



BRIEFING

Commission and EFSA propose to bury the topic of mixture toxicity of pesticide residues in food.

Industry infiltration in EFSA's working groups caused 13 years of delay

Chosen assessment with (industry promoted) computer modelling unrealistic

Proposed management decisions by Commission in today's ScoFCAH will lead to 'desired' outcome

Commercial interests prevail over health of EU citizens.

1. Protection of the public against harms of mixtures of pesticide residues (cocktails) in food.

Council, Commission and the EU Parliament decided in 2005 (Regulation 396/2005) to protect the public against the negative health effects of mixtures of toxic pesticides in food. Around 30% of fruit and vegetables in EU supermarkets contain more than one pesticide residue, some products like strawberries and grapes could contain up to 10 or 15 pesticides in one basket of fruit¹. EU consumers therefore are exposed to dozens of pesticide residues in their food every day. EU rules up to 2005 only protected against the exposure to only 1 pesticide. However, the implementation of the rule awaits an assessment method, to be designed by Food Authority EFSA. EFSA failed to come up with a method for 13 years now, leaving consumers in the cold and still only being protected against the harms of consuming 1 pesticide in all food. The consumption of fruit and vegetables therefore is not guaranteed to be safe.

2. EFSA's foot-dragging in drafting a method.

It is difficult to understand why EFSA needed 13 years to design a method for mixture toxicity assessment ('cumulative assessment'). Methods were available already in the beginning of this century in the US to calculate the toxicity of groups of pesticides (like organophosphates) based on their relative toxicity. EFSA however started from scratch and kept on producing opinions stating that mixture toxicity was not a real issue. PAN Europe evaluated the work of EFSA in 2014, see [Poisonous injection](#). The report reveals the existence of a network of industry-linked experts that managed to get seats in panels and working groups of EFSA and WHO. In EFSA 19% of the experts had a link to industry lobby group ILSI, and even the majority (52%) links with industry. Only an intervention of DG SANTE in 2011 put an end to EFSA's foot-dragging. Grouping of pesticides was started then based on toxicity (cumulative assessment groups, CAGs). Industry however didn't give up. A second part of their campaign was an EU-funded program called 'Acropolis' where a computer model (Monte Carlo) was promoted for the assessment of mixture toxicity. By smartly cooperating with national institutes, industry tried to promote this computer tool. A range of well-known ILSI-experts (Boobis, Moretto, Meek) assisted in Acropolis. Acropolis' objective was "to prove that the use of pesticides is safe" (see document attached). In the end, EFSA adopted the Acropolis-method for its assessment of mixtures.

¹ <https://www.efsa.europa.eu/en/efsajournal/pub/5348> , page 76/77

3. What is wrong with this computer modelling?

In the computer modelling the national pesticide residue monitoring data are mingled with diet data (what people eat on average) until a certain 'distribution' is obtained. The distribution shows that percentages of people get exposed to pesticides in a different way, some to a low extent, some middle, some high. The modelling outcome is "cut-off" at a certain percentage (mostly 99,9%) and this level is taken as the benchmark for risk assessment and comparison with health standards. Mixing residue data from an entire country with diet data however makes no sense. No consumer will buy their products in every supermarket in the country. They buy in one or two supermarkets, some only on local markets with entirely different residue patterns. The modelling therefore produces an outcome with unknown relevance. At least it has no similarity whatsoever with the real exposure of consumers. The modelling idea should be abandoned, it is unrealistic. Additionally there are very few diet datasets, and no diet data for specific groups, vegetarians, pregnant woman, migrants, etc. A simple adding of (the analysed level of) pesticides with similar toxicity (relative potency) would be the best alternative and provide adequate protection.

4. Today's ScoFCAH meeting.

Today in the Standing Committee ScoFCAH, https://ec.europa.eu/food/plant/standing_committees/sc_phytopharmaceuticals_en, management decisions are proposed for this flawed modelling system. These management decisions are of great importance for the outcome. What level of "cut-off" will be applied? How do non-detects count? Are processing factors included? Are variability factors included? For sure EFSA and Commission have tested all these factors to find out if this would lead to the need to limit or ban pesticides. And no doubt made sure that their assessment will have little impact on the availability of pesticides. And, while a public consultation at EFSA on mixture toxicity, <https://www.efsa.europa.eu/en/consultations/call/180626-0>, just closed last weekend, Commission likes to pour the factors into concrete, make the public consultation to a farce and 'bury' the topic of mixtures for years to come. And conclude, as they continued to do for decades, that food is and has been safe all the time.

Pesticide Action Network Europe

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Attachment:

- Acropolis flyer