

A full breakdown of all of this year's actions!



2016, A Year of Action for PAN Europe

Happy holidays from the whole team here at PAN Europe! For us it has been a very active year for our work and for pesticide legislation in general. See below for detailed information on:

Glyphosate - Following the declaration by the International Agency for Research on Cancer that Glyphosate is “probably carcinogenic” to humans, there has been much action to limit the use of glyphosate across Europe.

Endocrine Disruptors - The commission, sitting on its hands for years after being required to release regulatory criteria to limit Europeans’ exposure to Endocrine Disrupting Chemicals (EDCs), finally released the criteria this summer.

Members - This year we welcome two new members: Fundacion Alborada (Spain) and Earth Thrive (Serbia). We have a few other member organisations in the queue.

Many Court Cases and Quite a Few Victories!

Farm Visits

Testimonials from Victims of Pesticides

Pesticide Free Towns spreading across Europe!

Save The Date!

PAN Europe, IOBC, and IBMA are hosting the 5th Annual Symposium on the Sustainable Use Directive on Pesticides on February 7th, 2017 from 14h - 18h at the European Parliament.

You can register for the event by clicking [HERE](#):

A full event program will be available in January.

Here are some of the many things that have happened and are happening with regard to pesticide use and regulation this year:

AOP, the trojan horse for industry lobby tools?

AOP, the Adverse Outcome Pathway, is a tool for non-animal testing and an interesting research topic. Scientists working on AOP try to find out HOW adverse effects develop in the body. AOP could be used in some future for screening of chemicals with

unknown toxicity if it matures and shows good predictability of adverse effects. Use as a final decision-taking tool in chemical risk assessment is an illusion for the foreseeable future because AOP has an unknown level of prediction and cannot guarantee the high level of protection that is required by EU law. Current AOPs also fail to take into account the effects of mixtures of chemicals. But is this illusion not the hidden agenda of chemical industry? Getting rid of the expensive animal testing and substituting it by low-cost AOP? And even questioning any (undesired) outcome of animal testing? This could be inferred from the massive efforts industry is doing to help designing AOP. Millions of taxpayers' money are derived from the EU research programs to support these industry initiatives. Since AOP will be used to regulate chemicals that the general public is exposed to, one would expect that at least an independent body is at the steering wheel of AOP. But this is not the case. Government officials are closely operating with industry, without the presence of other public society stakeholders apart from animal-welfare groups. Industry is writing its own rules.

Those government experts involved in developing AOP in their enthusiasm easily forget that the situation at implementation level of risk assessment tools is totally different than the scientific atmosphere during the development phase. At the implementation level of Brussels risk assessment, scientific discussions are substituted by political wheeling and dealing and power play. Anything goes and science doesn't count that much anymore. This is the more the case given the unknown level of predictability of AOPs that allows for much speculation and assumptions, the so-called "expert judgement". A massive misuse of AOP can be foreseen if a chemical company starts fighting to get their chemical on the market, no matter how. Currently the first examples of this misuse can be observed already in the initiative of the fragrance industry to predict adverse effects solely based

on assumed similar chemicals of known toxicity. Also in the EU approval of pesticides the first examples can be observed; Health DG SANTE even allows overruling of adverse outcomes observed in experimental animal testing. Priority setting and assisting on filling data gaps for unknown chemicals should be the objective of AOP, not overruling adverse effects in animal experiments. The European Commission has to act to make sure AOP is only used as a first screening of unknown chemicals and stop the use in risk assessment and any other misuse.

Brussels 'mandarins' contribute to European Union's downfall.

European Court of Justice ruled that European Commission violated the laws on transparency and access to documents. Using vague and unsubstantiated arguments, the NGO, PAN Europe, was denied access to documents that might demonstrate who in the Commission was behind changing democratically approved policy on endocrine disrupting chemicals. This is just an example in a long row of cases where European Commission considers itself a special 'cast' of people that do not have to obey rules as other Europeans and do not care about the official policy on transparency of the EU. EU Commission services like to do business behind closed doors and keep the public at a distance.

