Pesticide Action Network Europe

To: members of the PAFF committee - Section "Phytopharmaceuticals - Legislation"

Brussels, 6th December 2023

Subject: EU Standing committee on Plants, Animals, Food and Feed - 11/12 December 2023 - position of Pesticide Action Network (PAN) Europe

Dear members of the PAFF committee,

On 11 and 12 December, you are invited to the EU Standing Committee on Plants, Animals, Food and Feed to discuss and/or adopt opinions on several proposals of the European Commission. In advance of this meeting, below please find PAN Europe's position on certain issues that relate to the protection of human health and the environment, for which we kindly request your particular attention.

Agenda issues:

1. Proposal for non-renewal of the approval of asulam sodium
2. Proposal to extend the approval of 13 active substances including 5 PFAS and an endocrine disrupting substance
3. Proposal defining data requirements for the approval of safeners and synergists and establish a work programme for the gradual review of safeners and synergists on the market
4. Proposal to renew the approval of metrafenone
5. Proposal for non-renewal of the approval of dimethomorph
6. Proposal for non-renewal of the approval of mepanipyrim
7. Proposal to withdraw the approval of acibenzolar-S-methyl
8. Proposal for renewal of approval of trinexapac as trinexapac-ethyl
9. EFSA conclusions on mecoprop-p
10. Renewal report on metribuzin,
11. Guidance documents
12. Article 53
13. PAN Europe's contributions on other issues: PFAS, pendimethalin, Braunschweig meeting

1. Proposal for non-renewal of the approval of asulam sodium (B.01)

PAN Europe reiterates its support to the Commission's proposal for non-approval of asulam sodium. While the applicant has now withdrawn the application for approval, the explicit ban of the substance remains urgently needed considering its endocrine disrupting properties identified by EFSA in 2021, namely its interference with the thyroid function in humans. Thyroid disruption may cause developmental defects, tumours, hypo or hyper functions of hormones[1]. The exposure of pregnant women is of particular concern due to the risk of neurological damage to unborn children[2]. In line with Article 4(1) and Point 3.6.5 of Annex II of Regulation (EC) 1107/2009, pesticide substances having *"endocrine disrupting properties that may cause adverse effects in humans"* cannot be approved in the EU. Point 3.6.5 of Annex II indicates that any contact with humans must be prohibited to ensure the high level of protection of human health, including that of the most vulnerable groups, animal health and the environment in line with Recital 8 and Article 1(3) of Regulation (EC) 1107/2009. Furthermore, as thoroughly explained in a letter to Ms. Commissioner Kyriakides, asulam sodium cannot be considered as meeting the strict requirements of Article 4(7).

We call on you **to uphold the Commission's interpretation of Article 4(7)** and **support the Commission's proposals for non-approval of asulam sodium.**

2. Proposal to extend the approval of benzovindiflupyr, bromuconazole, buprofezin, cyflufenamid, fluazinam, fluopyram, flutolanil, lambda-cyhalothrin, mecoprop-P, mepiquat, metsulfuron-methyl, phosphane and pyraclostrobin (B.02)

PAN Europe has always been highly critical of the systematic practice of the Commission and Member States of extending substances' approval period where the (re)approval procedure has not been completed within the legal timeframe. Particularly, when this prolongation concerns substances, for which there is evidence indicating they are harmful to humans and/or the environment. This time again, the proposal under discussion at this meeting is particularly worrying given the hazardous properties of the substances proposed for prolongation. The proposal covers one substance, which has been identified as an endocrine disruptor by EFSA, several substances for which critical areas of concern have been identified and 5 substances listed as PFAS in the European proposal for a universal restriction of PFAS and for which we note several issues regarding their toxicity in their pesticide approval dossiers. This clearly demonstrates that this practice contravenes the strict approval requirement of Regulation (EC) 1107/2009 and

[1] Murthy MB, Murthy BK. Thyroid disruptors and their possible clinical implications. Indian J Pharmacol. 2012 Jul-Aug;44(4):542-3. doi: 10.4103/0253-7613.99351. PMID: 23087529; PMCID: PMC3469971.

