

Divergence of GB and EU pesticide standards

April 2025

Since 2021, Great Britain's pesticide standards have been diverging from those of the EU. The two clearest examples of this divergence have been a) the granting of automatic extensions to the approval of tens of pesticide active substances and b) changes in hundreds of GB Maximum Residue Levels (MRLs). These changes have been led by Great Britain's Health and Safety Executive (HSE) and made without parliamentary scrutiny or public consultation.

While this short briefing focuses on divergence, it is worth noting that many of these changes also constitute regression as a range of GB pesticides standards have been lowered to below where they sat in December 2020.

Recommendation:

Any new SPS Agreement between the UK and EU should tackle this ongoing divergence by including provisions committing the UK to:

- **Rectifying the divergence of GB pesticide standards from their EU equivalents that has occurred since EU exit.**
- **Agreeing that GB pesticide standards will maintain dynamic regulatory alignment with EU pesticide standards going forward.**

To discuss the issues raised in this briefing further, please contact PAN UK's Interim Director Josie Cohen at josie@pan-uk.org and UK Policy Manager Nick Mole at nick@pan-uk.org.

1. Pesticide approvals

Since leaving the EU, the UK has lacked the capacity to properly undertake the pesticide approval and renewal functions that were shared by the 28 EU Member States. As a result, the UK government has chosen to grant automatic approval extensions for a wide range of active substances. The result is that there are now numerous pesticide active substances that are approved for use in Great Britain but not in the EU.

In addition to the potential risk to human health and the environment, this ongoing divergence threatens to undermine the so-called 'level-playing field' by enabling GB farmers to grow food more cheaply than their European counterparts using pesticides banned in the EU.

The tables below detail the full picture on active substance approval divergence on active substances as of the beginning of April 2025 (data extracted from the [GB Approvals Register](#) and [EU Pesticides Database](#)). The tables also identify which of these active substances are classified as Highly Hazardous Pesticides (HHPs) and a brief description of the reason for such classification. For further detail on HHPs, see the [2024 PAN International List of Highly Hazardous Pesticides](#).

Table 1: Not approved in EU, approved in GB with products registered

- 12 actives
- 7 HHPs

Pesticide active substance	Products registered in GB	HHP?	Human health and/or environmental hazard	GB expiry date	EU expiry date
Benthiavalicarb	6	Yes		31/07/2027	13/12/2023
Clofentezine	2		Carcinogen, EDC	31/12/2027	11/11/2023
Dimethomorph	32	Yes	Acute toxicity	31/07/2027	20/05/2024
Dimoxystrobin	1	Yes		31/01/2028	31/07/2023
Fenpyrazamine	4			31/12/2025	15/01/2025
Ipconazole	3	Yes	Groundwater contaminant	30/11/2025	31/05/2023
Isopyrazam	10	Yes	Carcinogen	31/03/2026	08/06/2022
Mepanipyrim	2	Yes	Carcinogen	30/04/2029	20/05/2024
Metribuzin	25	Yes	EDC, developmental toxin	31/07/2028	24/11/2024
Prochloraz	6		Carcinogen, EDC	31/12/2026	13/12/2021
S-Metolachlor	4		Carcinogen, EDC	31/07/2028	22/01/2024
Spirotetramat	10		Acute toxicity	31/07/2029	30/04/2024

Table 2: Pending approval in EU, approved in GB with products registered

- 3 actives
- 1 HHP

Pesticide active substance	Products registered in GB	HHP?	Human health and/or environmental hazard	GB expiry date	EU expiry date
Cinmethylin	5			02/04/2031	N/A
Isoflucypram	8	Yes	Very persistent in water, soil or sediment, Very toxic to aquatic organisms	03/10/2030	N/A
Pydiflumetofen	10			06/05/2032	N/A

Table 3: Not approved in EU, approved in GB but with no products registered

- 12 actives
- 5 HHPs

Pesticide active substance	Products registered in GB	HHP?	Human health and/or environmental hazard	GB expiry date	EU expiry date
(E,Z)-8-Dodecen-1-yl acetate	0			31/08/2029	31/08/2023
(E,Z)-9-Dodecen-1-yl acetate	0			31/08/2029	31/08/2023
Acibenzolar-S-methyl (benzothiadiazole)	0	Yes	Groundwater contaminant	31/03/2031	10/07/2024