Another example in the row is the re-approval of the pesticide Glyphosate. Being aware of the big resistance of the public against keeping the chemical on the market, EU Commission still reapproved it for some time without being backed by a qualified majority of the EU member states. EU-chair Mr. Juncker used this example in his "state of the union" speech to announce that the procedure of re-approval should be changed to be more 'political'. While hundreds of decisions are made by Commission behind closed doors without any public knowledge, Mr. Juncker clearly didn't like

the influence of the public on the decision-making in this single case and now is looking for a way to get rid of this undesired influence. Sleep well, dear European citizens, Mr. Juncker is watching.

The case of endocrine disrupting chemicals was also mentioned by Mr. Juncker in his speech as a topic that would need another way of decision-making. Not coincidentally on this topic again the public is concerned. Many citizens, as well as the scientific community, are unhappy about the lack of protection by EU Commission against the harms of this group of chemicals. Billions of costs and suffering of the public in terms of health effects are tolerated by EU Commission just to serve a handful of commercially interested parties and the crusade of the US for free trade.

Mr. Juncker and his Commission ignore the frustration and anger of large parts of the European public. In contrast to the Brussels illusions sold on “stimulation of jobs and growth”, many people experience the opposite, the loss of jobs by the blind globalization supported by the EU. Also people observe that the reduction of pensions and increase of retirement age as a result of the games played by the financial system are not put to a halt by the EU. Frustration is growing and the support for the EU is decreasing. The total negligence of the feelings of the public by Commission such as on Glyphosate or endocrine disruption likely adds to the mistrust and anger.

It's time for a complete U-turn in Brussels, to begin with getting people on board that really care about EU citizen' s and their concerns such as on health and the environment.

PAN Europe court victory on access to documents from civil servants.

PAN Europe won a legal case at the European Court of Justice against the EU Commission (DG Trade), for refusing to provide access to documents with information on endocrine disrupting chemicals (EDCs). Finally, a breath of fresh air for European democracy! Luxembourg court today, in a case filed by PAN Europe and supported by Sweden¹, rejected EU Commission's overused argument of "an ongoing policy" to deny the right for the public to access documents of Community institutions and bodies. This was one of the main arguments of the Commission's Trade Directorate, for refusing to provide full access to 36 out of the 55 documents PAN Europe had requested on EDCs².

The Court states that the general claim that the disclosure of documents undermines the decision-making process [Article 4(3) Reg. 1049/2001] on EDCs is not valid. The arguments that documents are of "preliminary nature" or for "internal use" cannot serve anymore for denying access to citizens. According to the Court, these are "general, vague and imprecise claims" and miss the overall objective of the Reg. 1367/2006 to create "an even closer union among the peoples of Europe, in which decisions are taken as openly as possible and as closely as possible to the citizens". If the Commission wishes to block access to documents using Article 4(3), it will have to provide precise and specific information, which failed to do here. This raises the bar very high for the Commission, which will prevent it from (mis)using this Article so frequently.

PAN Europe welcomes positively the court ruling. The "ongoing policy" argument is being used increasingly not only by EU Commission but by other institutions like Food Authority EFSA, to deny the public access to specific documents. This undermines the European law, for a united Europe, where European citizens have public access to information, participate in the decision-making process and have access

to justice in environmental matters.

Up to a few years ago, Article 4(3) was not used at all. This shows, according to PAN, that the attitude of EU institutions towards transparency is worsening and regulators prefer to overlook the law and deal behind closed doors, keeping European Citizens at a distance from public decisions.

Another widened SANTE derogation.

The European Food Safety Authority (EFSA), in the holiday period[1], published a 'protocol' for the implementation of a major pesticide derogation, Article 4.7 of Regulation 1107/2009. The derogation will be used for pesticides that are currently still on the EU market but are about to be banned based on the 2009-pesticide Regulation that includes "cut-off" provisions for classified carcinogenic, reprotoxic or endocrine disruptive pesticides[2]. Examples are the pesticides Glufosinate (causing birth defects), Epoxiconazole (birth defects, liver cancer), Flumioxazin (toxic for reproduction & for endocrine organs), Pymetrozin (cancers, reduction fertility & effects on endocrine organs). The derogation will allow use in specific crops in case of a "serious danger for plant health" in spite of the full ban of these pesticides.