[2] Boas M, Feldt-Rasmussen U, Main KM. Thyroid effects of endocrine disrupting chemicals. *Mol Cell Endocrinol*. 2012;355(2):240-248. doi:10.1016/j.mce.2011.09.005

undermines its primary purpose of ensuring a high level of protection of human and animal health and the environment.

- Buprofezin: according to EFSA's overview table of the endocrine disrupting assessment of active substances, Buprofezin is an endocrine disrupting substance for humans. Hence, it does not meet the approval criteria set out Article 4(1) and Point 3.6.5 of Annex II of Regulation (EC) 1107/2009
- Mecoprop-P: for this substance, which was already prolonged for more than 9 years, EFSA identified two critical areas of concern which means the substance does not meet the approval criteria set out in Article 4(1) of Regulation (EC) 1107/2009. Namely, the predicted level of exposure of children entering treated areas could not be regarded as safe (even by applying a buffer strip of 10 m and a drift reduction during application) and a high long-term risk to wild mammals was concluded for all representative uses.
- Benzovindiflupyr: in 2015, EFSA identified a high risk to aquatic organisms in the majority of the scenarios implementing risk mitigation measures. This led to the identification of a critical area of concern, which should have pre-empted the approval of the substance. Furthermore, it is suspected that Benzovindiflupyr has endocrine disrupting properties based on the effects observed in the reproductive system of the two-generation reproductive toxicity study.
- In line with the proposal of a European restriction of PFAS, cyflufenamid, fluazinam, fluopyram, flutolanil, lambda-cyhalothrin are PFAS substances. According to their application dossiers, these substances are particularly harmful to the environment (persistence, aquatic toxicity, endocrine disruption in wildlife). Some are also of concern for human health (e.g. lambda-cyhalothrin, which is consistently reported in the scientific literature to have endocrine disrupting and neurotoxic properties). Nevertheless, this proposed extension permits them to be deliberately and directly emitted into the environment, as well as contaminating EU citizen food.

We call on Member States to **reject this Commission's proposal in line with the Regulation (EC) 1107/2009 and to increase their resources** to remedy such systematic delays in pesticide risk assessment.

3. **Proposal defining data requirements for the approval of safeners and synergists and establish a work programme for the gradual review of safeners and synergists on the market (C.01)**

PAN Europe welcomes this overdue proposal with which the Commission, almost 9 years late, intends to fulfil its obligation under Article 26 of Regulation (EC) 1107/2009. PAN Europe is currently examining this draft proposal following its publication on 22 November on the Commission's consultation platform "Have your say". The proposal is open for comments from stakeholders until 20 December. Given this procedure and its timetable, we are surprised to see

that the proposal is being submitted for discussion under Section C before the end of this consultation period and the review of the received comments by the Commission. In our view, this appears as if the Commission perceives this feedback mechanism as nothing more than a "tick-in-the-box exercise", instead of truly engaging in dialogue and participatory decision-making.

4. Proposal to renew the approval of metrafenone (C.04)

PAN Europe expresses its disagreement with the European Commission's proposal to renew the approval of metrafenone. This is contrary to Regulation (EC) 1107/2009 and the underpinning precautionary principle, which requires that approved substances are deemed to have no unacceptable effects on the environment, including no endocrine disrupting effects on non-target organisms. In 2023, EFSA published the conclusions on its endocrine disrupting assessment of metrafenone in accordance with the criteria established in Regulation (EU) 2018/605. While it concluded that the criteria according to point 3.6.5 of Annex II of Regulation (EC) No 1107/2009 were not met for the EAS- and T-modalities, EFSA highlighted that further data were required to investigate the endocrine activity through the T-modality for non-target organisms. Hence, no conclusion could be drawn with regard to the endocrine disrupting properties of metrafenone on non-target organisms, contrary to point 3.8.2 of Annex II of Regulation (EC) 1107/2009. Indeed, according to all peer review experts and in line with OECD TG 248, the results from the Xenopus eleuthero embryonic thyroid signalling assay (XETA) provided by the applicant to investigate the T-modality of metrafenone for non-target organisms, was equivocal and additional information were needed to conclude on the ED potential of the substance.

