Pesticide Action Network Europe

ARE CURRENT RISK ASSESSMENT METHODOLOGIES BASED ON SCIENCE?

- RA methodologies are developed by specific industry lobby groups like ILSI (International Life Sciences Institute) for decades and they have specialized offices around the world
- Example Carcinogens: EU decided in 2000 that people should not be exposed to carcinogens; ILSI then developed a tool to find a “safe threshold” for carcinogens; ILSI and other industry groups infiltrated EFSA panels and organized meetings with EFSA. In the end an EFSA panel with a lot of ILSI-people decided on safe thresholds; undermining EU policy.
- Similar cases can be seen on,
  - TTC (Threshold of Toxicological Concern), a tool to qualify unknown chemicals as safe
  - “Human relevance”, a tool to disqualify observed adverse effects in animal studies
  - “Historical Control Data”, a tool to disqualify observed high levels of cancer
  - Micro/mesocosm; leads to a watering-down of standards by a factor 30
  - “Recovery” of non-target organisms; allows pesticides to kill all non-target organisms if they are thought to “ return” one year later.
  - “Relevant metabolites”, an invention to qualify metabolites 'non-relevant', meaning they don't have to respect drinking water standards
  - and currently AOP (Adverse Outcome Pathway); a new development, given a boost by the cosmetics regulation since no animal testing is allowed here and -at the same time- but promoted by industry to disqualify adverse effects in test animals
- On Glyphosate dossier HCD was misused, statistics was misused as well as other assumptions and speculations (“ non-treatment related”)
- Industry agenda: substitute animal testing by assumptions and “expert judgement”.