In EFSA's opinion -very remarkably- herbicides can qualify for this derogation while the opinion itself states that "weeds in a strict sense do not directly pose a threat to plant health".

EFSA additionally thinks that due to the growing resistance of weeds against herbicides, for every crop in the EU, a range of herbicides need to be available with a different working spectrum. In some cases even 4

different classes of herbicides. This means that if three classes of herbicides are available for a given crop, the derogation still can be applied for the classified herbicide as the number 4 herbicide.

While EFSA mentions that priority has to be given to non-chemical methods[3], weed control such as mechanical weeding are easily dismissed by EFSA for being less applicable, reliable and effective.

PAN Europe feels that this protocol is a scandal. Weeds will in the worst case cause a reduction of the yield of a crop and not be a serious danger to plant health. Allowing herbicides to be part of the Article 4.7-derogation is a grave misuse of the rules.

Even worse is the policy embraced by EFSA on pesticide resistance. Instead of reducing the use of pesticides by sustainable practices (like crop rotation, mechanical weeding), EFSA promotes the all-out use of synthetic pesticides to fight weeds. Resistance caused by overuse of pesticides needs to be countered by use of more pesticides, according to the Authority. This is the chemical treadmill. A dead-end street. EFSA fully ignores the 'Sustainable use of pesticides Directive'[4] that provides that pesticides can only be used as a last resort. The panel at EFSA in the 'plant health group'[5] seems to have no knowledge of sustainable crop growing and dismisses available and widely used non-chemical methods.

[1] EFSA Journal August 4,
<http://www.efsa.europa.eu/en/supporting/pub/1060e>

[2] Regulation 1107/2009, article 4.1

[3] Directive 128/2009

[4] Directive 128/2009

[5] <http://www.efsa.europa.eu/en/plant-health/working-groups>

Landmark PAN Europe court victory on access to documents

EU Court makes it clear that all "information on the emission to the environment" should be released without restriction. Just as the Aarhus convention provides for.

This is really a landmark verdict; the public from now on can get all documents on chemicals, pesticides and industrial processes to check if the basis of environmental decisions is right.

Commission cannot state that only emissions from industrial production plants count, all emissions count, such as pesticides applied in the field.

Commission also cannot say that there should be a "link" in the information with the emissions; court ruled that a "relation" is good enough. Commission have to provide all documents and can only blacken certain parts that contain confidential information.

The PAN Europe/Greenpeace case on information on the production of Glyphosate, <http://curia.europa.eu/juris/documents.jsf?num=C-673/13> is referred back to the General Court since the General Court now has to decide on the documents requested in the light of the new definition made

today by the Court.

In a similar case by a Dutch Bee Foundation,

<http://curia.europa.eu/juris/documents.jsf?num=C-442/14> , Court explains that the requested documents on Imidacloprid, the substance dangerous to bees, should be released without restriction.

Implementation of the Sustainable Use Directive on Pesticides (SUDP)

Not a lot of revolutionary news regarding the implementation of the SUDP happened in 2016. The only new element was that the European Commission, DG SANTE, decided to move the responsibility for its implementation from one directorate to another, meaning that today the steering of its implementation is happening from Ireland...

To speed up the implementation and trying to ensure some EU steering PAN Europe has together with European Environment Bureau (EEB), Birdlife Europe and Asia, Greenpeace Europe and ClientEarth written an open letter to the director General of

DG SANTE, see (in English): <http://www.pan-europe.info/sites/pan-europe.info/files/public/resources/reports/NGOs%20letter%20Prats%20Monne%20-%20SUD%20implementation.pdf> recalling that they need to evaluate and ensure progress on the implementation and as part of that should have sent a report to European Parliament and EU Council two years ago, which remains unpublished...

