a specific labelling requirement as regards PPP subject to parallel trade permits ⁽⁸⁾ and traceability requirements which will facilitate the control.

An overview of applicable national sanctions under Article 72 of Regulation (EC) No 1107/2009 has been published in order to increase transparency ⁽⁹⁾.

⁽¹⁾ http://data.europa.eu/eli/reg_impl/2023/564/oj.

⁽²⁾ <http://data.europa.eu/eli/reg/2009/1107/oj>.

⁽³⁾ Commission Implementing Regulation (EU) 2023/574 of 13 March 2023 setting out detailed rules for the identification of unacceptable co-formulants in plant protection products in accordance with Regulation (EC) No 1107/2009 of the European Parliament and of the Council (OJ L 75, 14.3.2023, pp. 7-14, ELI: http://data.europa.eu/eli/reg_impl/2023/574/oj).

⁽⁴⁾ Commission Regulation (EU) 2024/1487 of 29 May 2024 defining data requirements for the approval of safeners and synergists and establishing a work programme for the gradual review of safeners and synergists on the market in accordance with Regulation (EC) No 1107/2009 of the European Parliament and of the Council, (OJ L, 2024/1487, 30.5.2024, ELI: <http://data.europa.eu/eli/reg/2024/1487/oj>).

⁽⁵⁾ Commission Delegated Regulation (EU) 2024/2104 of 27 June 2024 supplementing Regulation (EU) 2017/625 of the European Parliament and of the Council as regards the cases where and the conditions under which competent authorities may request operators to notify the arrival of certain goods entering the Union, (OJ L, 2024/2104, 25.9.2024, ELI: http://data.europa.eu/eli/reg_del/2024/2104/oj).

⁽⁶⁾ Regulation (EU) 2017/625 of the European Parliament and of the Council of 15 March 2017 on official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products, amending Regulations (EC) No 999/2001, (EC) No 396/2005, (EC) No 1069/2009, (EC) No 1107/2009, (EU) No 1151/2012, (EU) No 652/2014, (EU) 2016/429 and (EU) 2016/2031 of the European Parliament and of the Council, Council Regulations (EC) No 1/2005 and (EC) No 1099/2009 and Council Directives 98/58/EC, 1999/74/EC, 2007/43/EC, 2008/119/EC and 2008/120/EC, and repealing Regulations (EC) No 854/2004 and (EC) No 882/2004 of the European Parliament and of the Council, Council Directives 89/608/EEC, 89/662/EEC, 90/425/EEC, 91/496/EEC, 96/23/EC, 96/93/EC and 97/78/EC and Council Decision 92/438/EEC (Official Controls Regulation), OJ L 95, 7.4.2017, pp. 1-142, ELI: <http://data.europa.eu/eli/reg/2017/625/oj>.

⁽⁷⁾ https://food.ec.europa.eu/document/download/3e779648-c268-48fc-97f2-27b5efaf49f9_en?filename=sc_phyto_20250709_ppl_sum.pdf.

⁽⁸⁾ In line with the judgment of the European Court of Justice in Case C-830/21, Syngenta Agro — it should be clarified that the batch number of the formulation concerned allocated by the initial manufacturer, the permit number and the name and address of the permit holder should be included on the label of a parallel traded product.

⁽⁹⁾ https://food.ec.europa.eu/document/download/243bfbfd5-55a8-48e0-9a8a-ea5fb5a48d86_en?filename=pesticides_legis_com_article-72-imp.pdf.

While the Commission has not planned a follow-up study as the one referred to by the Honourable Member, as stated below, it is working in the area and would consider it if necessary.
