



Make mirror measures a priority for the next European cycle (2024-2029)

As highlighted in the EU strategic agenda, "our natural environment is facing increasing damage and disruption due to climate change, biodiversity loss and pollution." In response to this challenge, our organisations are working to transform our food and farming systems to make them more sustainable, fair and remunerative. While the reform of the Common Agricultural Policy is the main lever for achieving this, the EU's trade policy must also contribute to it. Proper coordination of these different public policies should make it possible to implement the EU's international environmental commitments set out in the EU Green Deal and the F2F strategy, while mitigating negative impacts.

A number of European standards, particularly those relating to the safety of goods, apply to all goods sold on the EU market, regardless of their origin. But **imported products are not subject – apart from a few exceptions – to the European sanitary, environmental, and social production standards that European producers must comply with. This regulatory gap is widening as EU standards are gradually tightened in the framework of the EU Green Deal for instance.** At the same time, trade agreements promote trade liberalisation of almost all goods and services without taking account of this divergence in production standards. **This situation was widely denounced by farmers during the protests at the beginning of 2024.**

In the agricultural system, this double standard raises at least a triple issue, undermining the:

- **Integrity of our environmental commitments** (generating environmental and health impacts for producers, local populations, and ecosystems in third countries)
- **Consumers' trust in the food system**
- **Equity of rules for farmers**

This system of double standards increases the risk of eroding our current standards and hinders their strengthening, in line with the objectives of the Green Deal. This situation also contributes to locking the EU into unsustainable practices by relying on certain imports, such as soy, to maintain the industrial part of the meat and dairy industry and outsourcing the environmental and health effects of its production system to third countries.

Implementing mirror measures would enable the EU to make its agricultural sector more sustainable, better protect public health, and the environment, while promoting fair competition between European and international producers.

The term '**mirror measures**' refers to unilateral measures incorporated into European legislation which make access to the EU market conditional on compliance with certain core European standards, particularly in the areas of sustainability, the environment, health and animal welfare. These measures would apply to every imported good entering the EU market, regardless of the existence of a trade agreement. Isolated examples of such measures have existed for a long time, mainly in the agricultural sector, for instance on hormone beef or organic food.

During the 2019-2024 mandate, the EU began addressing the environmental impacts of its consumption in third countries with the adoption in 2023 of the Carbon Border Adjustment Mechanism (Regulation (EU) 2023/956), the Regulation on deforestation-free products (Regulation (EU) 2023/1115), and the Regulation on residues of two neonicotinoids (Regulation (EC) 2023/334).

It must now apply those regulations without delay, close the loopholes they contain and continue to reform its trade policy and tackle regulatory divergence. In future, decision makers should systematically consider including provisions on the treatment of imported and exported goods in all landmark EU legislation. This will be necessary, in particular, for the success of the Green Deal and its acceptance by businesses and farmers.

RECOMMENDATIONS :

On process :

- Inscribe the adoption and implementation of effective mirror measures in key proposals put forward by Member States in the Council and newly elected MEPs for the next EU cycle and in the portfolio of future relevant commissioners.
- Generalize the principle of mirror measures by adopting a European Regulation on mitigation of environmental and health impacts associated with food imported to the EU.
- Adopt a mirror measures reflex: systematically consider including provisions on the treatment of imported and exported goods in all landmark EU legislation, at every stage, particularly in impact studies, consultations or when drafting legislative proposals.

- Ensure that the design and implementation of mirror measures do not burden vulnerable countries and producers in international value chains. The EU should:
 - Assess the costs and requirements of compliance with EU rules for countries with significant volumes of smallholder production destined for the EU market.
 - Analyse the value distribution in these chains and the scope for increasing production standards and remuneration for producers.
 - Ensure smallholder farmers receive adequate technical and financial support to comply with the new European rules.
 - Take concrete steps to ensure that these farmers are guaranteed a decent income, for example by including the issue of decent income and purchasing practices in trade agreements, or in the national implementation of the EU Corporate Sustainability Due Diligence Directive.
- Strengthen the resources and capabilities of customs, veterinary, and phytosanitary authorities regarding all these new import requirements and develop customs nomenclature to differentiate products according to their production methods, for example organically-farmed products.
- Oppose trade agreements that do not meet core environmental, social and animal welfare standards and encourage the exchange of products harmful to the environment, climate, and health.
- Promote the definition of more ambitious international standards on these issues, in particular by including the objective of environmental protection in the mandate of the Codex Alimentarius.

Content :

- End import tolerances for all banned pesticides; lower the Maximum Residue Limits (MRLs) to the detection threshold and extend the use of MRLs to all agricultural production (including crops intended solely for animal feed, energy or ornamental use); amend regulation EC 396/2005 on MRLs or adopt a specific new one to cover pesticides banned for environmental reasons.
- Ban the importation of products treated with banned pesticides in the EU. At first, the ban should focus on the most hazardous pesticides (The criteria used could include classification into a certain category and the severity of impacts generated by EU consumption based on sectors according to import volumes and quantities of substances used). Then, the ban could apply to all banned pesticides within the EU.

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- Ban the export of pesticides and substances prohibited for use within the EU to third countries.
- Implement the ban on the importation of meat from animals that have been treated with or fed on substances banned in the EU (growth-promoting antibiotics, animal meal).
- Implement the objective of "zero products from imported deforestation" by strengthening the Regulation on deforestation-free products concerning the covered areas (including wooded lands in order to protect peatlands and forested savannahs) and products (such as sugar cane, maize, cotton...).
- Require adherence to standards equivalent to those in force in the EU for animal agriculture in third countries, particularly regarding breeding conditions, transport, and traceability.

Contacts :

Amaury Ghijselings, Advocacy officer, CNCD-11.11.11, Amaury.Ghijselings@cncd.be

Maximilian Herzog, EU Advocacy officer, Feedback EU, maximilian@feedbackglobal.org

Enzo Armaroli, Advocacy Officer, Foundation for Nature and Mankind, e.armaroli@fnh.org

Jonas Jaccard, Policy officer, Humundi, jja@humundi.org

Giulia Gouet, Policy Officer, Slow Food, g.gouet@slowfood.it

Sharon Sheets, Project & Communications Manager, Slow Food Deutschland, s.sheets@slowfood.de

Stéphanie Kpenou, Advocacy officer, Veblen Institute, kpenou@veblen-institute.org