While the results of the XETA test showed positive effects at the lowest tested concentration when using mixed effects ANOVA (statistical method), experts highlighted that it should not be concluded that the XETA is negative (shows no effect). Indeed, discrepancies of results were obtained when applying other statistical methods recommended in the OECD TG 248. Furthermore, and in line with OECD TG 248, experts considered that individual run should be further investigated for reproducibility of the dose response curve and that it should be considered whether the test has to be repeated. In its conclusions, EFSA points at the need for "*Additional information to fully investigate the endocrine activity through the T-modality for non-target organisms (i.e. a valid and reliable XETA). If the XETA is positive, a mode of action (MoA) should be postulated and further data would be needed to further investigate adversity (i.e. a Larval Amphibian Growth and Development Assay (LAGDA))*" In view of this clear consensus, and given that endocrine disruption posed by active substances stands as one of the cut off criteria laid down in Regulation (EC) No 1107/2009, it is unacceptable that the Commission is proposing to renew the approval of the substance metrafenone.

We call on Member States to reject this Commission's proposal in line with the Regulation (EC) 1107/2008 and the precautionary principle.

5. Proposal for non-renewal of the approval of dimethomorph (C.05)

PAN Europe strongly supports the long-awaited Commission's proposal for non-renewal of approval of dimethomorph. Since September 2019, dimethomorph is classified as damaging fertility (toxic for reproduction category 1B) under Regulation (EC) 1272/2008. Based on EFSA's conclusions published in May 2023, it is now also considered to have endocrine disrupting effects on both humans and wild mammals as non-target organisms. In accordance with points 3.6.4, 3.6.5 and 3.8.2 of Annex II of Regulation (EC) 1107/2009, such a harmful substance cannot be approved unless exposure to humans and non-target organisms is found negligible. From EFSA's conclusions, it is clear that both dietary exposure (food intake and drinking water) and non-dietary exposure (operators and residents) are not negligible for the representative uses, which can't be deemed to be addressed by any risk mitigation measures. As a result, it is clear that dimethomorph does not meet the approval requirements laid down in article 4(1) to (3) Regulation (EC) 1107/2009. Namely, the substance meets three cut-off criteria. Its presence on the market thus runs counter to the obligation for Commission and Member States of ensuring a high level of protection of human, animal health and the environment of Regulation (EC) 1107/2009.

We call on you to support the Commission's proposal for non-renewal of approval of dimethomorph.

6. Proposal for non-renewal of the approval of mepanipyrim (C.06)

PAN Europe supports the Commission's proposal for non-renewal of the approval of mepanipyrim. In August 2023, EFSA published its conclusion on the updated peer review of the risk assessment of the active substance mepanipyrim. This update results from a Commission's request from 2019 to assess the active substance in light of the new scientific criteria to identify endocrine disrupting properties of active substances, laid down in Commission Regulation (UE) 2018/605. According to EFSA's findings, mepanipyrim meets the endocrine disruption criteria for the EAS-modalities for both human health and non-target organisms. This stands as a first critical area of concern. Namely, mepanipyrim was found to induce histopathological changes in the testicular seminiferous epithelium in male rats, deregulate oestrus cycle and ovarian follicular cysts in female rats, as well as to lead to the occasional occurrence of uterine endometrial hyperplasia, hydrometra and uterine adenocarcinoma, and decrease the prostate weight in male dogs. No evidence showing that the conditions of negligible exposure or of the derogation under Article 4(7) could be met was provided by the applicants or any Member States during the periods of submissions specified in Article 14(1)(a) of Commission Implementing Regulation 844/2012. Therefore, in line with Article 4 (1) to (3) and points 3.6.4, 3.6.5 and 3.8.2 of Annex II of Regulation (EC) 1107/2009, mepanipyrim does not meet the approval criteria. Furthermore, a

