Pesticide Action Network Europe

MEET (CHEMICAL) AGRICULTURE

The world of backdoors, derogations, sneaky pathways, and loopholes.

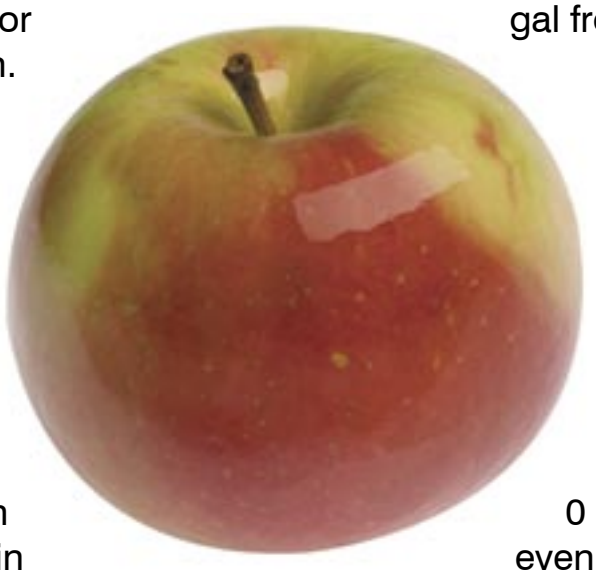
générations FUTURES

Part 1: The 120-days derogation

SUMMARY

One of the many derogations in EU pesticide legislation is the “120-day derogation” allowing EU Member States use of illegal pesticides for almost a full crop season. This on condition of “unforeseen danger” where no alternatives are available.

PAN-Europe analysed the use of this derogation in the past 4 years and observed an explosion in use, from 59 cases in 2007 to 321 in 2010, many times allowing very harmful pesticides, in total 152 different chemicals. France went up form 0 derogations in 2007 to 74 in 2010, Greece from 6 derogations to 54 and Portugal from 1 to 41 in 2010.



PAN-Europe concludes it is highly likely the provision is misused by Member States on a large scale. Can Portugal have 1 case of “unforeseen danger“ in 2007 and 31 in 2010? Can France have 0 derogations in 2007 and even 0 in 2008 and 2009 and all of a sudden 74 cases of “unforeseen danger” in 2010? This looks more

like whitewashing illegal use. Several granted authorisation fi. on soil fumigants also cannot be an “unforeseen danger” at all and alternatives are readily available.

PAN-Europe additionally observes an enormous intransparency in decision making, done behind closed doors in the Standing Committee of DG SANCO. Applications for these derogations are not published, Commission “measures” are not published and a discussion and voting –if any- is not visible, as well as any control or enforcement action. PAN-Europe thinks it is essential for stakeholders to be able to verify if a provision is properly used. Committee meetings and documents should be freely accessible.

Given the long list of derogations, backdoors and loopholes in pesticides policy in general, a ‘wider picture’ needs to be considered. PAN-Europe believes the conflict of interest of Agricultural Ministries, delivering the representatives in the Standing Committee, is one of the main reasons for the continuing pressure to open backdoors, serving mainly groups of back lagging farmers, stopping innovation in agriculture and certainly not serving citizens in Europe.

1. INTRODUCTION, the 120-day derogation rule of Directive 91/414.

(Old) Directive 91/414 provides for a derogation on the use of a non-authorised pesticide for 120-days in case of "unforeseeable danger which cannot be contained by other means" (Art. 8.4, procedure Art.19[1]). The use shall be "limited and controlled". Member States doing so, must immediately inform other Member States and Commission and a decision will be taken in the Standing Committee. So far for the rules on 120-days derogations.

What happened in the last 4 years of granting authorisations in EU Member States on the basis of this derogation?

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1. Council Directive of 15 July 1991 concerning the placing of plant protection products on the market

Article 8.4.

