Report on the exchange of information under the PIC Regulation in 2024-2025

Compilation of information transmitted by the European Commission, Member States and ECHA under Article 20 of the PIC Regulation

November 2026

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Summary

This report provides an overview of the information exchanged under Article 20 of the PIC Regulation during the 2024-2025 reporting period.

Overall, the reporting period was characterised by increased export notification activity, an expansion in the number of chemicals covered by the PIC Regulation, and a stable number of non-EU countries receiving export notifications.

PIC activities continued to grow.

During the 2024-2025 reporting period, the European Union recorded an increase in activities under the Prior Informed Consent (PIC) Regulation. **Export notifications transmitted** (Section 1: Information submitted through export notifications to Parties to the Rotterdam Convention or other countries) from the EU to non-EU countries rose from **9,594 in 2024** to **10,341 in 2025**, reflecting sustained growth compared with two previous reporting years. With 10,341 export notifications, 2025 represents the highest annual number of export notifications during the last four years.

Export notifications transmitted per year

2022	2023	2024	2025
9 414	9 277	9 594	10 341

Expanding scope of regulated chemicals contributed to increased notifications.

Amendments to Annex I to the PIC Regulation have increased the number of chemicals subject to PIC and thereby the range of chemicals covered by export notifications has also been expanding over the time. Two amendments[1] affected the 2024 – 2025 reporting period, extending scope of chemicals notified. The export notifications covered **132 PIC chemicals in 2024 and rose to 148 in 2025**. As a result, the number of export notifications submitted increased during the reporting period.

Following the inclusion of chemicals in part 2 of Annex I to the PIC Regulation, the Union submitted **14 new notifications for final regulatory actions (FRA**) (Section 2: Information made available through Union notifications of final regulatory action (FRA) under the Rotterdam Convention) to the Rotterdam Convention over the reporting period for 2024 - 2025. Fifteen FRAs were submitted during the previous reporting period for 2022 – 2023. The level of FRA activity therefore remained broadly comparable with the previous reporting period.

Global reach remained stable.

The Union transmitted export notifications to 152 non-EU countries in both reporting years 2024 and 2025, remaining broadly stable in comparison to past years (150 countries in 2023 and 153 countries in 2022).

[1] Commission Delegated Regulation (EU) 3199 of 15 October 2024 and Commission Delegated Regulation (EU) 1656 of 16 June 2023 amending Regulation (EU) No 649/2012 of the European Parliament and of the Council as regards the listing of pesticides and industrial chemicals

The Union **provided 26 explicit consent responses** to non-EU countries (Section 3: Information submitted through explicit consent responses to the Parties to the Rotterdam Convention or other countries) during the reporting period, while nine such responses were given in the previous reporting period. Most of these requests however originated from the United Kingdom, which remained the principal source of explicit consent requests.

As in previous years, the Union responded to a **small number of ad hoc questions** from authorities in the importing countries concerning the traded chemicals
(Section 4: Information provided *following ad* hoc requests).

Introduction

The European Chemicals Agency (ECHA), every two years, prepares a report on the exchange of information in accordance with Article 20(4) of the Prior Informed Consent (PIC) Regulation (Regulation (EU) No 649/2012 of the European Parliament and of the Council of 4 July 2012 concerning the export and import of hazardous chemicals).

Since the adoption of the PIC Regulation, this is the sixth report and covers the period from 1 January 2024 to 31 December 2025.

The PIC Regulation governs the export and import of certain hazardous chemicals between the European Union and non-EU countries, placing obligations mainly on companies that want to export these chemicals. The main objectives are to:

- implement the "Rotterdam Convention on the prior informed procedure for certain hazardous chemicals and pesticides in international trade" within the EU;
- promote shared responsibility and cooperation in the international trade of hazardous chemicals; and
- contribute to the environmentally sound use of hazardous chemicals.

To meet these objectives, the Regulation requires exchange of information concerning the characteristics of hazardous chemicals exported from the EU, and on how to safely store, transport, use and dispose of them in importing countries.

Article 20(1) of the PIC Regulation establishes the following:

The Commission, assisted by the Agency, and the Member States shall, as appropriate, facilitate the provision of scientific, technical, economic and legal information concerning chemicals subject to this Regulation, including toxicological, ecotoxicological and safety information.

