A poisonous injection - a study on the process to cumulative risk assessment of pesticides

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To: World Health Organization
Executive Board
For the attention of the Chair, Jane Halton PSM
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Concerning : PAN Europe study on cumulative risk assessment.

Dear Ms. Halton and members of the WHO Executive Board, we herewith send you the results of our new study regarding the process to the implementation of the cumulative risk assessment of pesticides. Every day people are exposed to dozens of pesticide residues in food, in fruit and vegetables, and to hundreds of other chemicals during their lifetime. Food standards however are based on a single exposure, which is unrealistic. Consequently these standards do not protect humans against the potential health damage of mixtures especially over an extended period of time. In the US cumulative risk assessment was included in regulation in 1996; in Europe in 2005 in the Residue Regulation 396/2005. We have expressed our concerns about the slow implementation on the methods to assess cumulative effects on several occasions but in Europe even nine years after the publication of the Regulation people in Europe are not protected against the harms of cumulative effects, in the US even longer.

Our report, in summary, reveals that one of the main reasons for the delay is industry lobby and infiltration by network of industry people in scientific panels at European and international level in WHO and OECD. And, importantly, a lack of attention of WHO, Commission and agencies to this kind of unfair practices. Our research shows a well planned and orchestrated attempt of industry to undermine policies meant to evaluate the toxicity of chemicals mixtures (cumulative risk assessment, CRA). This is done by putting industry-linked experts in crucial positions in expert panels of the World Health Organisation (WHO) and of the European Food Safety Authority EFSA.

The WHO was an easy target for industry because industry-linked scientists -who kept their bias hidden- could simply outnumber the other attendants in the WHO-panel and impose the industry position on the WHO. Our research shows that out of the WHO-planning group on CRA, 73% of the members were not impartial observers, but rather had industry-links and conflicts of interest, while 5 out of the 6 authors that published the final WHO-framework had strong industry-ties. A handful of industry-linked people

therefore managed to dominate the WHO. Remarkably, none of them was an active scientist nor were any involved in developing research.

With regard to the European Food Safety Authority EFSA, industry has taken a similar approach: infiltration by industry-linked experts in EFSA panels and working groups. Of the experts having worked on CRA for EFSA, PAN Europe observed that 19% had a formal relation with industry lobby group ILSI (International Life Sciences Institute) and that even the majority (52%) had a connection with industry. The same people dominating WHO managed to dominated EFSA on CRA, where they have been found 'fertile ground'. Many national experts and civil servants present in EFSA panels have been in their positions their entire career and were reluctant to change their mindset. Many felt that cumulative mixture toxicity is a non-issue. Therefore, EFSA's work on CRA in the first 6 years has tended to lean towards a position that would qualify mixture toxicity as largely irrelevant and that no extra consumer protection is necessary.

Thanks to an intervention by the Heath Commissioner in the EU in 2011, though a bit late, EFSA was forced to change course and take CRA seriously. Still the EFSA pesticide panel refused to cooperate and in 2012 EFSA terminated the mandate of the panel because of the "lack of significant progress"[1]. At the same time, the European Parliament forced EFSA to adopt a conflict of interest policy, leading to a partial reduction in the membership of infiltrators. The outcomes of these measures remains to be seen, but this is the first example of EU Commission rolling back a clear example of industry infiltration. At the same time at WHO, nothing happened, apparently no-one realised the massive infiltration.
Still industry hasn't given up and continues to try to create credibility for another industry-promoted CRA-tool (probabilistic risk assessment, PRA) by joining forces in the EU funded research program Acropolis. The same industry-linked people that were active in WHO and in EFSA now gather in this program, co-managed by food industry group Freshfel. They promote and defend this tool (PRA) to allow a certain level of health damage to people in an attempt to 'neutralise' the coming policy on CRA, which they were unable to stop. The tool is to "*prove that pesticide use is safe*[2]" according to coordinator Van Klaveren. Acropolis also shows many dual roles, people simultaneously active in developing, advising and implementing tools. The current EFSA science director Juliane Kleiner is a clear example of having dual roles .

Ms. Halton, we sadly note that awareness on unfair practices is lacking at WHO systems in place to defend independence and a science-based approach. Unlike the EU Health Commissioner, no-one acted in WHO to defend fairness in science and the mission to protect people. Policy to prevent conflicts of interests should be put in place at WHO with high priority. And the WHO position on cumulative risk assessment also needs to be revised as a matter of urgency.

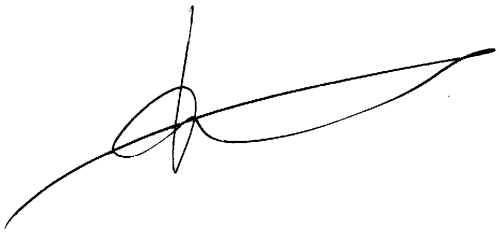
We also would like to ask you to take lessons from our research and develop stricter policy on infiltrations and unfair orchestrated lobby campaigns. We therefore would like to raise the attention in WHO on infiltration and create a 'culture of integrity' at all levels. We would like to refer to US-EPA who recently appointed a 'science integrity

[1] Minutes from an EFSA/Commission teleconference of 11 July 2012, see , http://www.pan-europe.info/Campaigns/pesticides/cum_syn_effects.html under "useful information".
[2] http://www.acropolis-eu.com/object_binary/o4422_ACROPOLIS_03.pdf

officer' who oversees the policy to increase independence, transparency and professionalism. Training staff on integrity, enhancing rigorous peer-review, and professional development at all levels should be the main roles of such a science integrity officer.
Our recommendations to you are,

- the WHO position on cumulative risk assessment therefore has to be revised as a matter of urgency
- develop a policy on conflict of interest and include the entire career of a person in the declarations of interests
- increase the attention to orchestrated infiltration attempts (from whatever side) on science and policy; a special unit in WHO should take care of this, managed preferentially by a *science integrity officer*;
- start an internal campaign (communication, training) on creating a culture of scientific integrity and professionalism in WHO.

We hope for your reaction to our recommendations,
Yours sincerely,



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