By way of further derogation from Article 4, in special circumstances a Member State may authorize for a period not exceeding 120 days the placing on the market of plant protection products not complying with Article 4 for a limited and controlled use if such a measure appears necessary because of an unforeseeable danger which cannot be contained by other means. In this case, the Member State concerned shall immediately inform the other Member States and the Commission of its action. It shall be decided without delay, in accordance with the procedure laid down in Article 19, whether and under which conditions the action taken by the Member State may be extended for a given period, repeated, or revoked.

Article 19

Where the procedure laid down in this Article is to be followed, matters shall be referred without delay by the chairman, either on his own initiative or at the request of a Member State, to the Standing Committee on Plant Health, set up by Decision 76/894/EEC (7), herinafter referred to as 'the Committee'.

The representative of the Commission shall submit to the committee a draft of the measures to be taken. The committee shall deliver its opinion on the draft within a time limit which the chairman may lay down according to the urgency of the matter. The opinion shall be delivered by the majority laid down in Article 148 (2) of the Treaty. The votes of the representatives of the Member States within the committee shall be weighted in the manner set out in that Article. The chairman shall not vote.

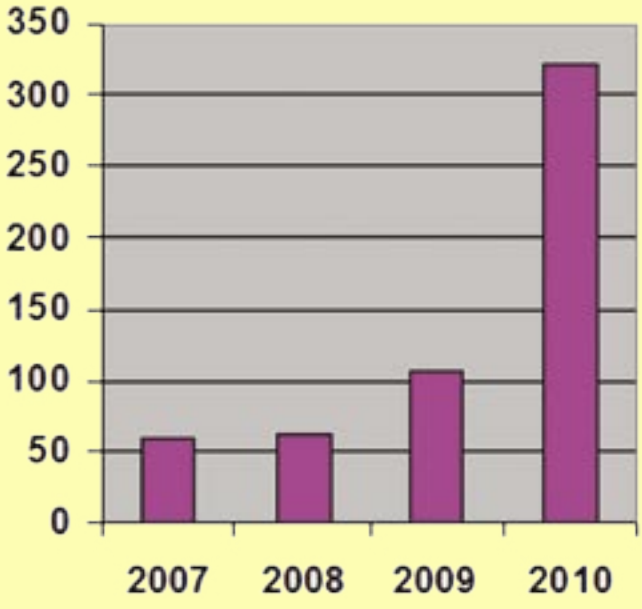
The Commission shall adopt the measures envisaged if they are in accordance with the opinion of the committee.

If the measures envisaged are not in accordance with the opinion of the committee, or if no opinion is delivered, the Commission shall, without delay, submit to the Council a proposal relating to the measures to be taken. The Council shall act by a qualified majority.

If, on the expiry of a period of three months from the date of referral to the Council, the Council has not acted, the proposed measures shall be adopted by the Commission.

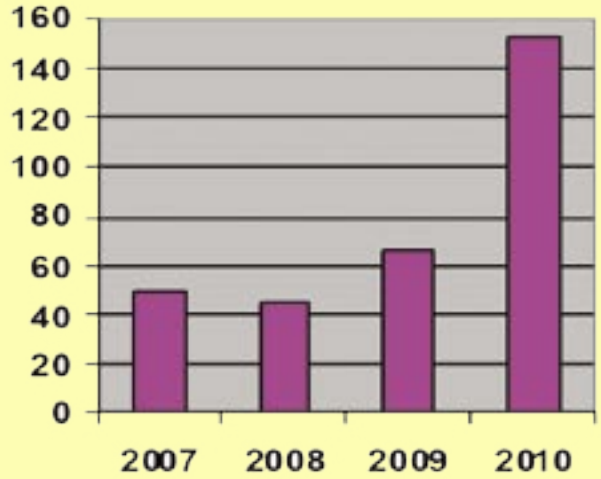
2. Analysis of 120-day derogations from 2007 till 2010

Derogations granted by EU Member States (MS) based on the 120-day derogation rule exploded in recent years. In 2007 59 of such derogations were granted, while in 2010 already 321 derogations were granted, a rise to over 500% .



