



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

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Contact: H. Muilerman,
hans@pan-europe.info, tel.
0031655807255

To: Mr. Tonio Borg
European Commissioner for Health and Consumer Policy
European Commission
B-1049 Brussels.
(cc. Commissioner Potocnik)

Concerning: PAN Europe research outcome, and the need for further EU actions to ensure independency.

Dear Commissioner Borg,

We herewith send you our new study regarding the process to the implementation of the cumulative risk assessment of pesticide residues as provided by the 2005-Residue Regulation 396/2005.

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. We have expressed our concerns about the slow implementation by Food Authority EFSA on the methods to assess cumulative effects to you several times (last time in a letter of 11-07-13) and even 9 (nine!) years after the publication of the Regulation people in Europe are not protected against the harms of cumulative effects.

We think EFSA did a bad job failing to implement the rules and we started research to find out what the reason for this enormous delay is.

Our report, in summary, reveals that one of the main reasons for the delay is unfair industry lobby and infiltration by network of industry people in scientific panels at European and international level. And, importantly, a lack of attention of Commission and agencies to this kind of unfair practices.

Our research highlights the 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).

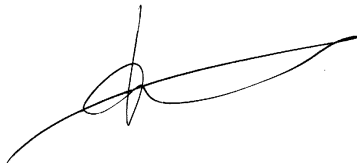
Our report show that in industry-linked experts is infiltrated in EFSA panels and working groups. Of the experts having worked on CRA for EFSA, PAN Europe observed that 19% had a formal relation with industry lobby group ILSI (International Life Sciences Institute) and that even the majority (52%) had 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.

Mr. Borg, thanks to your intervention 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 the Commission rolling back a clear example of industry infiltration.

PAN Europe notes with great pleasure the very positive role you and your Directorate-general played in reversing the unscientific, unprotecting course of EFSA. And we would like to encourage you to proceed defending science-based protocols on cumulative assessment to provide the promised protection to people, especially the new attempt by industry to include probabilistic risk assessment. Our proposals for next steps includes:

- Do not accept any delay anymore from EFSA in using cumulative risk assessment in practice, and force them to revise all ADI's (acceptable daily intakes) and MRL's (maximum residue levels) as soon as possible; including stopping probabilistic risk assessment as a tool for cumulative risk assessment;
- Increase the attention to orchestrated infiltration attempts (from whatever side) on science and policy by appointing 'science integrity officers' in both EFSA and SANCO to 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.

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



H. Muilerman,
Pesticide Action Network Europe

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".