second critical area of concern by EFSA points out a high long-term risk for wild mammals for all representative uses *via* dietary exposure. These findings come on top of mepanipyrim's harmonised classification as suspected of being carcinogen (category 2) and as particularly toxic for aquatic organisms with long term effects (Aquatic acute category 1; Aquatic chronic category 1) under Regulation (EC) 1272/2008. Therefore, it is clear that mepanipyrim causes both harmful effects on the human health and animal health and unacceptable effects on the environment, which must preclude its renewal in accordance with Regulation (EC) 1107/2009. Yet, the approval period of mepanipyrim has been repeatedly extended over the last decade and is now due to expire in March 2025 (initially expiring in October 2014). In accordance with Regulation (EC) 1107/2009 and Article 14(2) of Commission Implementing Regulation 844/2012, the Commission proposal for a non-renewal of the approval of this substance should take effect as soon as possible.

We call on you to support the Commission's proposal for non-renewal of the approval of mepanipyrim.

7. Proposal to withdraw the approval of acibenzolar-S-methyl (C.07)

PAN Europe supports the Commission's decision to review and withdraw the approval of acibenzolar-S-methyl in line with Article 21 of Regulation (EC) 1107/2009. The approval of acibenzolar-S-methyl was renewed in 2016 on the condition that the applicant submits additional information. This information was related to the relevance and reproducibility of the morphometric changes observed in the cerebellum of foetuses linked to exposure to acibenzolar-S-methyl and to examine whether these changes may be produced via an endocrine mode of action. In addition, the applicant was requested to submit further data by 2019 to carry out its endocrine disrupting assessment in light of Regulation (UE) 2018/605. In 2020, EFSA and the Rapporteur Member States (France) considered the confirmatory data were incomplete and could not conclude on the endocrine disrupting properties of the substance. As a result, the Commission requested EFSA to carry out a peer review to further assess the endocrine disrupting properties of acibenzolar-S-methyl. Conclusions, published in June 2021, show that based on the extraordinarily incomplete data set provided by the applicant compared to what is asked in EFSA/ECHA (2018) Guidance, none of the suspected endocrine disruption modalities can be ruled out for humans (E, A, S and T) and for non-target organisms. On the contrary, valid concerns remain, namely because of the outcome of the developmental neurotoxicity study, which showed morphometric changes in the cerebellum and increased auditory startle amplitude. Thus, the applicant has failed to provide the data required in time for its substance to continue to be approved in the EU. It is important that, after all these years, the identified concerns lead to a ban of the substance according to the approval criteria of Regulation (EC) 1107/2006 and the precautionary principle.

We call on you to support the Commission's proposal to withdraw acibenzolar-S-methyl

8. Proposal for renewal of the approval of trinexapac as trinexapac-ethyl (C.08)

PAN Europe takes note of EFSA's updated peer review conclusion that Trinexapac-ethyl does not meet the endocrine disrupting criteria set out in points 3.6.5 and 3.8.2 of Annex II of Regulation (EC) 1107/2009. However, the conclusions of this ED assessment do not address all concerns about the substance, namely those identified by EFSA in 2018. Firstly, EFSA could not determine whether the batches used to conduct the mammalian toxicity studies were representative of the technical specification proposed by the applicant due to data gaps. Further information was deemed necessary to exclude the relevance of some impurities (5 and 9) suspected of being genotoxic. This stands as a critical area of concern as no safe use could be identified for any of the representative uses. Secondly, EFSA could not finalise the consumer risk assessment for water and food consumption. Finally, the substance is classified as very toxic to aquatic life with long lasting effects under Regulation (EC) 1272/2008.