Number of derogations granted by EU Member states

Also the number of MS granting such derogations has risen from 15, almost half of the MS in 2007 to 24 in 2010. Luxemburg, Estonia and Malta are the only ones not granting these kind of derogations (for more details, please check attached EXCEL with all individual derogations in the last 4 years). The number of active substances also has risen dramatically, amounting to 152 in 2010. Given the approved number of active substances in Europe is around 300 substances, this quite a high figure.



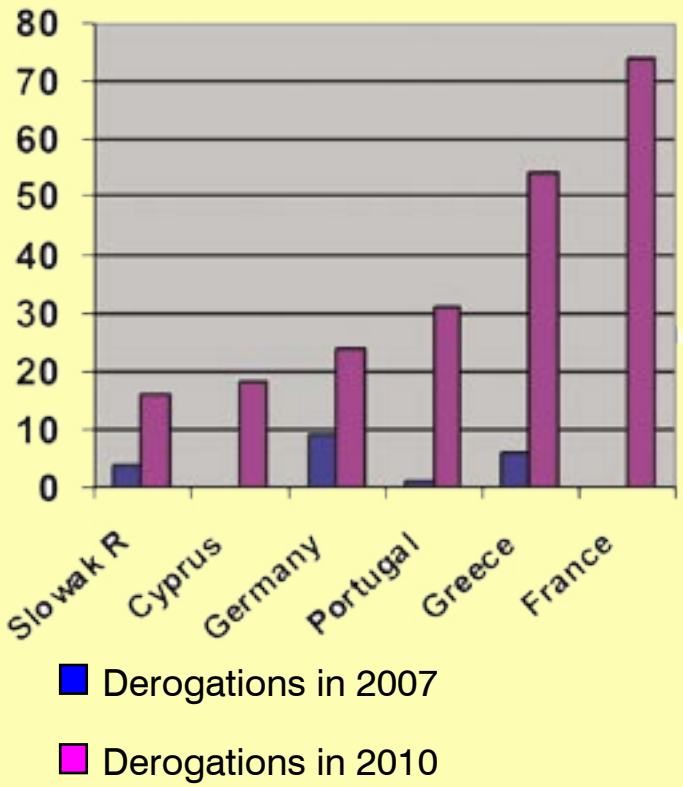
Number of active substances used in these derogations

Considering the top-5 of MS granting derogations (Table below) it looks like Austria and Germany were the ones leading the way for other MS on this “innovation” for getting market access of non-authorised pesticides. Especially Greece, Portugal and Cyprus, and in 2010 France apparently now started using this ‘unforeseeable danger’ as a main route for getting pesticides authorised.

Top-5 MS derogations 2007	Top-5 MS derogations 2008	Top-5 MS derogations 2009	Top-5 MS derogations 2010
AT (13)	AT (12)	AT (16)	FR (74)
DE (9)	PT (10)	PT (14)	EL (54)
EL (6)	SK (9)	BG (11)	PT (31)
IE (5)	DE (9)	DE (10)	DE (24)
SK/ES(4)	CZ (6)	EL (9)	CY (18)

France is clearly EU backdoor champion going from 0 derogations in 2007 to 74 in 2010, Greece going from 6 to 54 is also competing hard for being backdoor champion, while Portugal from1 to 31 in 2010 and Cyprus from 0 to 18 derogations are also part of the race.

Austria, once the number one on derogations remains with the 12-16 derogations over the years, most of the time the same pesticides. Germany, however, also started increasing the derogations for unknown reasons.



The derogations granted were in some cases for pesticides with a mild toxicity like substances for the organic sector or substances for biological control

from 59 derogations in 2007 to 321 in 2010

(B.Thuringiensis, B.bassiana, Calcium polysulfide), but in the vast majority of cases synthetic pesticides were granted market access and in many cases chemicals with a dangerous health and environmental profile. Nasty soil fumigants 1,3-Dichloropropene and Metam-sodium were amongst them as well as old and dangerous organochlorine pesticides like Endosulfan, Dichlorvos and Chlorpyriphos, and harmful pesticides like Imidacloprid, Thiamethoxam and Glyphosate.