A crucial part of the SUDP is that farmers, as of 2014, should be uptaking Integrated Pest Management, but there is a strong disagreement relating to what this actually is, and due to lacking steering from EU level, little concrete action is happening on this. As a result PAN Europe, together

with International Biocontrol Manufacturer Association (IBMA) and International Organisation of Biological Control (IOBC), been publishing a booklet 'IPM working with nature' illustrating for a number of main crops.

In 2016 we displayed this exhibition in the European Commission, DG environment, in European Economic and Social Committee, but also in the farmers unions COPA-COGECA as well as in the NGOs house Mundo B. We are now working with our members hoping that as from 2017 the IPM exhibition will move to Member States.

In 2016 we also decided to accompany the IPM exhibition with actual farm visits. We managed to organize two farm visits in the autumn: The first farm visit was organized in collaboration with IBMA to a IPM farm for apple and wine growing in Strassbourg France, in September. The farmer, Philippe Rothberger, who is in conversion to organic, gave the around 30 participants a detailed explaining of the different practices and products that he has been testing over the last 20 years.

The second farm visit was organized in collaboration with the region of Veneto in Italy, and this time we went to see a demonstration and research farm ValleVecchia managed by Lorenzo Furlan, to learn more about IPM in maize growing.

Pesticide free towns

In 2016 we expanded seriously the language versions of our website and guide, meaning that today participants can read in English, French, Dutch, German and even Portuguese. Soon we will also have the campaign ready in Italian.

A grant from the Belgium Lotterie allowed us to kick off a real Belgium wide campaign, where we asked the 589 towns to give us detailed

information regarding how it is going with moving to pesticide free and we have now managed to give a more complete overview of alternative systems used, see (in English, French and Dutch): <http://www.pesticide-free-towns.info/statistics-questionnaire>

To assist the change, we organized a webinar with the town of Ghent as part of the pesticide free work 2016, we organized a visit to Ghents parks for our members coming from all over Europe allowing them to discover how things can be done differently. To also involve and inspire more local groups we also in 2016 starting to film green services, mayors etc among other more progressive towns going pesticide free.

Two of our members, PAN UK in the United Kingdom and Quercus in Portugal also managed to organized local events to inspire towns going pesticide free. PAN Europe addressed both of these events, each time spreading the information that we have been collected so far, especially from Belgium.

Victims of pesticides

Générations Futures, have been working for many years with farmers who are victims of pesticides in France, helping them make sure their story is heard. They are collected on one homepage: <http://victimes-pesticides.fr/>

France has also managed to establish an organization assisting victims of pesticides: <http://www.phyto-victimes.fr/>

PAN Germany has also hosted a hot-line where potential victims could call to get advice, and has now also published a booklet giving the victims a voice, see: http://www.pan-germany.org/download/Kinder-Pestizide_web_F.pdf

Since 2015, PAN Europe has a homepage dedicated to victims of pesticides, trying to gather national initiatives but also adding new stories on from other parts of Europe, see: <http://www.pan-europe.info/campaigns/voices-pesticides-around-europe>

We started by publishing victims of pesticides from France and Italy and in 2016 we have been able to expand these stories to all cover stories from Latvia, Belgium, and the United Kingdom.

In France there has been increased awareness of the victims of pesticides, see recent article in English: <http://www.decanter.com/wine-news/pesticide-protest-bordeaux-349138-349138/>, There have been a number of important court cases of which probably the most known is the story about Paul Francois, certain diseases have been recognized as professional diseases by the public health insurance while the topic has also gotten a lot of media attention, most recent is the TV programme Cash Investigation, see (in French): <https://www.youtube.com/watch?v=bOSVKfmFusg>

Around Europe we see more and more people living around or next to the fields are starting to contest the uncontrolled pesticide spraying, starting with French citizens living around cereal and wine fields, see (in French) <http://victimes-pesticides.fr/riverains/>

An interesting fact is that this is also happening elsewhere in Europe. Citizens living next to the vineyards in the region of Prosecco are contesting see (in Italian):

<http://www.report.rai.it/dl/Report/puntata/ContentItem-9fd4c54c-528a-4a20-b5dc-8ceedfbd07e6.html> as are a group of Wallon citizens living next to cereal fields, see

(in French): https://www.rtf.be/info/regions/detail_pesticides-une-etude-demarre-pour-recenser-les-cancers-a-fernelmont?id=9251032

In France debates with farmers have started and new guidelines on how to produce more sustainable is being discussed, this is still not happening in neither Italy nor Wallonia.