The Commission, with the support of the Member States and the Agency as necessary, shall, as appropriate, ensure the following:

(a) the provision of publicly available information concerning regulatory actions relevant to the objectives of the Convention;

(b) the provision of information for Parties and other countries directly or through the Secretariat concerning those actions which substantially restrict one or more uses of a chemical.

This report provides an overview of four main types of information transmitted by the Union to the authorities of non-EU countries:

- Information submitted through export notifications to Parties to the Rotterdam Convention or other countries (Section 1).
- Information made available through Union notifications of final regulatory action under the Rotterdam Convention (Section 2).
- Information submitted in explicit consent responses to Parties to the Rotterdam Convention or other countries (Section 3).
- Information provided following *ad hoc* requests (Section 4).

ECHA also publishes information on all substances listed under the PIC Regulation (PIC chemicals) on its website at: https://echa.europa.eu/information-on-chemicals.

The following sections provide detailed information on the activities carried out during the 2024-2025 reporting period under each of these information exchange mechanisms.

Section 1: Information submitted through export notifications to Parties to the Rotterdam Convention or other countries

Under Article 8 of the PIC Regulation, exporters intending to export a chemical listed in Part 1 of Annex I must notify the designated national authority of the Member State where they are established (the "exporter's Member State").

The designated national authority of the exporter's Member State verifies the information and, once the notification is complete, forwards it to ECHA.

ECHA sends the export notification on behalf of the Commission to the designated national authority of the importing country no later than 15 days before the first intended export of the chemical in each calendar year.

Total number of export notifications submitted to non-EU countries, per Annex I chemical and per year, during the reporting period:

Chemical name	Number of export notifications sent[2]	
	2024	2025
1,1,2,2-Tetrachloroethane	11	12
1,1,2-Trichloroethane	2	1
1,1-Dichloroethene	5	7
1,2-dibromoethane (EDB)	8	7
1,3-dichloropropene	53	57
1-bromopropane (n-propyl bromide)	2	2
2-aminobutane	1	2
4,4'-Diaminodiphenylmethane (MDA)	5	6
Abamectin; Avermectin B1a (purity ≥80 %)		172
Acetochlor	2	1
Acifluorfen	2	2
Alpha-cypermethrin	151	115
Ametryn		1
Amitraz	3	2

[2] This counts the number of export notifications with an export date in the reporting period that have been forwarded to importing countries. If one export notification for a mixture covers more than one PIC chemical, the forwarding is counted once for each PIC substance that the mixture contains.

Chemical name	Number of export notifications sent[2]	
	2024	2025
Amitrole	1	6
Anthraquinone	4	4
Arsenic compounds	41	54
Asulam	4	4
Atrazine	3	6
Azimsulfuron	2	2
Benalaxyl	1	
Bendiocarb		8
Benfluralin		1
Benzene	211	75
Benzene as a constituent of other substances in concentrations equal to, or greater than 0,1 % by weight	58	19
Benzidine, its salts and benzidine derivatives	12	13
Benzyl butyl phthalate		7
Beta-cyfluthrin	12	12
Beta-cypermethrin	2	2
Bifenthrin	10	7
Bromadiolone	171	228
Bromoxynil and its butyryl, heptanoyl and octanoyl esters	7	4
Cadmium and its compounds	113	105
Cadusafos		1
Carbaryl	2	1
Carbendazim	138	177
Carbon tetrachloride	3	7
Carboxin	2	2

Chemical name	Number of export notifications sent[2]	
	2024	2025
Chlorate	210	299
Chlorfenapyr	16	18
Chlorfenvinphos	5	6
Chloroform	216	248
Chlorophene	22	16
Chloropicrin	34	36
Chlorothalonil	71	62
Chlorpropham	8	7
Chlorpyrifos	35	27
Chlorpyrifos-methyl	2	1
Cholecalciferol	7	6
Clothianidin	83	71
Creosote and Creosote related substances	65	50
Cyanamide	51	63
Cyfluthrin	17	16
Cyproconazole	69	58
d-Allethrin		17
Desmedipham	15	15
Diazinon	14	9
Dibutyltin compounds	1125	1246
Dichlobenil	5	6
Dichlorvos	1	
Didecyldimethylammonium chloride	1278	1221
Difenacoum		89
Dimethoate	33	25
Dimethomorph		94
Dimoxystrobin		6

