

Pesticide Action Network Europe

List of substances potentially affected by the Commission's proposed approvals criteria (Annex II, COM(2006)388)

TOTAL = 23 substances on Annex 1 or pending

	CAS No.	Active Substance	Herbicide	Insecticide	Fungicide	Other	CMR1	CMR2	ED	Current Regulatory Status
1	81-81-2	Warfarin				O	C1			Annex 1
2	10605-21-7	Carbendazim			F			M2,R2		Annex 1
3	39300-45-3	Dinocap		I	F			R2		Annex 1
4	103361-09-7	Flumioxazin	H					R2		Annex 1
5	85509-19-9	Flusilazole			F			R2		Annex 1
6	77182-82-2	Glufosinate-ammonium*	H					R2		Annex 1
7	330-55-2	Linuron	H					R2	Cat 1	Annex 1
8	32809-16-8	Procymidone			F			R2	Cat 1	Annex 1
9	94-82-6	2,4-DB	H						Cat 1	Annex 1
10	34256-82-1	Acetochlor	H						Cat 1	<i>pending</i>
11	61-82-5	Amitrole	H						Cat 1	Annex 1
12	82657-04-3	Bifenthrin		I					Cat 1	<i>pending</i>
13	52918-63-5	Deltamethrin		I					Cat 1	Annex 1
14	60168-88-9	Fenarimol			F				Cat 1	Annex 1
15	1689-83-4	loxynil	H						Cat 1	Annex 1
16	91465-08-6	Lambda-cyhalothrin		I					Cat 1	Annex 1
17	8018-01-7	Mancozeb			F				Cat 1	Annex 1
18	12427-38-2	Maneb			F				Cat 1	Annex 1
19	137-42-8	Metam-sodium		I	F				Cat 1	<i>pending</i>
20	9006-42-2	Metiram			F				Cat 1	Annex 1
21	21087-64-9	Metribuzin	H						Cat 1	Annex 1
22	1918-02-1	Picloram	H						Cat 1	<i>pending</i>
23	137-26-8	Thiram			F				Cat 1	Annex 1
Total			9	5	10	1	1	7	17	

Notes

- The 23 substances listed above represent 4.5% of the total 507 substances included in Annex 1 of Directive 91/414 (176 substances) or pending (331) as of 5 February 2008. This percentage correlates closely with the Commission's own estimates of 1.3% for CMR1,2 and 3% for ED.
- PAN Europe has identified no substances that fulfil the Commission's approvals criteria on POPs, PBT, or vPvB. This matches the Commission's own estimation that the number of substances which fulfil its environmental approvals criteria is 'very small', as well as the estimation provided by ECPA which states that substances defined under the Commission's definition of POPs, PBT and vPvB together represent less than 1% of the most important substances on the market.
- PAN Europe has listed substances as having 'endocrine disrupting properties that may be of toxicological significance in humans' where they meet the criteria of ED Category 1 [COM(1999)706]. While this provides a relatively narrow definition, it reflects the Commission's estimation that 'around 3%' of substances under review or already included in Annex I have potential endocrine disrupting properties. Together the 17 ED Category 1 substances listed above represent 3.4% of the total 507 substances currently on the EU market.
- Warfarin would gain approval under the Commission's proposed text given its mode of application.
- Procymidone is scheduled for withdrawal on 30 June 2008 (2006/132/EC).
- Glufosinate-ammonium has been listed as R2 in anticipation of the Commission's implementation of the decision by the 31st ATP of 67/548/EEC (published 14 December 2007) to categorise the substance as a Cat. 2 and Cat. 3 reprotoxin.
- The above analysis does not differentiate between metam sodium, and picloram, and their respective salts: metam sodium, dihydrate (ED Cat1), and picloram diethanolamine salts (ED Cat1).

Pesticide Action Network Europe

List of CMR3 substances included in Annex 1 or pending

TOTAL = 22 substances above and beyond those listed as CMR1,2 and ED

	CAS Number	Active Substance	Herbicide	Insecticide	Fungicide	Other	CRM2	CRM3	Endo	Current Regulatory Status
	85509-19-9	Flusilazole			1		R2	C3		Annex I
	77182-82-2	Glufosinate-ammonium	1				R2	R3		Annex I
	330-55-2	Linuron	1				R2	C3,R3	Cat 1	Annex I
	32809-16-8	Procymidone			1		R2	C3	Cat 1	Annex I
	61-82-5	Amitrole	1					R3	Cat 1	Annex I
	60168-88-9	Fenarimol			1			R3	Cat 1	Annex I
	1689-83-4	Ioxynil	1					R3	Cat 1	Annex I
	8018-01-7	Mancozeb*			1			C3	Cat 1	Annex I
	12427-38-2	Maneb*			1			C3	Cat 1	Annex I
	137-26-8	Thiram			1			M3	Cat 1	Annex I
1	1689-84-5	Bromoxynil	1					R3		Annex I
2	133-06-2	Captan			1			C3		Annex I
3	1897-45-6	Chlorothalonil			1			C3		Annex I
4	15545-48-9	Chlorotoluron	1					C3,R3		Annex I
5	94361-06-5	Cyproconazole			1			R3		pending
6	1596-84-5	Daminozide				1		C3		Annex I
7	133855-98-8	Epoxiconazole			1			C3,R3		pending
8	67564-91-4	Fenpropimorph			1			R3		pending
9	79241-46-6	Fluazifop-P-butyl	1					R3		pending
10	133-07-3	Folpet			1			C3		Annex I
11	36734-19-7	Iprodione			1			C3		Annex I
12	34123-59-6	Isoproturon	1					C3		Annex I
13	141112-29-0	Isoxaflutole	1					R3		Annex I
14	143390-89-0	Kresoxim-methyl			1			C3		Annex I
15	74-83-9	Methyl bromide		1	1			M3		pending
16	2212-67-1	Molinate	1					M3,R3		Annex I
17	88671-89-0	Myclobutanil			1			R3		pending
18	39807-15-3	Oxadiargyl	1					R3		Annex I
19	23950-58-5	Propyzamide	1					C3		Annex I
20	123312-89-0	Pymetrozine		1				C3		Annex I
21	2593-15-9	Terrazole			1			C3		pending
22	23564-05-8	Thiophanate- methyl			1			M3		Annex I

Notes

- Mancozeb and Maneb have been listed as C3 in anticipation of the Commission's implementation of the decision by the 31st ATP of 67/548/EEC (published 14 December 2007) to categorise these substances as Cat. 3 carcinogens.
- The 45 substances categorised as CMR1,2,3 or ED include 17 herbicides, 4 insecticides, 19 fungicides, 2 'other', and 3 substances used both as insecticides and fungicides.
- PAN Europe notes the difficulty expressed by the European Chemicals Bureau (ECB) in deciding whether to list a substance as C2 and C3. In the words of the ECB, 'Sometimes it is not very clear whether a substance should be classified as Carc. category 2 or 3. For example when a substance is only carcinogenic at doses exceeding the maximum tolerated dose, or when a substance is carcinogenic in one species only'.