Pesticide Action Network Europe

Parkinson.

Brussels, 9-10-2023

Contact : Hans Muilerman
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To: Ms. Kyriakides
European Commissioner for Health and Consumer Policy
European Commission
B-1049 Brussels.

Concerning: EFSA's intentional blockade of Parkinson testing of pesticides.

Dear Ms. Health Commissioner Kyriakides, on 25-2-2022 we sent you a letter on neurotoxic effects of pesticides and urged you to oblige pesticide applicants to do chronic neurotoxicity testing of the active substances they like to place on the market. Sadly we did not receive a reply from your side. Not only by this missing reaction, but also in general we do not see any progress in protecting the public against the known chemical causes of neurodegenerative diseases such as Parkinson, while the incidences of these diseases keep on rising rapidly (30% increase in the last 10 years).

EFSA organised a workshop in 2022 and a consensus (including 8 EFSA staff) could be reached, see page 7 of the attached minutes of the workshop. We quote: "*The participants discussed on which test assays should be included in a test battery for the assessment of both Parkinson's Disease and Parkinson Syndrome, considering in vitro studies and TK analysis. Based on the general neuronal AOP network (that includes both Neurotoxicity and Developmental Neurotoxicity), the most relevant assays to PD would be the ones relative to KE that measure mitochondrial disfunctions, neuron inflammation and dopaminergic degeneration. More specialised assays could be then added (i.e., dopamine receptor signalling, disturbance of the signalling system). In general, a test battery including neurodegeneration and mitocondrial toxicity assays could be a potential screen one tier to identify chemicals of concern. Nevertheless, it should be considered that the test battery to be used closely depends on the KE considered and in the case of PD, focusing on mitochondrial toxicity might miss part of the pathways relevant for the AOP*".

Parkinson's disease is pathologically demonstrated in the brain region called substantia nigra where the cells producing the hormone dopamine gradually stop producing it. At the time the disease symptoms are visible (trembling and such) the disease is already at a late and non-recoverable stage (60-70% of the cells stopped producing dopamine). Experts recommend that to identify the pesticides causing Parkinson at an early stage of the disease, it would be obvious to expose test animals to pesticides, carry out a pathological assessment and -among others- count the number of cells (still) producing dopamine.

The approach adopted by EFSA, https://www.efsa.europa.eu/en/events/webinar-environmental-neurotoxicants-advancing-understanding-impact-chemical-exposure-

brain, however doesn't mention Parkinson at all, nor the need to study the pathology of substantia nigra, or the vitality of dopamine producing cells. Leading experts like Prof. Bloem and national institutes like Dutch RIVM were stunned to see this EFSA-move[1] to disregard the consensus reached. They expressed their discontent in a joint letter to EFSA.

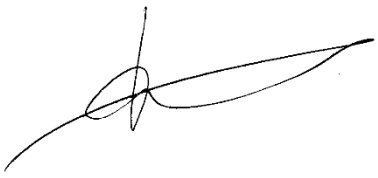
EFSA, in this new multiyear research programme, intends to study mitochondria and exclude animal testing. A futile programme since this research is a repetition of a previously commissioned EFSA study. After 3 or more years of wasting time and public money this way, there still will be no test available for identifying the pesticides that cause Parkinson.

Why is this? Why is EFSA not interested in preventing diseases caused by pesticides? Food Authority EFSA seems to go its own way, pursuing its own narrow-minded approach of non-animal testing and NAM's (New Approach Methodologies) by definition, to reduce costs for industry, no matter if the public will be protected or not.

We ask for your intervention. This grave unscientific misconduct of EFSA should not be accepted. We urge you to put the topic of identifying pesticides that could cause neurodegenerative diseases such as Parkinson on the agenda of the next ScoPAFF and propose relevant testing protocols, including animal testing if needed, based on the important amount of scientific information. A working group with independent scientists could also be a way forward to quickly identify relevant testing protocols that, as a next step, shall be included in the pesticide data requirements.

We also ask you to start an investigation into the conduct of the EFSA management in this matter and make sure that the necessary steps are being taken to prevent this very serious kind of event in the future.

We hope for your support,
Sincerely yours,



Hans Muilerman,
Pesticide Action Network, Brussels.

[1] https://www.groene.nl/artikel/de-gezondheidsrisico-s-van-glyfosaat