Chemical name	Number of export notifications sent[2]	
	2024	2025
Dioctyltin compounds	546	678
Diphenylamine	170	235
Diquat, including diquat dibromide	28	24
Diuron	256	324
Empenthrin	6	5
Epoxiconazole	70	59
Esbiothrin	12	15
Ethalfluralin	4	4
Ethametsulfuron-methyl	3	4
Ethoxysulfuron	9	9
Ethylene dichloride (1,2-dichloroethane)	44	53
Ethylene oxide	66	61
Famoxadone	26	25
Fenamiphos	1	
Fenbuconazole	2	
Fenbutatin oxide	1	
Fenitrothion	1	
Fenoxycarb	14	17
Fenpropathrin		1
Fenpropimorph		22
Ferbam	57	56
Fipronil	109	101
Flufenoxuron	2	2
Flurtamone	2	2
Glufosinate, including glufosinate-ammonium	30	29
Hexachloroethane	2	1

Chemical name	Number of export notifications sent[2]	
	2024	2025
Imidacloprid	430	417
Indoxacarb	57	39
Ipconazole (Group)		5
Iprodione	16	14
Isoproturon	4	6
Isopyrazam	2	2
Lead	113	114
Lead compounds	229	225
Lufenuron	52	59
Malathion	39	37
Mancozeb	190	204
Mercury	1	1
Mercury compounds, including inorganic mercury compounds, alkyl mercury compounds and alkyloxyalkyl and aryl mercury compounds	88	160
Metam-sodium	40	42
Methomyl	1	
Methyl bromide	4	2
Metiram		48
Molinate		2
Monuron	32	50
Myclobutanil	15	12
Nicotine	89	75
Nonylphenol ethoxylates (C2H4O)nC15H24O	109	97
Nonylphenols C6H4(OH)C9H19	420	349
Orthosulfamuron	1	1
Oxadiazon		2
Paraquat	1	1

Chemical name	Number of export notifications sent[2]	
	2024	2025
Pencycuron	6	5
Penflufen		21
Permethrin	539	554
Phosmet	6	8
Picoxystrobin	17	20
Polybrominated biphenyls (PBB) except hexabromo-biphenyl	3	1
Prochloraz	5	12
Profenofos		1
Profoxydim	16	12
Propanil	1	1
Propargite	10	3
Propiconazole	178	159
Propineb (polymeric zinc propylenebis(dithiocarbamate))	29	31
Propisochlor	13	7
Pymetrozine	5	5
Silver sodium hydrogen zirconium phosphate		3
Simazine	1	
S-metolachlor		55
Sodium perborate, perboric acid, sodium salt		26
Spirodiclofen	5	7
Spirotetramat		55
Strychnine		1
Tetraethyl lead	21	20
Thallium sulphate	8	14
Thiacloprid	42	41

Chemical name	Number of export notifications sent[2]	
	2024	2025
Thiamethoxam	322	287
Thiophanate-methyl	41	27
Thiram	156	130
Triadimenol		2
Triasulfuron	15	14
Tributyltin Compounds	11	6
Trichlorobenzene	33	27
Triclosan	1	
Tricyclazole	9	1
Triflumuron	17	14
Trifluralin	6	5
Triflusulfuron-methyl		11
Triorganostannic compounds other than tributyltin compounds	4	6
Warfarin	5	4
Zineb	251	210
Total number of export notifications sent to non-EU countries[3]:	**9 594**	**10 341**

[3] If one export notification for a mixture covers more than one PIC chemical, the forwarding is counted once for each PIC chemical that the mixture contains.

The total number of PIC chemicals for which at least one export notification was sent:

Year	Number of PIC chemicals
2024	132
2025	148

The total number of non-EU countries that received the above-mentioned export notifications:

Year	Number of countries
2024	152
2025	152

Non-confidential information on all validated export notifications made under the PIC Regulation is publicly available on ECHA's website: https://echa.europa.eu/information-on-chemicals/pic/export-notifications.

