

# RIGOROUS SCIENCE, SAFE FOOD, AND A HEALTHY ENVIRONMENT

## A MANIFESTO

The European Union has one of the best regulations for pesticides in the world – in theory. But it is not implemented in practice. A new coalition, “**Citizens for Science in Pesticide Regulation**”, has launched this manifesto to call for reform.

This action comes at a crucial time, when the European Commission is reviewing the pesticides legislation as part of its REFIT programme. In addition, the European Parliament’s PEST committee, convened by concerned MEPs in the wake of the glyphosate reapproval controversy, will deliver its recommendations for reform of the pesticides authorisation process at the end of 2018.

## THE PROBLEM

The EU pesticides regulation explicitly prioritises the protection of human and animal health and the environment. It is underpinned by the precautionary principle to ensure that pesticide substances or products placed on the market do not adversely affect human or animal health or the environment. However, the rules are not implemented properly and the regulatory system allows private interests to take priority over health and the environment.

Major conflicts of interest persist in the pesticides regulatory system. For example, industry does its own safety testing and is heavily involved in designing the methods for risk assessment. The European Food Safety Authority (EFSA) pesticides panel, responsible for the designing of risk assessment guidelines, continues to include people with financial ties to the agrochemical industry. The EFSA expert groups, which conduct the peer review of the application dossier and publish an opinion on whether it meets the criteria for approval of the pesticide, consist of anonymous national civil servants, whose conflict of interest is unknown. The Monsanto Papers, internal Monsanto documents disclosed in cancer litigation in the USA, show how industry can actively subvert science. It is now clear that industry must be kept at arm’s length from safety testing, risk assessment and risk management.

The result of the failure to properly implement the regulation is a rapid collapse of biodiversity (birds, bees, butterflies, frogs, and insects) in agricultural areas and serious harm to humans (including damage to the brain of the unborn foetus and a steady rise in hormone-related cancers such as breast and prostate). In addition to its failure to protect health and the environment, the current system also fails to protect food security for future generations, since biodiversity, pollinators, and soil fertility – the building blocks of a productive and resilient agriculture – are put at risk by pesticides.

## THE SOLUTIONS

**A full reform of the current pesticide risk assessment and risk management systems is required, as follows:**

### A. PRIORITISE PUBLIC HEALTH, THE ENVIRONMENT AND SUSTAINABLE AGRICULTURE

1. The European Commission shall propose the approval of a pesticide substance only when all the scientific evidence shows that the substance or the final product causes no adverse effect on humans, animals, and the environment, all uses proposed by industry are considered safe by EFSA, and no safer alternative (substance or practice) is available.
2. The Sustainable Use of Pesticides Directive must be respected: pesticides must be used only as a last resort when all other non-chemical alternatives have been applied and failed.
3. The European Commission, as risk manager, shall operate transparently and with accountability. It must fulfil its obligation under the pesticide regulation to prioritise public health and the environment over all other considerations, such as private profit. The decision-making process – the discussions between the European Commission and the Member States, or any other entity – shall be public.
4. To enable EU farmers to improve their practices without being 'punished' by markets, the European Commission shall not place them in a position of unfair competition and shall therefore ban imported products that contain residues of non-approved pesticides, or that contain residues of any pesticide exceeding permitted levels, with no exceptions.

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B. ENSURE THAT DECISION-MAKERS RELY ON DATA THAT IS COMPLETE, PUBLIC, UP TO DATE, AND FREE FROM INDUSTRY BIAS

5. Safety testing of pesticides shall be carried out by independent laboratories and not by the pesticide industry itself. The process shall be paid for by an industry-supplied fund that shall be managed by an independent public body such as EFSA.
6. To prevent cherry-picking of favourable data, all safety studies must be registered in advance. No safety study that is not registered shall be used in support of regulatory authorisation of a pesticide.
7. All experts involved in risk assessment shall be subject to a strict conflict of interest policy and rules. Any ties to commercial interests will exclude them from the process.
8. Existing guidelines on risk assessment shall be fully reviewed by independent scientists because in many cases they were designed and promoted by industry and are biased in favour of industry interests.
9. EU-funded research programmes shall prohibit industry-linked individuals from joining projects that design or evaluate risk assessment methodologies.
10. The data requirements to assess whether a pesticide should be authorised need to be updated urgently, because major health effects, such as immunotoxicity, endocrine disruption and developmental neurotoxicity, are not adequately covered and the impacts on environmental ecosystems are severely underestimated.
11. Industry dossiers shall only be accepted into the authorisation process when all required data is delivered, including all independent peer-reviewed publications related to health and environmental effects of the pesticide. Pesticides that do not fulfil all the requirements of the regulation must be banned.
12. Formulations of pesticides as sold and used (and not just the isolated active ingredient) shall be tested and assessed for crucial endpoints (e.g. mutagenicity, carcinogenicity, developmental toxicity, and endocrine disruption) relevant to humans, mammals and all non-target species, such as bees, birds, frogs, and earthworms.
13. The cocktails of pesticide residues to which EU citizens are exposed every day must be considered when calculating "safe" daily exposure levels. Until this is implemented, an additional "safety" factor of 10 shall be applied in all pesticide risk assessments. This additional

safety factor shall also be applied in the calculation of the acceptable environmental concentrations of pesticides.

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C. ENABLE DECISION-MAKERS, CIVIL SOCIETY, AND THE SCIENTIFIC COMMUNITY TO SCRUTINISE THE INTEGRITY AND EFFECTIVENESS OF THE POLICY

14. All the results and data of all pesticide safety tests shall be published on the internet in a consistent and searchable format.

15. National authorities shall conduct routine independent post-approval monitoring of the effects of pesticides on health and the environment. The monitoring shall be paid for out of a fund supplied by the pesticides industry but managed by an independent body. There must be no contact on these matters between the monitoring authorities and industry.

## CONCLUSION

If the EU regulation were properly implemented and risk assessment methods were overhauled to be scientifically rigorous and objective, a number of pesticides that were previously deemed safe would be shown to endanger human health and/or the environment and would have to be banned or restricted.

The above-listed reforms would lead to a higher level of protection for health and environment. Given the numerous non-chemical alternatives for plant protection based on ecological methods, the reforms would also stimulate innovation in agriculture in a more sustainable direction. As a result, food security could be guaranteed not only for the present but also for the future, by protecting the basic requirements for agriculture: biodiversity, soil fertility and water quality. Produced by the **"Citizens for Science in Pesticide Regulation"**, a coalition of civil society organisations, institutions, scientific and legal experts.

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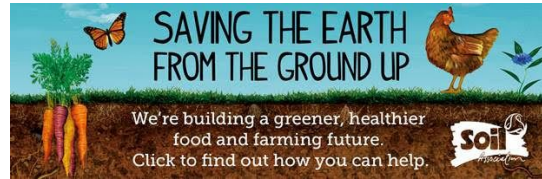
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Alliance for Cancer Prevention  
Asociación de Fibromialgia de Gran Canaria  
Asociación Española de Apicultores (A.E.A.)  
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