



To the attention of the representatives of the Members States of the Working Group
on Industrial and Environmental Contaminants

Subject: Information request on SCoPAFF Working Groups

Dear Sir or Madam,

On November 25th, 2025, the Working Group on Industrial and Environmental Contaminants of the Standing Committee on Plants, Animals, Food and Feed (SCoPAFF) will meet to discuss, among other things, the establishment of a maximum limit for mercury in canned fish. If we welcome the fact that this topic is on the agenda, we contest the lack of transparency surrounding these discussions, and the ones of all other SCoPAFF working groups, which directly concern the health of European citizens. We, BLOOM, CEO, EEB, Générations Futures, PAN Europe, POLLINIS and WECF, NGOs working on health and environmental issues ask for transparency regarding SCoPAFF working group meetings.

It is during the closed-door meetings of the SCoPAFF working groups that decisions are made on matters of utter importance such as:

- the maximum limit for mercury in tuna;
- the maximum limit for cadmium in cocoa;
- the maximum residue level for pesticides on foodstuffs and animal feed of plant and animal origin;
- the maximum mortality rate for honey bees for each use of pesticides;
- the maximum limit for PFAS in food.

Yet, investigations have proven the influence of industrial lobbies on European health standards established within SCoPAFF working groups like the one you are a part of. In October 2024, French NGO BLOOM brought to light the influence of fish industry lobbies on the establishment of mercury limits at the international and European levels [1]. In February 2020, the Corporate Europe Observatory demonstrated how pesticides corporations and trade partners have put immense pressure on the EU to allow residues of certain hazardous pesticides to be present in food and feed imports [2]. In June 2024, POLLINIS revealed how the agrochemical industry had influenced the negotiations surrounding the 2013 Bee Guidance Document, a document aimed at updating obsolete testing protocols to evaluate the risk of pesticides on bees [3]. Even more recently, on November 10th, 2025, French journalist Hugo Clément

exposed how back in 2012, Gordon Bacon, former head of the lentil lobby in Canada, supported by Monsanto, allegedly lobbied European institutions to increase the maximum residue limit for glyphosate in lentils by a factor of 100, from 0.1 mg/kg to 10 mg/kg [4].

There is no shortage of examples illustrating how European health standards are influenced by industry lobbies and how they systematically put economic interests ahead of consumer health, as evidenced by the As Low As Reasonably Achievable (ALARA) method to establish maximum limits in food and feed.

We call on Member State representatives like you to adopt positions at SCoPAFF Working Groups that put the health of European citizens before the profits of industries. It is necessary to reject standard-setting methods that favour short-term economic interests over the protection of our health and our environment.

The upcoming Working Group on Industrial and Environmental Contaminants' on November 25th, 2025, will be a great opportunity for that. It will deal in particular with the establishment of a maximum limit for mercury in canned tuna. Mercury is an extremely dangerous poison, present in most tuna-based products intended for consumption, and the European regulatory standard doesn't sufficiently protect consumer health. The actual maximal limit for mercury in fresh tuna of 1 mg/kg has been established to ensure that 95% of the product can be sold, without considering any health aspects and there is no threshold for canned tuna (ALARA method). This explains why tuna, one of the most contaminated fish species, has a maximum mercury limit three times higher than that of the least contaminated species. At this threshold, both children and adults, including pregnant and breastfeeding women, up to 76 kg would exceed the Tolerable Weekly Intake (TWI) by eating only one 100g portion of tuna contaminated with 1 mg/kg in one week. That is why BLOOM and Foodwatch France are calling for these limits to be set at 0.3 mg/kg, which is the strictest limit currently in place at EU level for other fish species.

We call on you to ensure the real protection of consumers and provide greater transparency regarding the evolution of SCoPAFF Working Group discussions to civil society. To that end, the agenda and report of the meetings should be made available to the public as well as the names and affiliation of participants and their position, starting with the next SCoPAFF Working Group meeting discussing tuna mercury maximum limits.

We thank you in advance for your consideration and support.

Looking forward to hearing from you soon,

Signatories of the letter:

Camille Schuster, mercury campaigner at BLOOM

Yoann Coulmont, campaigner at Générations Futures

Mathis Buis, campaigner at POLLINIS

Hans van Scharen, researcher & campaigner at Corporate Europe Observatory (CEO)

Raphaëlle Catté, policy officer at the European Environmental Bureau

Barbara Berardi, senior policy officer at Pesticide Action Network - Europe

Sylvie Platel, campaigner at WECF, on behalf Véronique Moreira, president

[1] : [Toxic Tuna](#), BLOOM

[2] : [Toxic residues through the back door](#), Corporate Europe Observatory

[3] : [Qu'est-ce que le SCoPAFF, terrain de jeu idéal de l'agrochimie en Europe ?](#), POLLINIS

[4] : [Sur le front — Libre-échange : c'est notre nourriture qui trinque](#), France TV

[5]: <https://www.zeromercury.org/about-mercury/mercury-in-nature/>, European Environmental Bureau