Overall, export notification activity continued at a high level during the reporting period, reflecting both the broad geographical coverage of the PIC Regulation and the expanding number of chemicals subject to notification requirements.

Section 2: Information made available through Union notifications of final regulatory action (FRA) under the Rotterdam Convention

Under Article 11 of the PIC Regulation, the Commission shall notify the Secretariat of the Rotterdam Convention of final regulatory action (FRA) to ban or severely restrict chemicals listed in Part 2 of Annex I, which qualify for PIC notification. ECHA assists the Commission in compiling the FRA notifications.

During the reporting period, the Union submitted the following 14 FRA notifications to the Rotterdam Convention Secretariat:

Chemical	Use category	FRA	Date published
Glufosinate	Pesticide	Banned	December 2024
Maneb	Pesticide	Banned	December 2024
Pencycuron	Pesticide	Banned	December 2024
Fipronil	Pesticide	Banned	December 2024
Dichlorvos	Pesticide	Banned	December 2024
2-Naphthoxyacetic acid	Pesticide	Banned	June 2024
Chlorophene	Pesticide	Banned	June 2024
Esbiothrin	Pesticide	Banned	June 2024
Isopyrazam	Pesticide	Banned	June 2024
Phosmet	Pesticide	Banned	June 2024
triflumuron	Pesticide	Banned	June 2024
beta-cyfluthrin	Pesticide	Banned	June 2024
Famoxadone	Pesticide	Banned	June 2024
Indoxacarb	Pesticide	Severely Restricted	June 2024

Summaries of the FRA notifications, as published on the website of the Rotterdam Convention can be found at the following link: FRA Database.

The detailed information provided as part of a FRA notification is described in Annex IV to the PIC Regulation, as well as in the form to be filled in for the purposes of notifying a FRA to the Rotterdam Convention Secretariat, available at: Notification of Final Regulatory Action form.

Section 3: Information submitted through explicit consent responses to the Parties to the Rotterdam Convention or other countries

Regulation (EU) No 649/2012 does not set specific rules for cases where a non-EU exporting country requests the explicit consent for the export of a chemical to the Union. As agreed at the 26th meeting of the designated national authorities, the Commission, acting as the Designated Authority of the Union, prepares a reply to such requests, which is in principle valid for the whole Union. Assisted by the Agency, the Commission analyses the chemical's legal status and drafts a reply based on Union law. After considering comments from the Member States, the Commission finalises the reply, sends it to the exporting non-EU country and provides a copy to ECHA.

During the reporting period, the Union submitted 26 responses to explicit consent requests from parties to the Rotterdam Convention or other countries, as outlined in the table below.

Chemical	Exporting country	Number of requests covered	Date of the response
Dinoseb	United Kingdom	1	26/04/2024
Nonylphenol ethoxylates (C2H4O)nC15H24O	United Kingdom	1	26/04/2024
1,2-dibromoethane (EDB), tetraethyl lead	United Kingdom	1	26/04/2024
Ethylene oxide	United Kingdom	1	26/04/2024
1,2-dibromoethane (EDB)	United Kingdom	1	26/04/2024
Mercury(I) nitrate dihydrate	United Kingdom	1	23/05/2024
Diphenylamine	United Kingdom	1	23/05/2024
Nonylphenols C6H4(OH)C9H19	United Kingdom	1	23/05/2024
Chlorothalonil	United Kingdom	1	23/05/2024
Nicotine	United Kingdom	2	23/05/2024
PBB; 4-bromobiphenyl	United Kingdom	1	23/05/2024
PBB; 2,2'-Dibromobiphenyl	United Kingdom	1	23/05/2024
Indolylacetic Acid	United Kingdom	1	23/05/2024
Tributyltin compounds; tri-n-butyltin methanolate	United Kingdom	1	23/05/2024

Chemical	Exporting country	Number of requests covered	Date of the response
Tributyltin compounds; hexabutyldistannane	United Kingdom	1	23/05/2024
Ethylene dichloride (1,2-dichloroethane)	United Kingdom	3	18/12/2024
Asulam; sodium methyl [(4-aminophenyl)sulphonyl]carbamate	United Kingdom	1	18/12/2024
Thiamethoxam	United Kingdom	4	18/12/2024
Diquat dibromide	United Kingdom	1	26/02/2025
Thiram	United Kingdom	7	26/02/2025
Chlorate (potassium chlorate)	United Kingdom	2	26/02/2025
Chlorate (sodium chlorate)	United Kingdom	1	26/02/2025
Mercury (II) Sulphate	United Kingdom	1	27/06/2025
Mercury (II) Chloride	United Kingdom	1	27/06/2025
Propanil	United Kingdom	1	19/05/2025
Chlorate (sodium chlorate)	Serbia	1	23/04/2025

The majority of requests originated from the United Kingdom, which remained the main source of explicit consent requests during the reporting period.