About volumes nothing is made public but in case of soil fumigants it will be 200-400 litres used per hectare and if the chemical is used widely, easily tenth or hundreds of tonnes per year could be applied.

In 2010 even 19 derogations were granted for the illegal fumigant 1,3-Dichloropropene in most southern EU countries and Belgium. Neurotoxins Chlorpyriphos and its –methyl variant were allowed 13 derogations in 2010, mainly in Germany and Greece.

Also the Neonicotinoids (Imidacloprid, Thiomethoxam, Acetamiprid, Clothinidin, Thiacloprid), the group suspected to be responsible for Bee Colony Collapse, were quite popular and were granted 27 derogations in 2010 in different countries. Romania and Italy once granted a derogation for the outdated and illegal organochlorine pesticide Endosulfan; Spain and Portugal for another illegal organochlorine pesticide, Dichlorvos.

3. The “unforeseeable danger which cannot be contained by other means”

Article 8.4 of Directive 91/414 requires the authorisation to restrict to those cases of “unforeseeable danger which cannot be contained by other means”. It is highly unlikely the derogations are based on this condition. Austria fi. mainly granted derogations for the same pesticides (Azadirachtin, 1-Napthylacetic Acid, Calcium polysulfide, Streptomycin, Dimethenamid-P) which looks very much like a regular authorisation and nothing to do with “unforeseeable danger”. Also note the “120-days” provision allows for many crops a full growing season of application.

The fact that many EU Member States had no “unforeseeable danger” situation at all in 2007 (fi. Cyprus, France, Italy, Bulgaria, Romania) and now have a long list of `unforeseeable danger which cannot be contained by other means`, also doesn’t support their cases. France going from none in 2007, 2008 and 2009 and 74 in 2010 feels like a sudden misuse of the derogation.

Granting soil fumigants an authorisation for “unforeseeable danger” for sure is a question of misuse while soil fumigants are connected to narrow crop rotations, mainly monocultures. It can be foreseen monocultures will lead to disturbed soil life and pests for the monoculture crop. The chemical is only used to be able to continue these bad practices. The alternative is of course use of a wider crop rotation.

Granting use of neonicotinoides is probably done because of their ease of use (seed coating fi.) and their persistence. The need for a derogation for “unforeseeable danger which cannot be contained by other means” is hard to understand given the large battery of insecticides available in the market, as well as techniques for biological control.
Final example is the derogation for Glyphosate. Alternatives (herbicides and mechanical weeding) are widely available and it is hard to understand why such a derogation should be granted.

4. “Limited and controlled use” & decision-making in Standing Committee

The decision taking process looks quite sloppy. An individual proposal, discussion and decision is apparently lacking. Every time in the records of the meeting in the Standing Committee it is mentioned "Committee took note" of the notifications of Member states. All notifications made by Member States are reported in the "summary records" of the meetings of the Standing Committee http://ec.europa.eu/food/committees/regulatory/scfcah/phytopharmaceuticals/index_en.htm and Commission keeps adding warnings to these notifications (see fi. Commission text of summary record of 28/29 September 2010[2]).

The continued mentioning of these warnings throughout the years don't sound like Member States are very willing to follow the rules. The implication could be not all Member States,

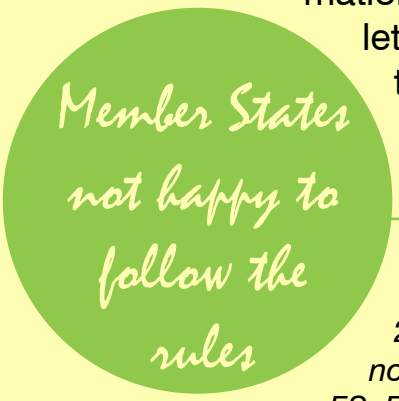
· inform Commission on (all) derogations they have granted

· set food national standards (MRL's), or even don't set a MRL at all, do a consumer risk assessment, and don't inform Commission and Food Authority EFSA

· put in place mitigation measures to protect humans and the environment.