On 7 December 2016 PAN Europe organized a workshop allowing all these different groups to meet first of all allowing them all to tell their story and to exchange experience, but also to discuss ways forward.

PAN Europe, bees and neonicotinoids

Since the beginning of 2016, a lot of valuable information and development arose in the area of bees, pollinators and pesticides.

First, the amount of scientific knowledge on the harm pesticides are causing to bees is becoming tremendous. Specifically on neonicotinoids, dozens, of publications continued proving that the use of these insecticides dramatically harms bees. Nobody can deny now that these insecticides are not only causing disorientation of bee foragers but also

lead to an important series of other consequences: queen mortality, sterilisation of drones (male bees), immunodeficiency, broad environmental contamination, etc. In the UK, a study even directly linked the decline of wild pollinators to the use of neonicotinoids on oilseed rape in UK.

In the area of risk assessment, the European Food Safety Authority (EFSA) has been carrying out a risk assessment on neonics on bees based on confirmatory data provided by the industry. The conclusions of EFSA are that neonicotinoids present a high risk to bees and that pesticide companies still failed to provide any indication that their insecticides are safe for bees. Game over for neonics? Not so fast...

The European Institutions as well as member states are under enormous pressure by pesticide companies and lobbies of the conventional agricultural sector. An enormous campaign of disinformation is running in Brussels and in EU capitals on how farmers' yields are at risk because of the (only partial) ban on neonicotinoids. Actually, official data show that no decrease has been observed in EU crop yields. Pesticide companies and the industrial farming sector are scaremongering people providing fancy figures such as a decrease of up to 92% in carrot yields without pesticides! Despite the figures are not factual nor science-based, the lobbying of industry is slowing down the process of kicking neonics out of the EU. Nevertheless, science and citizens are on our side:

'neonicotinoids' is a word known by so many people. Supported by our members and by citizens, we will fight back all these industry lies as well as provide factual and science based arguments to show that 1. Neonicotinoids are more than harmful to bees and 2. Show that neonicotinoids bring actually no real benefit to our society.

In November, Health Canada published its risk assessment of imidacloprid (one of the 3 highly bee-toxic neonics) on water biodiversity. The

conclusions of Health Canada are that they pose a high risk for aquatic environment, including when used in greenhouses. Based on the unmanageable and unacceptable risk imidacloprid pose to bees, Health Canada is planning to ban all uses of imidacloprid within 3 to 5 years. Thiamethoxam and clothianidin (the 2 other baddies) are now under evaluation.

2017 will definitely be a tough year for NGOs but it will certainly be a bad year for neonics!

Lunch-time debate on Ecological Focus Areas in the European Parliament

While ECPA and COPA-COGECA keep fighting against banning toxic pesticides, a very enlightening lunch-time debate on Ecological Focus Areas (EFAs) was co-organised by PAN Europe in the European parliament on December 1st.

Currently, farmers are asked to devote 5% of their land to so-called 'ecological focus areas'. PAN Europe and many member organizations have been fiercely criticizing the fact that pesticides are allowed in EFAs and that 'ecological' should be suppressed from the name.

In light of the recent decision from DG Agri to eliminate the use of pesticides in EFAs,

PAN Europe invited Pr. Felix Wäckers to a lunch-time debate to talk about the use of EFAs to promote the development of beneficial insects that will kill crop pests.