Section 4: Information provided following *ad hoc* requests

In addition to requests for clarification, or additional information which directly relates to specific export notifications that are transmitted, the authorities of importing countries, as well as some regional or international organisations, address *ad hoc* requests to the Commission, ECHA or Union Member State authorities.

During the reporting period, a total of 10 *ad hoc* information requests were received.

4.1 No *ad hoc* requests received by the Commission

According to the information provided to ECHA, the European Commission did not receive any *ad hoc* requests falling within in the scope of Article 20 of the PIC Regulation during the reporting period.

4.2 No *ad hoc* requests received by Union Member States

According to the information provided to ECHA, none of the Union Member States received any *ad hoc* requests falling within the scope of Article 20 of the PIC Regulation during the reporting period.

4.3 Ten *ad hoc* requests received by ECHA

During the reporting period, ECHA received the following 10 *ad hoc* requests along with follow-ups, from five authorities of non-EU importing countries:

4.3.1 Enquiry on restrictions on cinnabarite ore (Montenegro)

4.3.2 Request to clarify the timeline of the export notification process (Iceland)

4.3.3 Request to clarify why consent is requested when an acknowledgement of receipt was sent for a similar export (Kenya)

4.3.4 Requesting a list of the chemicals that require export notification (Andorra)

4.3.5 Request to clarify why explicit consent was asked of substance not in Annex III of Rotterdam Convention (Peru)

4.3.6 Request for advice on pesticides imported into Costa Rica under a special customs regime (Costa Rica)

4.3.7 Question on which regulations are relevant for sodium cyanide (Kenya)

4.3.8 Request to clarify how the explicit consents are recorded and applied in the Union (Canada)

4.3.9 Request to clarify whether the sunset date for the use of tetraethyl lead affects the overseas territories of Union Member States (Australia)

4.3.10 Question on how pesticides are produced in the Union if the active substances are banned on its territory (Azerbaijan)

Further details about the requests and the responses provided by ECHA, are available in Appendix 1 to this report.

The requests received covered a diverse range of procedural and regulatory questions, illustrating the continued need for information exchange and clarification between authorities.

Appendix 1. Summary of information exchange following *ad hoc* requests

Country	Organisation	PIC chemical name	Requested information	Content of the reply	Provider of information
Montenegro	Ministry of Tourism, Ecology, Sustainable Development and Northern Region Development	Cinnabar ore (cinnabarite) in lead and zinc ore concentrates	Question on whether the Union export ban applies to ore concentrates containing cinnabar. In a follow-up, it was clarified that the material was lead and zinc ore containing cinnabar at an unknown concentration.	Annex V Part 2 of the PIC Regulation does not set a concentration limit for cinnabar ore and exports of cinnabar ore are prohibited except for laboratory-scale research or laboratory analysis. It also clarified that the export ban for metallic mercury applies to mercury and mixtures containing at least 95% mercury by weight, and recommended consulting the European Commission for further details on the Mercury Regulation.	ECHA
Iceland	DNA		Request for clarification on the export notification timeline, including whether notifications relate to confirmed shipments or intended exports, whether exports are commonly cancelled during processing, and whether an export from Denmark took place.	Exporters must notify an intended export at least 35 days before the planned shipment. However, a notification does not confirm that the shipment will take place, as the export may later be cancelled. In this case, ECHA could not verify whether the shipment from Denmark had occurred and advised the requesting authority to contact the importer or the Danish DNA for confirmation.	ECHA