Acrinathrin	0	Yes	Highly bee toxic	31/12/2026	31/12/2021
Benfluralin	0		Carcinogen	28/02/2027	12/02/2023
Bispyribac	0			31/07/2026	31/07/2022
Dodemorph	0			31/08/2025	31/08/2024
Flumetralin	0	Yes		11/12/2025	15/01/2025
Metiram	0	Yes	Carcinogen, EDC, developmental toxin	31/01/2029	28/11/2023
Penflufen	0			31/05/2025	31/01/2024
Pyridalyl	0	Yes	Bio accumulative, Very persistent in water, soil or sediment, Very toxic to aquatic organisms	30/06/2025	30/06/2024
Spiromesifen	0			30/09/2026	30/09/2023

Table 4: Pending in EU, approved in GB with no products registered

- 1 active
- 0 HHPs

Pesticide active substance	Products registered in GB	HHP?	Human health and/or environmental hazard	GB expiry date	EU expiry date
Bixlozone	0			13/06/2031	N/A

2. Maximum Residue Levels (MRLs)

Since 2021, the UK government has been diverging from EU standards to bring GB MRLs into alignment with MRLs set by the Codex Alimentarius. There have been four such announcements, each aligning a tranche of GB MRLs with their Codex equivalents (CXLs).

- [Decision on the adoption of Codex MRLs \(CCPR 2021\)](#) (Came into force: 14 June 2022)
- [Decision on the adoption of Codex MRLs \(CCPR 2022\)](#) (Came into force: 8 December 2023)
- [Decision on the adoption of Codex MRLs \(CCPR 2023\)](#) (Came into force: 19 March 2024)
- [Decision on the adoption of Codex MRLs \(CCPR 2024\)](#) (Came into force: 17 January 2025)

Together, these decisions have resulted in changes to a total of 764 GB MRLs, each an active substance/produce combination (for example, clothianidin in tomatoes).

The weakening of GB MRLs to align with Codex is a threat posed by post-Brexit trade deals which PAN UK has been highlighting to the UK government since 2020. Both the [CPTPP core agreement](#) (Article 7.9.2) and the [UK-Australia FTA](#) (Article 6.6.2) encourage such alignment with “*international standards*”, thereby creating pressure on the UK to move away from the EU’s more precautionary approach.

In September 2024, PAN UK published analysis of the MRL changes which came into force in 2022, 2023 and 2024. We found that safety limits has been weakened for 115 types of produce, mostly fruit and vegetables but also tea, coffee beans and grains such as wheat and rice. Our data spreadsheet can be downloaded [here](#).

In April 2025, we then looked at the latest raft of changes which came into force in January 2025. Table 5 below provides the detail but, in summary, the changes apply to:

- 15 pesticide active substances
- 3 HHPs (clothianidin, isoflucypram and thiamethoxam)
- 87 different types of produce
- MRLs for 139 active substance/produce combinations
- Of the 139 active substance/produce combinations, only seven of the newly adopted GB MRLs align with their EU equivalents.

Table 5: GB MRL changes contained in the HSE’s “Decision on the adoption of Codex MRLs (CCPR 2024)”

Note: Where the ‘Current EU MRL’ column states ‘N/A’ this means that the EU has not set an MRL for that specific active substance/produce combination. In other words, the EU has not established a legally permissible level of that pesticide residue in that particular food item. In essence, it means there is no officially allowed level, and the presence of that pesticide residue is generally not permitted. If an EU MRL is not set, a default MRL of 0.01 mg/kg is applied.