We call on you to reject the Commission's proposal to renew the approval of trinexapac-ethyl

9. EFSA conclusions on mecoprop-p

In October 2023, EFSA published its updated peer review on mecoprop-p following its endocrine disruption assessment. Overall, EFSA concluded that the endocrine disrupting criteria of points 3.6.5 and 3.8.2 of Annex II of Regulation (EC) 1107/2009 were not met for the EATS-modalities for humans and non-target organisms. Regardless of these conclusions, mecoprop-p cannot be considered to meet the approval criteria of Regulation (EC) 1107/2009 with regard to the two critical areas of concern identified by EFSA, first in 2017 and again in 2023. Firstly, mecoprop-p poses a high long-term risk to wild mammals in all representative uses. Secondly, worker exposure to the substance is predicted to be above the Acceptable Operator Exposure Level (AOEL) for all representative uses. It is also classified as very toxic to aquatic life (Aquatic Acute 1) and very toxic to aquatic life with long lasting effects (Aquatic Chronic 1) as well as harmful if swallowed and causing serious eye damage under Regulation (EC) 1272/2007. Therefore, since 2017, it cannot be concluded that the substance is not harmful to human health or does not have any unacceptable effects on the environment. Nevertheless, the approval of mecoprop-p has been extended for 9 years and a half. It is high time that citizens' and environmental exposure to this hazardous substance ends.

We call on you to invite the Commission to oppose the proposal to extend the present approval of mecoprop-p (B.02) and to swiftly propose its non-renewal.

10. Renewal report on metribuzin

In August 2023, EFSA published its conclusion of the peer review of the pesticide risk assessment of metribuzin. It lists three critical areas of concern, which in line with Article 4(1) to (3), preclude the reapproval of metribuzin:

- Metribuzin meets the endocrine disruption criteria for humans for the T-modality according to point 3.6.5 of Annex II of Regulation (EC) 1107/2009 and Commission Regulation (EU) 2018/605. No information was submitted by the applicant to demonstrate that dietary and non-dietary exposure to metribuzin is negligible or to demonstrate that the conditions for derogation under Article 4(7) of Regulation 1107/2009 are met during the eligible period for submission set out in Article 14(1)(a) of Commission Implementing Regulation 844/2012.
- Bystander and resident exposure estimates exceed the AOEL value.
- A high risk to bees could not be excluded based on the available studies.

Moreover, metribuzin is classified as acutely toxic when ingested (category 4, H302) particularly toxic for aquatic organisms with long term effects (Aquatic acute category 1; Aquatic chronic category 1) under Regulation (EC) 1272/2008. To ensure a high level of protection of human health, animal health and the environment, and line with the approval criteria set out in Article 4(1) to (3), metribuzin cannot be renewed. Considering its approval period was initially due to expire in September 2017 and has been continuously extended (now until February 2025), a non-renewal decision should occur in the shortest delay.

We call on you to invite the Commission to propose a non-renewal of the approval of metribuzin.

11. Guidance documents

EFSA Guidance Document on the risk assessment of plant protection products on bees

PAN Europe welcomes the updated version of the Bee Guidance Document recently published by EFSA. Since the first alerts on the decimation of honeybee hives due to neonicotinoids, and the failure of the risk assessment procedure to identify in advance these risks, it is evident that risk assessment of pesticides on bees is of major importance. Pollination ecosystem services represent ~15 billion euros, while they also ensure the perennity of wild plants.