France suddenly produced a long list of derogations in the October-meeting of 2010 after growing season and most likely these pesticides are applied already. Article 8.4 of the Directive however states Member States should inform other member States and the commission immediately and the procedure of Article 19 followed. In the case of France it is unclear how this procedure can be followed in such a late stage.

The decision-taking process in the Standing Committee is very in transparent and done behind closed doors. Representatives (mainly civil servants from national ministries of agriculture) decide on the basis of a complicated voting system. Throughout the 4 years evaluated here apparently, following the summary records, there was never any discussion on the many notifications. Article 19 of the Directive however states: "The representative of the Commission shall submit to the committee a draft of the measures to be taken. The committee shall deliver its opinion on the draft within a time limit which the chairman may lay down according to the urgency of the matter". Summary records don't mention "drafts of measures to be taken" and submitted by Commission. Severe doubts can be raised if such a draft is made and if Commission has any background information on the individual derogations, let alone controls the use of pesticides based on these derogations.



2. The Committee took note of the notifications submitted by CY, DE, DK, ES, FR, EL, IT, PL, PT, RO, SK and SE.
The Commission recalls that under the provisions of article 8(4) Member States are obliged to inform the Commission and the other Member States immediately after they have granted such a derogation.
In addition, the Commission pointed out that if an MRL (maximum residue level) set under Reg. (EC) No 396/2005 cannot be met and a national MRL is set, nevertheless, a consumer risk assessment has to be carried out and forwarded to the Commission, the European Food Safety Authority and Member States.
Member States are reminded that they shall put in place the necessary risk mitigation measures to ensure acceptable uses for human and animal health and the environment.

5. Conclusion

The procedure on the “120-day derogation” is very intransparent. No notifications of Member States are published mentioning the arguments why in the specific case the pest in question is a danger, why it is unforeseeable, why it cannot be contained by other means, and how the limited use is ensured, and how the use is controlled including the setting of food standards in some cases. It cannot be checked if proper notifications and justifications are made.

The ‘draft of the measures to be taken” (Art.19) which Commission needs to submit to the Committee for every application of a derogation is not published and even it is not sure if it exists at all. Finally the opinion of the Committee is not published (further than “took note”) nor any voting in the last 4 years can be seen. About control of the authorisation nor enforcement, nothing is known.

From the analysis in this report, it is highly likely the “120-day derogation” for authorisation of pesticides in EU member States is misused on a large scale to allow use of illegal pesticides. The “unforeseeable danger” clause is disregarded fi.

as it is about soil fumigants 1,3-Dichloropropene and Metam-sodium, the “cannot be contained by other means” clause is most likely forgotten as derogations are granted for insecticides and herbicides while other chemicals but also non-chemical methods and practices are widely available, there is no sign of “limited and controlled” use in derogations, only Commission “reminding” Member States of this clause, and there is no sign of national food risk assessment done or MRL’s set. Any discussion or voting in the Committee is missing.

120 derogation misused on a large scale

An explosion of the use of the derogation also doesn’t contribute to the image of a sound use of the Directive, France making a joke of the provision, having 74 “unforeseeable danger” situations in 2010.

[11]

6. RECOMMENDATIONS

Transparency should be improved. Standing Committee should have open meetings and make meeting documents available. There is no reason why these documents and opinions should be kept secret. The intransparency also gives the EU a wrong image of dealing behind closed doors and keeping stakeholders at a distance.
On this derogation every EU Member State who likes to use this provision should publish an application with full justification and grant stakeholders a period for comment. Commission should submit a balanced proposal to the Standing Committee and organise an open discussion in the meeting. In this way we should get to a proper use of this provision of the EU regulation.
Member States looking for misusing rules and provisions should be controlled and enforced by Commission. The impression is "reminders" of Commission are not enough. We therefore propose to do an assessment of all derogations in 2010 and check on all aspects of Art. 8.4 in connection with Art.19.