Pesticide active substance	Produce type	Previous GB MRL	Updated GB MRL (after alignment with Codex)	Current EU MRL	HHP?
1,4-dimethylnaphthalene	Swine – fat	0.03	0.03	0.4	No
	Swine – liver	0.3	0.5	1.5	
	Swine – kidney	0.3	0.5	1.5	
	Swine - Edible offals (other than liver and kidney)	0.3	0.5	1.5	
	Bovine – kidney	0.4	0.5	3	
	Goat – kidney	0.4	0.5	3	
	Equine – kidney	0.4	0.5	3	
	Poultry – muscle	0.05	0.06	0.2	
	Poultry – fats	0.15	0.3	0.7	
	Poultry – liver	0.15	0.2	0.6	
	Poultry – kidney	0.03	0.2	0.7	
	Poultry – edible offals (other than liver and kidney)	0.15	0.2	0.7	
	Other farmed terrestrial animals - kidney	0.4	0.5	3	
	Birds eggs	0.03	0.03	0.15	
Acetamiprid	Soyabeans	0.01	0.01	0.01	No
Boscalid	Granate apples/pomegranates	0.01	2	2	No

Clothianidin	Tomatoes (excluding gojiberries/wolfberries)	0.04	0.05	0.04 (0.01 from March 2026)	Yes
	Gojiberries/wolfberries	0.04	0.06	0.04	
	Sweet peppers/bell peppers	0.04	0.05	0.04	
	Aubergines/eggplants	0.04	0.05	0.04	
	Okra/lady's fingers	0.01	0.05	0.01	
	Other fruiting vegetables	0.01	0.05	0.01	
	Cardoons	0.01	0.04	0.01	
	Florence fennels	0.01	0.04	0.01	
	Rhubarbs	0.01	0.04	0.01	
	Hibiscus	0.05	0.05	0.05	
	Cumin seed	0.05	1	0.05	
Cyantraniliprole	Avocados	0.01	0.4	0.01	No
	Beans	0.3	0.6	0.3	
	Lentils	0.01	0.6	0.01	
	Peas	0.01	0.6	0.01	
	Lupins	0.01	0.6	0.01	
	Soyabeans	0.4	0.6	0.4	
	Teas	0.05	50	0.05	
	Birds eggs	0.15	0.3	0.15	
Cyflumetofen	Cherries (sweet)	0.01	0.4	0.01	No
Imazapyr	Rice	0.01	0.07	N/A	No
	Wheat	0.05	0.6	0.05	
Isocycloseram	Grapefruits	0.01	0.3	N/A	No
	Oranges	0.01	0.4	N/A	
	Lemons	0.01	0.5	N/A	
	Limes	0.01	0.5	N/A	
	Mandarins	0.01	0.4	N/A	
	Pome fruits	0.01	0.4	N/A	
	Apricots	0.01	0.3	N/A	
	Cherries (sweet)	0.01	1	N/A	
	Peaches	0.01	0.3	N/A	
	Plums	0.01	0.4	N/A	
	Kumquats	0.01	0.5	N/A	
	Potatoes	0.01	0.01	N/A	
	Onions	0.01	0.01	N/A	
	Tomatoes	0.01	0.5	N/A	
	Sweet peppers/bell peppers	0.01	0.6	N/A	
	Aubergines/eggplants	0.01	0.3	N/A	
	Cucumbers	0.01	0.1	N/A	
	Courgettes	0.01	0.09	N/A	
	Melons	0.01	0.15	N/A	

	Broccoli	0.01	0.7	N/A	
	Cauliflowers	0.01	0.5	N/A	
	Brussels sprouts	0.01	2	N/A	
	Head cabbages	0.01	4	N/A	
	Soyabeans	0.01	0.15	N/A	
	Cotton seeds	0.01	0.5	N/A	
	Maize/Corn	0.01	0.01	N/A	
	Swine - Muscle	0.01	0.02	N/A	
	Swine - Fat	0.01	0.4	N/A	
	Swine - Liver	0.01	0.3	N/A	
	Swine - Kidney	0.01	0.3	N/A	
	Swine - Edible offals (other than liver and kidney)	0.01	0.3	N/A	
	Bovine - Muscle	0.01	0.02	N/A	
	Bovine - Fat	0.01	0.4	N/A	
	Bovine - Liver	0.01	0.3	N/A	
	Bovine - Kidney	0.01	0.3	N/A	
	Bovine - Edible offals (other than liver and kidney)	0.01	0.3	N/A	
	Sheep - Muscle	0.01	0.02	N/A	
	Sheep - Fat	0.01	0.4	N/A	
	Sheep - Liver	0.01	0.3	N/A	
	Sheep - Kidney	0.01	0.3	N/A	
	Sheep - Edible offals (other than liver and kidney)	0.01	0.3	N/A	
	Goat - Muscle	0.01	0.02	N/A	
	Goat - Fat	0.01	0.4	N/A	
	Goat - Liver	0.01	0.3	N/A	
	Goat - Kidney	0.01	0.3	N/A	
	Goat - Edible offals (other than liver and kidney)	0.01	0.3	N/A	
	Equine - Muscle	0.01	0.02	N/A	
	Equine - Fat	0.01	0.4	N/A	
	Equine - Liver	0.01	0.3	N/A	
	Equine - Kidney	0.01	0.3	N/A	
	Equine - Edible offals (other than liver and kidney)	0.01	0.3	N/A	
	Other farmed terrestrial animals - muscle	0.01	0.02	N/A	
	other farmed terrestrial animals - fat	0.01	0.4	N/A	
	other farmed terrestrial animals - liver	0.01	0.3	N/A	