Ten years after the publication of the first version of this guidance document, PAN Europe reiterates its call on the Member States to **endorse this new guidance document without delay**. Nevertheless, we would also like to reiterate our criticism of the 10% mortality accepted by Member States. Considering that bees are exposed to a cocktail of pesticides simultaneously with other stressors such as pathogens or lack of resources, PAN Europe considers that this figure is unsustainable and might reduce the positive impact of the progress made with the new Bee Guidance Document. We therefore ask Member States to **review their position and reduce it to 3%.**

Guidance document on Terrestrial Ecotoxicology

While we welcome the announcement that the revision of the overdue guidance document on terrestrial ecotoxicology now stands as a priority, we are still waiting to see concrete progress to increase the level of protection for biodiversity and ecosystems. In light of the poor state of insects and biodiversity in agricultural areas and their surroundings, it is unacceptable that its 2002 version is still in use. The current guidance sets a threshold for insects of 2 x LD50 in the field, potentially causing 100% mortality, while assuming the possibility of 'recovery' within the same season. However, in reality, insect populations are dramatically declining. This guidance document was prepared and adopted under totally unacceptable conditions as regards to transparency, independence and participation and is as a result far from being in line with the current science. Its design took place during the EPPO/SETAC meetings ('named 'ESCORT) which were chaired by a Novartis-employee and included a range of other industry-employees from Novartis, Bayer, Zeneca and Rhone-Poulenc), while other stakeholders were not invited. This ensures a 'desired outcome', i.e. a guidance document that does not restrict the approval of pesticides highly toxic for terrestrial organisms.

We call for an urgent revision of the guidance document on terrestrial ecotoxicology with independent scientists with a proven track record of published peer-reviewed articles in scientific journals and who never worked for industry nor did any consultancy for industry in their entire career. The guidance document and protocols for risk assessment should be in place by the end of 2024

12. Article 53

In January 2023, the Court of Justice of the EU published its preliminary ruling with regard to the scope of Article 53(1) on emergency authorisation for pesticides. The issue was brought to the Court initially in the context of a case on seed treatments with thiamethoxam and clothianidin used in sugar beets in Belgium. Nevertheless, the scope of the Court's ruling is broader with regard to

the substances, the uses and the Member States concerned. Contrary to what the current delays in the official recognition of the ruling by Member States suggest, the verdict is very clear and requires immediate implementation from the Member States and the Commission, to ensure that harmful substances that have been banned because of their toxicity are not used in agriculture.

The Court reminded that the objective of Regulation (EC) 1107/2009 is *"in particular to ensure a high level of protection of human health and animal health and the environment"* (46). It is therefore in the light of this objective that the entire Regulation must be interpreted: "*it should be borne in mind that* [Regulation (EC) 1107/2009] *provisions* [including Article 53(1)] *are based on the precautionary principle in order to prevent active substances or products placed on the market from harming human or animal health or the environment"* (47). This is further clarified in the following statements of the Court: *"The provisions governing authorisations* [including Article 53(1)] *must ensure a high standard of protection and that, in particular, when granting authorisations of plant protection products, the objective of protecting human and animal health and the environment should '**take priority**' over the objective of improving plant production"* (48). "*Consequently, it should be demonstrated, before they are placed on the market, not only that plant protection products present a clear benefit for plant production but also that they do not have any harmful effect on human or animal health* [i.e. that they meet the approval criteria of the Pesticide Regulation laid in Article 4]" (49).

This means that Article 53(1) cannot be applied to pesticides containing substances that have been banned or their use has been significantly restricted as a result of their harmful effects on human and animal health or due to their unacceptable effects on the environment. The Court makes no distinction on uses and warned that a different interpretation of Article 53(1) "*run(s) counter to the objection of Regulation* [(EC) 1107/2009] *(...) and give(s) priority to the improvement of plant protection over the protection of human and animal health and the environment"* (50). In other words, granting emergency authorisations to products based on active substances whose approval or renewal has been rejected is illegal.

We urge all Member States to **acknowledge the complete scope of this binding ruling** and to swiftly implement it by immediately **stopping granting emergency authorisations to products containing EU-banned or restricted active substances**. Consequently, the current guidance document should be updated to reflect the court ruling.

