



10 JULY 2026

FOOD AND FEED SAFETY OMNIBUS (2025/0410)

COCERAL – FEDIOL – FEFAC CALL FOR A PROPORTIONATE APPROACH TO MRLs

While supporting the objectives of the Simplification Omnibus on Food and Feed Safety (FFS Omnibus), **COCERAL, FEDIOL and FEFAC** remain highly concerned about the potential impact on trade and on the EU food and feed security of the proposal allowing maximum residue levels (MRLs) of certain EU non-approved active substances to be set at the limit of quantification (LOQ), merely based on their hazard profile.

At this crucial stage of the legislative procedure, we call MEPs to:

- Seriously consider the potential impact on trade of grains and oilseeds and on the whole food and feed supply chain resilience before further strengthening the requirements regarding MRLs, especially in the context of acknowledged EU dependency on imported high protein feed.
- Secure and clarify the substance-by-substance ("case-by-case") approach to decide whether to set the MRLs for the targeted active substances at the LOQ, following an impact assessment, to exclude an application of the hazard-based approach by default (see proposal for amendments in Annex).

Imports of protein-rich soyabeans are essential for the resilience of the EU food and livestock sectors

Lowering MRLs to LOQ, merely based on hazard criteria, would create significant challenges in sourcing compliant raw materials from Third Countries, resulting in higher costs of food and feed products. Such trade disruptions would occur at a time when it is recognised that, while reducing the EU's dependence on imported protein remains an important strategic objective, imports will continue to be necessary to meeting the Union's protein needs.

Indeed, in its recently published Protein Action Plan and Livestock Strategy, the EU Commission sets as an objective to reduce the EU dependency from Third Country for the sourcing of high protein feed from 25 to 35%. This is a clear acknowledgement that the **EU will continue depending for 65% from Third Countries, and more specifically for soybean and soybean meals**, 94% of which being currently imported from Third Countries.

A blanket decision to set the MRLs for pesticides not authorised in the EU in soybeans at the "technical zero" level, **without considering the economic impact on EU food and feed processors and livestock farmers through higher feed costs, or the potential animal welfare consequences of supply disruptions**, would further erode the competitiveness of European food and livestock production. Such an approach would weaken the sector's ability to compete effectively both within the EU market and on international export markets.



Strategic dependency and crushing displacement outside the EU

Imported raw material, as an essential complement to the EU production, are vital to enable our processing industries to operate in a continuous, efficient and cost-effective way. Without these additional imported volumes, the industry will be highly impacted, may reduce in size, and will directly affect in turn local EU crop farmers who would be losing their primary market as oilseeds crushers are the main demand drivers for oilseeds.

In addition, if sourcing Third-Country oilseeds to be crushed in the EU becomes too difficult and therefore costly, the very same oilseeds will be crushed elsewhere and imported into the EU as refined oils or meals. Therefore, the relocation of crushing activities outside the EU would have direct socio-economic consequences, with losses of industrial activity and jobs, particularly in rural and port areas, and erosion of the EU's agri-food industrial base, undermining domestic oilseed cultivation and transformation.

The current EU MRL framework: a pillar of scientific integrity, ensuring a high level of protection while considering divergent global production characteristics to ensure smooth trade

Different climatic zones, a diverging production intensity and geographic situations lead to different cropping systems and therefore different needs of chemical inputs and agricultural practices in general. Introducing unconditional hazard-based criteria for MRLs to achieve reciprocity would ignore some considerable constraints in terms of global production systems related to such geographic realities. Countries closer to the equator have a natural advantage on growing crops like corn and soybeans, as they have longer favourable vegetative periods compared to Europe, which is essential for soybeans as they are photoperiodic and corn which cannot grow in a cold environment. However, these climatic and geographic conditions come with different constraints in terms of pest and weather volatility, which leads to different good agricultural practices than in Europe and therefore a different need of chemical inputs.

As current EU risk assessment and management process already ensures that the **residues resulting from using these inputs on imported products comply with the EU rules and as pose no risk** for human health, a further lowering of MRLs to LOQ would neither increase public health nor serve the real interests of the European farming sector: as explained above, **it would however substantially weaken the EU oilseed crushing capacity, the EU feed industry and ultimately the European livestock farming sector.**

Considering practical implementation hurdles when promoting more reciprocity

In addition to putting the EU regulatory framework at risk of non-compliance with WTO obligations, strengthening alignment of production standards would generate considerable implementation difficulties for both exporters and EU importers, which will affect the rest of the food and feed supply chain and severely undermine the principle of comparative advantages, which is crucial for trade. Promoting convergence of production standards must be pursued through international standard-setting bodies rather than relying on one-off measures or on a reinforced EU reciprocity framework, which could cause significant disruption to trade and markets.

