

## 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](mailto:josie@pan-uk.org) and UK Policy Manager Nick Mole at [nick@pan-uk.org](mailto: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<br>(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<br>(other than liver and<br>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<br>(other than liver and<br>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<br>(other than liver and<br>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<br>(other than liver and<br>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<br>(other than liver and<br>kidney) | 0.01 | 0.3  | N/A |  |
|  | Other farmed terrestrial<br>animals - muscle               | 0.01 | 0.02 | N/A |  |
|  | other farmed terrestrial<br>animals - fat                  | 0.01 | 0.4  | N/A |  |
|  | other farmed terrestrial<br>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    |     |
| Tetranilprole     | 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<br>(other than liver and<br>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<br>(other than liver and<br>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<br>(other than liver and<br>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<br>(other than liver and<br>kidney)                              | 0.01 | 0.1 | 0.01 |  |
|  | other farmed terrestrial<br>animals - Liver   | 0.01 | 0.1 | 0.01 |  |
|  | terrestrial animals -<br>Kidney   | 0.01 | 0.1 | 0.01 |  |
|  | other farmed terrestrial<br>animals - Edible offals<br>(other than liver and<br>kidney) | 0.01 | 0.1 | 0.01 |  |