A whole range of 'innovations' have been devised through the years to allow the use of illegal or banned pesticides. Loopholes like "essential use" (use of banned pesticides), "provisional use" (use of new pesticides while the decision to approve is not made yet), "mutual recognition" (forcing EU member states to allow a pesticide when it is authorised in another), "prolongation" (allow market access without evaluation), "minor use" (a yet to be defined new possibility to use non-approved pesticides), "resubmission" (allow a banned pesticide to stay on the market while being assessed in a fast track priority procedure), together with the

"120-day derogation" have developed to main routes of allowing use of pesticides. It looks very much like a culture of finding ways beyond the royal route of the Directive (soon Regulation).

Therefore, may-be even more important, it is necessary to look at the 'greater picture'.

Directive 91/414 starts by stating "risk for human health and the environment should take priority over the objective of improving plant production"([3]). This fundamental principle of pesticide regulation is in daily practice apparently forgotten many times and probably not accepted by heart by many regulators. The pesticide unit in Europe luckily moved from DG Agriculture to DG SANCO but in almost all EU Member states pesticide policy is firmly in the hands of Agricultural Ministries. This could explain why in many cases the interests of farmers are more on the radar of national representatives than human health and the environment. In fact the opposite of what the Directive intended.

A clear example was the recent (Council, November 2010) fight of southern EU Member States for getting approval for the completely unacceptable pesticide 1,3-Dichloropropene (incomplete dossier, carcinogen). Human health and the environment simply didn't matter in this political game in the end. A conflict of interest keeps on being present as long as policy is made in Agricultural Ministries and we can expect many 'innovations' will be made to allow non-authorised pesticides on the market. Policy coordination should move to Health and Environment Ministries to ensure the high level of protection of human and the environment.

The interests of farmers served by Agricultural Ministries in this derogation will be mainly those relying heavily on pesticides, using fixed spraying calendars as their way of crop management. This is quite strange as Europe just adopted a sustainable use Directive (128/2009/EC) making Integrated Pest management (IPM) the mandatory management practices for farmers from 2014 on[4].
So national agricultural policy seems to be focussed very much on those farmers using outdated practices. Supplying back-laggards with more pesticides will not only be seen as support for their management style but also stops innovation to non-chemical methods and practices. Many companies offering biological control techniques or companies assisting farmers to change to integrated pest management will get a problem getting their practices introduced in the market as long as pesticides are abundantly present. This derogation- and loophole policy in fact doesn't help agriculture in the end as innovation to sustainable practices are delayed.

conflict of interest with Ministries of Agriculture

3. Whereas the provisions governing authorization must ensure a high standard of protection, which, in particular, must prevent the authorization of plant protection products whose risks to health, groundwater and the environment and human and animal health should take priority over the objective of improving plant production;

4. General principles of integrated pest management

1. The prevention and/or suppression of harmful organisms should be achieved or supported among other options especially by:
— crop rotation,
— use of adequate cultivation techniques (e.g. stale seedbed technique, sowing dates and densities, under-sowing, conservation tillage, pruning and direct sowing),
— use, where appropriate, of resistant/tolerant cultivars and standard/certified seed and planting material,
— use of balanced fertilisation, liming and irrigation/drainage practices,
— preventing the spreading of harmful organisms by hygiene measures (e.g. by regular cleansing of machinery and equipment),
— protection and enhancement of important beneficial organisms, e.g. by adequate plant protection measures or the utilisation of ecological infrastructures inside and outside production sites.

2. Harmful organisms must be monitored by adequate methods and tools, where available. Such adequate tools should include observations in the field as well as scientifically sound warning, forecasting and early diagnosis systems, where feasible, as well as the use

Pesticide Action Network Europe is a network of NGOs working to minimise negative effects and replace the use of hazardous chemicals with ecologically sound alternatives. Our network brings together consumer, public health, and environmental organisations, trades unions, women's groups and farmer associations from across 19 European countries. We work to eliminate dependency on chemical pesticides and to support safe sustainable pest control methods.

of advice from professionally qualified advisors.

3. Based on the results of the monitoring the professional user has to decide whether and when to apply plant protection measures. Robust and scientifically sound threshold values are essential components for decision making. For harmful organisms threshold levels defined for the region, specific areas, crops and particular climatic conditions must be taken into account before treatments, where feasible.