Professor Wäckers' presentation was highly enlightening and gave us even more confidence that a productive agriculture is possible with limited to no use of pesticides. Felix Wäckers indicated that the knowledge on crop pests, their natural predators and the plants needed to attract them is now developed enough to replace pesticides by beneficial insects. In his [presentation](#), Felix Wäckers gave us a few examples of the increase in yields. By planting 3-6 meter wide flowering strips every 100 meters in the field, yield increases were 12% for wheat, 26% for peas and 32% for carrots! In the same time, some farmers 'dared' stopping using insecticides and it worked well! So this means that dedicating 3% of the land to flowers increases yields minimum 10% and reduce or suppress insecticides expenses: positive for the farmers' profitability and positive for the environment and human health!

A few weeks before, ECPA had published its scaremongering 'Low yield' report indicating that potential future restrictions on certain pesticides will lead to a 92% reduction in carrots yield. 92% reduction versus 32% yield increases. On the one hand, completely fancy assumptions, on the other, hard work and field trials over several years. It is now our duty to make sure the work carried out by scientists and progressive farmers is not hidden by the fallacious statements of an industry trying to maintain its profits on the back of human health, the environment and farmers

PAN Europe together with PAN International at the Monsanto Tribunal at the Hague

In October 14-15th 2016, Monsanto was on trial in The Hague for crimes against humanity. Specific charges included human rights abuses and ecocide, the large-scale destruction of the environment, as part of an

international tribunal targeting the agro-chemical corporation. This was a moral [tribunal](#), organized by civil society groups to protest the lack of available legal tools to hold Monsanto accountable for its actions. The Tribunal assessed specific allegations of harm made against Monsanto, as well as the human health and environmental damage caused by the company throughout its history. Eminent judges will hear testimonies from victims and experts, including PAN Europe, PAN Germany, and PAN Asia Pacific. The panel of judges will deliver an advisory opinion following International Criminal Court Procedures.

PAN Europe, PAN Germany and PAN Asia Pacific presented the newly released [Glyphosate Monograph](#), a “state of the science” review done by PAN International scientists. The review presents a large body of research documenting the adverse human health and environmental impacts of glyphosate and glyphosate-based herbicides. This work underscores the need for a global phase-out and has been welcomed by environmental and health advocates as a wake up call for regulators, governments and users around the world. PAN Europe was also co-moderating three workshop at the Peoples’ Assembly running in parallel to the tribunal on ‘Pesticides and Toxic Chemicals’, where organisations from all around the world were presenting their stories in relation to harm caused by glyphosate and toxic pesticides. PAN Italy was also there to present how Mals / Malles Venosta, a small town in North Italy decided to go pesticide free, after running a referendum to ban pesticide use in the area. Overall the workshops resulted in sharing experiences, creating alliances across the world and building future strategies to face the crimes committed by the agrochemical industry.

Endocrine Disrupting Chemicals

PAN Europe launches [the EU tour EDCs website](#)

On June 15 2016, two years past its deadline the EU Commission proposed a set of ‘scandalous’ criteria to identify endocrine disrupting pesticides and biocides that in effect will fail to ban any such chemicals, leaving Europeans unprotected. Pesticides that are endocrine disruptors (EDs or EDCs for Endocrine Disrupting Chemicals) are currently being sprayed on the European fields and may be the cause of a wide range of endocrine-related diseases that have been observed in farmers, their children, residents, bystanders and consumers. They also contribute to the environmental and ecosystem degradation we are witnessing today. The criteria proposal reveals that the EU Juncker regime is actually dismantling the democratically agreed rules set to protect people against endocrine-related health effects (e.g. breast and prostate cancer) and child health (e.g. mental disorders), in order to reduce costs for industry, increase their profit and please the US, Canada, Australia and others in the trade negotiations (e.g. TTIP, CETA).

Only if a qualified majority of EU Member States votes in favor of the proposal, this will be approved and the criteria will be implemented. Europe now needs its “Heroes” to stand up; we need as many EU Member States to refuse Commissioner’s Juncker proposal for the EDC criteria. PAN Europe together with its members and allies have started a tour in Europe to make people aware of the disastrous proposal of Commissioner Juncker and stimulate national politicians to stand up for people's health. In Tallinn, The Hague, Brussels, Madrid, Vienna, Budapest, Lisbon and many other EU capitals and European cities, press conferences will be organised with top-level endocrinologists, medical doctors and health practitioners to inform the European countries about this scandal. It is now in the hands of each EU Member State to demand protection for our

people, our environment and the future generations.