13. PAN Europe's contributions on other issues

a) New report by PAN Europe and Générations Futures, Europe's toxic harvest, unmasking PFAS pesticides authorised in Europe", November 2023

Our report looks at the **presence and toxicity of PFAS among EU-approved active substances in pesticides** and questions the current proposal to exclude these substances from the scope of the EU-wide PFAS restriction. Indeed, the main argument to that time-unlimited derogation is that these substances are sufficiently regulated under the Regulation (EC) 1107/2009. Our analysis, however, shows that this is not the case.

The main findings of our report are the followings:

- In Europe: 37 active substances currently approved for use in pesticides are PFAS, representing 12% of all synthetic substances approved in conventional agriculture.
- In France 30 PFAS pesticide active substances are currently authorised, i.e. 13% of all synthetic substances authorised. Their sales have more than tripled since 2008. In 2021, 2332 tonnes of PFAS active substances will be sold in France. German data suggest the same problematic growth in terms of PFAS pollution due to pesticides.

Our analysis of the authorisation dossiers of the 10 PFASs with the highest sales in France demonstrates that the majority of these substances are persistent in the environment or give rise to persistent metabolites such as TFA. In addition to being persistent, some of these PFAS AS have other toxic properties. For others, uncertainty remains due to a lack of thorough assessment of their metabolites, their endocrine disrupting properties and their impact on the environment and ecosystems. This gives rise to concerns for their impact on the environment and/or human health.

Our policy demands

1. Long-term solution: the **inclusion of pesticide active substance within the scope of the PFAS restriction** to ensure a comprehensive phasing out of PFAS pesticides' manufacture, marketing and import in Europe.
2. Direct action: the improvement of the implementation of Regulation 1107/2009 until the restriction enter into force, namely by:

- Considering **persistence of active substances & their metabolites as an "unacceptable effect on the environment"**, in line with the REACH restriction proposal.
- Strictly applying the approval requirement and the precautionary principle by precluding/putting an end to the approval of active substances meeting a cut off criterion or for which EFSA identified critical areas of concerns or for which the assessment of the approval criteria was not finalised due to data gaps.

b) Pendimethalin

PAN Europe is surprised to see that the ongoing confirmatory information procedure on pendimethalin is not on the meeting agenda. In October[3], we demonstrated that the information submitted by the applicant on the bioaccumulative potential of pendimethalin should, in accordance with Regulation (EC) 1107/2009, immediately lead to a **ban on this PBT substance**.

c) Braunschweig meeting with the pesticide industry as exclusive guest

On 4 December, PAN Europe wrote to Commissioner Kyriakides raising concerns and ultimately to condemn the organisation of a three-day workshop with competent authorities in Germany to which only representatives of the pesticide industry had been invited. We refer to the 5-7 December 2023 workshop meeting in Braunschweig called 'Zonal Authorisation Procedure Improvements and Developments' (ZAPID), organised jointly with the Federal Office of Consumer Protection and Food Safety of Germany. It is already the second time that the pesticide industry, after Dublin in 2016, is offered this unique opportunity to directly access to representatives of the Commission and Member States and create personal bonds with them using the excuse of improving the zonal system. It also comes on top of a whole series of secret meetings to which the other stakeholders are not invited, giving the pesticide industry the opportunity to influence EU Regulators to further decrease the protection of EU citizens and their environment (PAI WG in 2017, SUR meeting in 2018, EPPO expert group on minor use in 2018 etc). This is contrary to Article 36(1) of the Pesticide Regulation (EC) 1107/2009 and Article 6(2) of the EU Food Law (EC) 178/2002, which both require an "independent, objective and transparent" risk assessment of pesticides. This also undermines the requirement for the protection of human and animal health and the environment to prevail over commercial interests. **PAN Europe asked the EU Commission to reverse course and stop organising this kind of industry-privileged meetings.**

From beforehand, thank you for your consideration.

Sincerely,

Angeliki Lysimachou
Head of Science and Policy
Pesticide Action Network Europe

[3] PAN Europe's letter to SCoPAFF_October2023 (pan-europe.info)