4. Sustainable biological, physical and other non-chemical methods must be preferred to chemical methods if they provide satisfactory pest control.

5. The pesticides applied shall be as specific as possible for the target and shall have the least side effects on human health, non-target organisms and the environment.

6. The professional user should keep the use of pesticides and other forms of intervention to levels that are necessary, e.g. by reduced doses, reduced application frequency or partial applications, considering that the level of risk in vegetation is acceptable and they do not increase the risk for development of resistance in populations of harmful organisms.

7. Where the risk of resistance against a plant protection measure is known and where the level of harmful organisms requires repeated application of pesticides to the crops, available anti-resistance strategies should be applied to maintain the effectiveness of the products. This may include the use of multiple pesticides with different modes of action.

8. Based on the records on the use of pesticides and on the monitoring of harmful organisms the professional user should check the success of the applied plant protection measures.

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Substance vs. Member State	DE	NL	SK	AT	LT	HU	PL	UK	CZ	BE	ES	IE
Linuron	2										2	1
Maleic Hydrazide	1											1
Coniothyrium minitans												
1,3-Dichloropropene										2	3	
Pyrethrins												
Endosulfan												
Fipronil	1	1		1								
Iprodion		1										
Imidacloprid									1		1	
Pencycuron									1			
Beauveria brongiartti	1			1								
Chlorpyriphos	2											
Chlorpyriphos-methyl	2											
Abamectin			1									
B.Thyringiensis					1							
Cypermethrin											1	
Flubendiamide												
Indoxacarb	1											
Spinosad				1							1	
Metaflumizone												
Thiamethoxam												
Pyraclostrobin			1								1	
Pyriproxyfen												
Metribuzin												
Thiophanate-methyl												
Magnesium phosphide												
Laminarin			1									
Beauveria bassiana			1	1								
Calcium polysulfide				1								
Imazamox				1								
Quassia extract				1								
Streptomycin				1								
Benzoic Acid												
N-Decanol										1		
Fosthiazate												
Tebuconazole												
Clothianidin	1											
Asulam												
Diuron												
NPV												
Aureobasidium pullulans			1			3						

SE	EL	PT	RO	IT	LV	SI	BG	DK	FI	CY	FR	**total**
					1							**6**
	1											**3**
		1										**1**
	2	3		2						1	6	**19**
		2										**2**
			1									**1**
												3
												1
	1	2		1						1		**7**
												1
												2
	4									1	1	**8**
				1							2	**5**
	4		1	1						2		**9**
	5									1		**7**
	2						1			1		**5**
	2									1		**3**
	2	1								1	1	**5**
	2		1							1	3	**9**
	2	1								1		**4**
	2						1			1	2	**6**
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		1										**1**
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	1			1			1					**4**
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								1				**1**
									1			**1**
												4

Substance vs. Member State	DE	NL	SK	AT	LT	HU	PL	UK	CZ	BE	ES	IE
GA4						1						
GA7						1						
Kasugamicin						1						
Methomyl						1						
Chlorophacinone						1						
Tricyclazole												
Propanil												
Ioxynil												
Acetamiprid	1						1					
Tefluthrin							1					
Dichloorvos											1	
Ammonium Acetate												
Triethylamine HCL putrescine												
Emamectine benzoate											1	
Flonicamid												
Forchlorfenuron												
Hydrolised proteins												
E-11-tetradecen-1 yl acetate								1				
Z-11-tetradecen- 1 yl acetate								1				
E,E-9, 11-tetradecadienyl acetate								1				
6-Benzyladenine	1							1				
Azadirachtin				1								
Dimethenamid				1								
Dimethomorph				1								
Ethephon				1							1	
Isonet				1								
Pyrethrine, rape oil				1								
Bentazon										1		
B-Cyfluthrin												
Metconazole												
Metalaxyl-M												
Fludioxynil			1									
Cydia pomonella granulovirus	1		1									
Giberellins	1											
Spirotetramat	2											
Streptomycin	1											
Z, 8 Dodecen 1yl acetate	1											
E,8 Dodecen 1 yl acetate	1											
Z,8 Dodecen 1 ol	1											
E,5 decenyl acetate												