	other farmed terrestrial animals - kidney	0.01	0.3	N/A	
	other farmed terrestrial animals - Edible offals (other than liver and kidney)	0.01	0.3	N/A	
	Milk	0.01	0.05	N/A	
Isoflucypram	Barley	0.06	0.1	N/A	YES
	Wheat	0.015	0.05	N/A	
Isotianil	Lemons	0.4	0.5	N/A	NO
	Limes	0.4	0.5	N/A	
	Kumquats	0.01	0.5	N/A	
Mepiquat chloride	Grapes	0.02	6	0.02	NO
	Cotton seeds	0.05	6	6	
	Swine - Edible offals (other than liver and kidney)	0.05	0.06	0.05	
Oxathiapiprolin	Currants (black, red and white)	0.01	0.5	0.01	NO
	Gooseberries (green, red and yellow)	0.01	0.5	0.01	
	Rose hips	0.01	0.5	0.01	
	Avocados	0.01	0.07	0.01	
	Hops	0.05	5	8	
Tetraniliprole	Mandarins	1	1.5	N/A	NO
Thiamethoxam	Onions	0.01	0.02	0.01	YES
	Tomatoes (excluding gojiberries/wolfberries)	0.2	0.7	0.2	
	Gojiberries/wolfberries	0.2	1.5	0.2	
	Aubergines/eggplants	0.2	0.7	0.2	
	Okra/lady's fingers	0.01	0.7	0.01	
	Other fruiting vegetables	0.01	0.7	0.01	
	Cardoons	0.01	0.8	0.01	
	Florence fennels	0.01	0.8	0.01	
	Rhubarbs	0.01	0.8	0.01	
	Hibiscus/ roselle	0.05	0.7	0.05	
	Cumin seed	0.05	1	0.05	
Tricyclazole	Rice	0.09	0.3	0.01	NO
	Swine - Liver	0.01	0.1	0.01	
	Swine - Kidney	0.01	0.1	0.01	
	Swine - Edible offals (other than liver and kidney)	0.01	0.1	0.01	
	Bovine - Liver	0.01	0.1	0.01	
	Bovine - Kidney	0.01	0.1	0.01	

	Bovine - Edible offals (other than liver and kidney)	0.01	0.1	0.01	
	Sheep - Liver	0.01	0.1	0.01	
	Sheep - Kidney	0.01	0.1	0.01	
	Sheep - Edible offals (other than liver and kidney)	0.01	0.1	0.01	
	Goat - Liver	0.01	0.1	0.01	
	Goat - Kidney	0.01	0.1	0.01	
	Goat - Edible offals (other than liver and kidney)	0.01	0.1	0.01	
	Equine - Liver	0.01	0.1	0.01	
	Equine - Kidney	0.01	0.1	0.01	
	Equine - Edible offals (other than liver and kidney)	0.01	0.1	0.01	
	other farmed terrestrial animals - Liver	0.01	0.1	0.01	
	terrestrial animals - Kidney	0.01	0.1	0.01	
	other farmed terrestrial animals - Edible offals (other than liver and kidney)	0.01	0.1	0.01	