ANNEX

PROPOSAL FOR AMENDMENTS

- **RECITAL 27 OF THE OMNIBUS ON FOOD AND FEED SAFETY**

Commission Proposal	Proposal for amendment
(27) Regulation (EC) No 396/2005 sets the procedure for defining maximum residue levels ("MRLs") of pesticides in or on food and feed of plant and animal origin. In the Vision for Agriculture and Food, the Commission announced it would pursue a stronger alignment of production standards applied to imported products, notably on pesticides and establish the principle, in compliance with the EU's international obligations, that the most hazardous pesticides banned in the EU for health and environmental reasons should not be allowed back to the EU through imported products. To advance on this, the Commission has launched in November 2025 a study to prepare an impact assessment that will consider the impacts on the EU's competitive position and the international implications and, if appropriate, propose amendments to the legal framework. In the meantime Regulation (EC) No 396/2005 should already be amended to provide that, for substances that are not approved in the Union and that have certain particularly hazardous properties, MRLs that have been set based on good agricultural practices in third countries or Codex maximum limits may be set at the limit of quantification (technical zero).	(27) Regulation (EC) No 396/2005 sets the procedure for defining maximum residue levels ("MRLs") of pesticides in or on food and feed of plant and animal origin. In the Vision for Agriculture and Food, the Commission announced it would pursue a stronger alignment of production standards applied to imported products, notably on pesticides and establish the principle, in compliance with the EU's international obligations, that the most hazardous pesticides banned in the EU for health and environmental reasons should not be allowed back to the EU through imported products. To advance on this, the Commission has launched in November 2025 a study to prepare an impact assessment that will consider the impacts on the EU's competitive position and the international implications and, if appropriate, propose amendments to the legal framework. In the meantime Regulation (EC) No 396/2005 should already be amended to provide that, for substances that are not approved in the Union and that have certain particularly hazardous properties, MRLs that have been set based on good agricultural practices in third countries or Codex maximum limits may be set at the limit of quantification (technical zero) <i>if considered appropriate in the light of the outcome of an impact assessment. Such a substance-by substance impact assessment should consider, in particular, the EU import dependency on the targeted agricultural commodities, the specificities and needs of the EU food and feed supply chain, including its vulnerability in crisis situations such as geopolitical disorders, the respective effects of lowering MRLs to LOQ on all actors of the food and feed supply chain, such as crop and livestock farmers, traders, processors, retailers, services providers, and consumers, as well as the compatibility of such measures with the WTO rules.</i>

Justification: Article 3(4) of the FFS Omnibus, amending article 14(2) of Regulation (EC) No 396/2005, conditions the lowering to technical zero of MRLs for hazardous substances not authorized in the EU to an impact assessment that may conclude to the appropriateness of such a lowering. This condition is an essential element of the proposal and should therefore be reflected in Recital 27. In addition, the recital should specify the elements to be considered at least in an impact assessment and make sure that the impact on all EU operators of the food and feed chain is equally evaluated, i.e. not only the upper part of the feed and food chain but also the middle and the downward part of the chain, whose capacity

to secure a sufficient sourcing of agricultural products as well as food and feed ingredients at an affordable price for the final consumer may be severely impacted.

- **ARTICLE 3(4) OF THE OMNIBUS ON FOOD AND FEED SAFETY, AMENDING ARTICLE 14(2) OF REGULATION (EC) No 396/2005**

Commission Proposal	Proposal for amendment
“(a) In paragraph (2), a new subparagraph is added: – ‘By way of derogation from point (e), where the active substance has one or more of the properties set out in points 3.6.2 to 3.6.5, 3.7.1 to 3.7.3, and 3.8.2 of Annex II to Regulation (EC) No 1107/2009 according to the latest available evaluation under Regulation (EC) No 1107/2009 or to a specific evaluation in accordance with Article 43 of Regulation (EC) No 396/2005, a MRL that has been set based on a CXL or a GAP implemented in a third country can be revoked and set in accordance with Article 18(1)(b) or Article 16 if considered appropriate in the light of the outcome of an impact assessment”.	“(a) In paragraph (2), a new subparagraph is added: – ‘By way of derogation from point (e), where the active substance has one or more of the properties set out in points 3.6.2 to 3.6.5, 3.7.1 to 3.7.3, and 3.8.2 of Annex II to Regulation (EC) No 1107/2009 according to the latest available evaluation under Regulation (EC) No 1107/2009 or to a specific evaluation in accordance with Article 43 of Regulation (EC) No 396/2005, a MRL that has been set based on a CXL or a GAP implemented in a third country can be revoked and set in accordance with Article 18(1)(b) or Article 16 if considered appropriate in the light of the outcome of an impact assessment taking account of, in particular: (a) <i>The Union import- dependency regarding the targeted agricultural commodities;</i> (b) <i>The specificities and needs of the EU food and feed supply chain, especially in cases of crises or geopolitical disorders;</i> (c) <i>The competitive position of all EU actors of the food and feed supply chain on the EU and export markets;</i> (d) <i>The compatibility of the measures with the WTO rules.</i>

Justification: Article 3 (4) of the FFS Omnibus, amending Article 14(2) of Regulation (EC) No 396/2005, conditions the lowering to technical zero of MRLs for hazardous substances not authorized in the EU to an impact assessment that may conclude to the appropriateness of such a lowering. This condition is an essential element of the Proposal and Article 14(2) should therefore specify the elements to be considered at least in an impact assessment and make sure that the impact on all EU operators of the food and feed chain is equally evaluated, i.e. not only the upper part of the food and feed chain but also the middle and the downward part of the chain, whose capacity to secure a sufficient sourcing of agricultural products as well as food and feed ingredients at an affordable price for the final consumer may be severely impacted.

COCERAL is the European association of trade in cereals, oilseeds, rice, pulses, olive oil, oils and fats, animal feed and agrosupply. COCERAL represents the interest of the European collectors, traders, importers, exporters and port silo storekeepers of the above-mentioned agricultural products. **FEDIOL**, the EU vegetable oil and protein meal industry association, represents the interests of the European oilseed crushers, vegetable oil refiners and bottlers covering over 85% of the sector’s activity in Europe. The sector produces crude oils and protein meals from rapeseed, sunflower seed, soybeans, linseed and refined vegetable oils, including from tropical oils. **FEFAC**, the European Compound Feed Manufacturers’ Federation, represents 23 national associations of manufacturers of premixtures and compound feed for food producing animals in the EU Member States, as well as associate members in the UK, Norway, Switzerland, and Turkey.