SE	EL	PT	RO	IT	LV	SI	BG	DK	FI	CY	FR	**total**
												1
												1
												1
	1											**2**
												1
	1			1								**2**
				1								**1**
					1							**1**
											1	**3**
											1	**2**
		2										**3**
		2									1	**3**
		2										**2**
	1	2								1		**5**
		1										**1**
		1										**1**
		2										**2**
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	2											**3**
	1											**2**
	1											**3**
	2											**2**

Substance vs. Member State	DE	NL	SK	AT	LT	HU	PL	UK	CZ	BE	ES	IE
E,5 decenol												
Chloropicrin											1	
Cyfluthrin												
Chlorantraniprole												
Aclonifen						1						
Penoxsulam						1						
Chlorothalonil												1
Diflubenzuron							1					
Glyphosate							1					
Metam-sodium		1										
Deltamethrin	1		1									
Fenoxycarb			1									
Fosetyl-Al			1									
Methoxyfenozide			1									
Prohexadione			1									
Boscalid			1									
Thiacloprid			1									
Dimethoate												
Azoxystrobin	1											
Oxamyl	1											
Captan												
Carfentrazone-ethyl												
Flurprimidol												
Spodoptera nucl. Virus											1	
Clofentezin												
Etoxazole												
Fenbutatinoxide												
Tebufenpyrad												
Cyprodinil			1									
Fenamifos												
Cyhalothrin												
1-Methylcyclopropene												
Clomazone												
Metribuzin												
Ethoxyquin												
Cyromazine			1									
Chlorprofam												
Tribenuron methyl												
Ipconazole												
8-Hydroxychinolin	1											

SE	EL	PT	RO	IT	LV	SI	BG	DK	FI	CY	FR	**total**
	2											**2**
												1
	1											**1**
	1									2	1	**4**
												1
												1
												1
												1
2												**3**
		1										**2**
				1				1			2	**4**
												2
												1
												1
												1
												1
										1	5	**7**
										1		**1**
	1											**2**
											1	**2**
								1				**1**
								1				**1**
								1				**1**
												1
	1											**1**
	1											**1**
	1											**1**
	1										1	**2**
				1							1	**3**
	1			1								**2**
		1		1								**2**
		1										**1**
		1									3	**4**
		1									1	**2**
		1										**1**
												1
	1											**1**
	1											**1**
							1					**1**
												1

Substance vs. Member State	DE	NL	SK	AT	LT	HU	PL	UK	CZ	BE	ES	IE
Bifenthrin												
Formalfehyde		2										
Benfuracarb												
Methabenzthiazuron												
Oxyfluorfen-propyzamid												
Dicamba												
Phenmediphame												
Pendimethalin												
Napropamide												
Flufenacet												
Isoxaben												
Metamitrone												
Ethofumesate												
Desmediphame												
Mancozeb												
Mefenoxam												
Copper hydroxide												
Clopyralid												
Mesotrion												
Fluazifop p butyl												
Sulcotrion												
Rimsulfuron												
Pyridate												
13-octadecenal												
11-hexadecenal												
9-hexadecenal												
Carfentrazone-ethyl												
Diaminopentane												
Trimethylamine hydrochloride												
Dimethachlor												
TOTAL	**25**	**5**	**16**	**14**	**1**	**10**	**4**	**4**	**2**	**4**	**14**	**3**

SE	EL	PT	RO	IT	LV	SI	BG	DK	FI	CY	FR	**total**
					1							**1**
												2
											2	**2**
											1	**1**
											2	**2**
											3	**3**
											3	**3**
											1	**1**
											3	**3**
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											2	**2**
											1	**1**
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											1	**1**
											1	**1**
											1	**1**
											1	**1**
											1	**1**
											1	**1**
												321
3	**54**	**32**	**3**	**13**	**3**	**1**	**11**	**6**	**1**	**18**	**74**	