Country	Organisation	PIC chemical name	Requested information	Content of the reply	Provider of information
Kenya	DNA	Tetraethyl lead	Request to clarify whether an explicit consent response is still required when a similar previous request was addressed with an acknowledgment of receipt.	An acknowledgement of receipt for a similar export notification had already been received and recorded, but it did not constitute consent to import. The recently submitted documents concern a new export notification and a separate request for explicit consent. A consent response is therefore still required.	ECHA
Andorra	DNA		How to identify which substances require prior export notification, explicit consent or only an acknowledgement of receipt.	The export notification and explicit consent procedures were clarified. Chemicals listed in Part 1 of Annex I require export notification, while those in Parts 2 and 3 also require explicit consent. Links to Annex I substances and the legislation were provided.	ECHA
Peru	DNA	Phenol, 4-nonyl, branched	Request to clarify why an explicit consent request was sent for a substance that is not included in the Annex III of Rotterdam Convention.	The PIC Regulation implements both the Rotterdam Convention's export-notification requirements and separate Union procedures for hazardous chemical exports. Although the substance is not listed in Annex III, it is banned for industrial public and professional use under the Union regulations and is therefore subject to export notification and explicit-consent requirements.	ECHA

Country	Organisation	PIC chemical name	Requested information	Content of the reply	Provider of information
Costa Rica	DNA		Request for advice on pesticides imported into Costa Rica under a special customs regime. The products are temporarily stored in a customs warehouse before being re-exported and are not placed on the Costa Rican market. However, Costa Rica has received export notifications and requests for explicit consent for these shipments.	Exporting companies are required to notify their exports to the importing country that is considered to be the final destination of the product. If no customs clearance is done in Costa Rica, it should not be considered the importing country, and the export notifications and explicit consents should not be addressed to Costa Rica. No advice could be given on re-export procedures, as these vary between non-EU countries. However, details of notifications incorrectly addressed to Costa Rica may be sent to ECHA, which will forward them to the relevant exporting DNA for follow-up with the exporters on their obligations under the PIC Regulation.	ECHA
Kenya	DNA	Sodium Cyanide	Question whether sodium cyanide is subject to the Rotterdam Convention and the PIC Regulation, and, if not, which rules address its risks to human health and the environment.	Sodium cyanide (CAS 143-33-9) is not listed under the Rotterdam Convention nor in the Annex I of the PIC regulation. A link to the substance info card and chemical database were shared along with information on potential hazard classification under CLP and REACH for sodium cyanide.	ECHA

Country	Organisation	PIC chemical name	Requested information	Content of the reply	Provider of information
Canada	DNA	Nicotine	Question about how explicit consents are applied in the EU, given that Canada regulates nicotine used in vaping products differently from nicotine used in pouches.	Each explicit consent response is recorded in ECHA's database and published on ECHA's website. The Member State DNAs request and record explicit consents and select the consent applicable to each export notification. If a response is unclear, the relevant Member State DNA seeks clarification from the authorities of the importing country.	ECHA
Australia	DNA	Tetraethyl lead	A request for clarification on whether the sunset date for the use of tetraethyl lead also applies to France's overseas territories, as an export to one of these territories is planned.	The French authorities should be consulted on how REACH/Union law applies to their overseas territories. Tetraethyl lead is subject to REACH authorisation and, after the 1 May 2025 sunset date, cannot be placed on the Union market or used without authorisation. Exports from the Union to New Caledonia and French Polynesia are subject to the export notification requirements of the PIC Regulation because these territories are outside the Union's customs territory.	ECHA

Country	Organisation	PIC chemical name	Requested information	Content of the reply	Provider of information
Azerbaijan	DNA	Epoxiconazole, Thiophanate-methyl	A request for clarification regarding the manufacture of pesticides in the Union where the use of their active substances is prohibited.	Substances listed in Annex I to the PIC Regulation are banned or severely restricted in the Union in one or both of the use categories: industrial chemicals and pesticides. A substance may be prohibited or not approved for a particular use or subcategory while remaining permitted for other uses. Inclusion in Annex I does not, in itself, prohibit export. Instead, it imposes obligations on exporters in the Union, including export notification and, in certain cases, obtaining explicit consent. Links to the relevant legislation explaining the criteria and process for listing substances in Annex I were provided. Substances whose export is prohibited are listed in Annex V to the PIC Regulation.	ECHA

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