PAN Europe meeting at the European Parliament

Within the framework of the [EU tour on EDCs](#), PAN Europe together with MEP Pavel Poc organised an “experts meeting” at the European Parliament on Wednesday 28th of September. Three main speakers - Jean-Pierre Bourguignon (Paediatric Endocrinology, Endocrine Society), Vito Buonsante (Law and policy advisor, Client Earth), and Susanne Classon & Maria Wallin (Swedish Chemical Agency; KEMI) openly criticized the scientific and legal flaws of the criteria. The Commission was also present. The meeting resulted in a very lively and intense debate among the Commission, stakeholders, Members of the Parliament and scientists, where the Commission had to respond many questions.

Further updates on EDC criteria

Following the criticism, the COM revised the proposal and presented a second draft of the criteria proposal which was discussed in the Standing Committee (SCoPAFF/section phytopharmaceuticals) on 18th of November. Although there were some improvements in comparison with the previous draft, the changes were characterised as “cosmetic” in the sense that the burden of proof remained too high to identify a chemical as an EDC and the “cut-off” element to remove EDC pesticides from use, is still not respected. Furthermore, the text as it is, is vague as it fails to give clear definitions. This leaves room for legal misinterpretation that will be easily misused by the chemical industry, and its lawyers, to allow the use of hazardous chemicals in the field. As a result, the European law will fail to protect humans (especially our most vulnerable, newborn babies and

babies in the womb), animals, the environment and its ecosystems from exposure to EDCs.

In a third attempt, following the Member States' feedback, the COM updated once again the criteria and this time has split the annex in two part, hoping that in the next Standing Committee on December 21st a qualified majority of the Member States will vote in favour for at least one of the documents. However, not only the Commission didn't do any substantial changes but has also added a further exception to allow pesticides that are endocrine disruptors to non-target organisms to be used, even if adverse effects are present.

PAN Europe has been working closely with its members, civil society groups and the EDC-free coalition to raise public awareness on these crucial political procedures by sending letters to the EU Health, Environment and Agriculture Ministries, and carrying out the analysis of the legal EDC criteria text. Furthermore, we have been working together with scientists, Member States and members of the parliament to keep the pressure to select a set of scientific criteria that will efficiently protect Europeans and their environment from the harm caused by EDCs.

Environmental Risk Assessment

PAN Europe was invited to give a presentation on Environmental Risk Assessment at the EFSA conference in November 2016, the title of the presentation was "Environmental Risk Assessment: Environment Unprotected?". Our environment receives a wide range of anthropogenic pressures: expansion of cities, road networks and traffic, air pollution,

industrial and domestic river effluents, and of course the expansion of agricultural land and use of pesticides. Pesticides are intended to be toxic to pests and are also toxic to other living organisms and non-target species. Their use contributes to the degradation of ecosystems we experience today. For example, pesticides are an underlying cause of the decline in the population of pollinators and the chronic toxicity observed in aquatic ecosystems. The Pesticide Regulation underscores to protect these ecosystems but our current Environmental Risk Assessment (ERA) and Risk Management is failing to do so. Improvement is necessary not only in ERA but also in the implementation of the pesticide regulation by Member States.

PAN Europe's presentation focused particularly on ERA of pesticide active ingredients and how it fails to protect the already vulnerable environment and its ecosystems from the harmful effects of pesticides. Current ERA despite being very long, expensive, complex and extremely technical in most cases fails to reflect real exposure levels in the environment resulting in chronic toxicity of its ecosystems. Our aim was to inform and encourage EU Regulators, Member States, National and European Authorities to improve ERA so all pesticides that cause harm are identified and gradually removed from use in agriculture and open fields. This has to become an incentive for the industry sector and Member States to develop non-toxic alternative methods for pest control and limit to the minimum the environmental destruction that our current agricultural practices create.



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