



PAN Europe

Pesticides Action Network Europe

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To: Commissioner XX

Subject: Call to reject eight unacceptable pesticides in the framework of the review under Council Directive 91/414/EEC.

Dear Commissioner:

We are writing to you ahead of the Commission's discussion of eight Directive proposals to authorise pesticides active substances¹. Members States' representatives have rightly rejected the Commission's initial proposal in the relevant regulatory committee². Even considering the restrictions on crops and doses, these substances pose real threats to farmers, consumers and the environment. A detailed overview of the hazards and risks regarding each of the eight substances which were highlighted by the Commission itself, and several EU and international agencies' classifications are provided in the Annex.

We therefore urge you to abandon these proposals for authorisation and support the total ban of these eight substances, if necessary by means of a two-year phase-out period.

This is a unique opportunity to respond to the leading food-related health concern among citizens, pesticide residues, as highlighted in the most recent Eurobarometer survey conducted in Autumn 2005 and commissioned by the European Food Safety Authority. Also, according to the objectives of Directive 91/414/EEC, "health, groundwater and the environment and human and animal health should take priority over the objective of improving plant production". In-field monitoring of any risk mitigation measures, including those envisaged, is either very difficult or even unfeasible and places an impossible burden on Member States.

¹ Azinphos-methyl, Carbendazim, Dinocap, Fenarimol, Flusilazole, Methamidophos, Procymidone and Vinclozolin

² Standing Committee on the Food Chain and Animal Health (SCFCAH) on the 3rd March 2006. Despite the opinion of the scientific committee which had recommended withdrawal from the market, the Commission still proposed a restricted authorisation.

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PAN Europe believes these proposals will threaten both the health of European citizens and their environment. Their safety should be put ahead of any market concerns. These proposals also indicate the need for a fundamental revision of the Directive governing pesticide marketing in the EU, which should deliver clear-cut criteria for phase-out and provisions for substitution of the most hazardous substances with safer chemical and non-chemical alternatives.

As these examples show, the Directive 91/414/EEC, currently under revision, opens the way to approving extremely hazardous substances. We hope we can work together in the coming months, once the proposal for the revision of the Directive and Thematic Strategy on Pesticides is adopted by the Commission and debated by the European Parliament and Council.

Yours sincerely:



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ANNEX

RISKS AND HAZARDS HIGHLIGHTED BY THE EUROPEAN COMMISSION AND HAZARDS CLASSIFICATION

	Risks highlighted by the Commission in August 2005	Hazards classification according to EU and several international agencies
Azinphos-methyl	Risks to consumers Risks to operators Risks to birds, mammals, aquatic organisms and non-target arthropods	Acute toxic (1) Neurotoxic (Cholinesterase inhibitor) (2) Potential groundwater contaminant (3)
Carbendazim	Mutagenic Toxic to reproduction High risk to earthworms	Mutagenic (4) Possible carcinogen (5) Endocrine disruptor (6)
Dinocap	Toxic to reproduction Risk to operators	Moderate toxic (1) Reprotoxic (2)
Fenarimol	Endocrine disrupting potential High risk to breast-fed babies	Reprotoxic (2) Suspected endocrine disruptor (6) Potential groundwater contaminant (3)
Flusilazole	Endocrine disrupting potential Toxic to reproduction Risks to birds, mammals and aquatic organisms	
Methamidophos	Risks to operators Risks to consumers Risks to birds, mammals and aquatic organisms	Acute toxic (1) Neurotoxic (Cholinesterase inhibitor) (2) Potential groundwater contaminant (3) Carcinogen (5)
Procymidone	Endocrine disrupting potential Dietary exposure to residues Risk to birds, mammals and aquatic organisms	Carcinogen (5) Suspected endocrine disruptor (6)
Vinclozolin	Endocrine disrupting potential Risk to birds, mammals and aquatic organisms	Carcinogen (5) Suspected endocrine disruptor (6) Potential groundwater contaminant (3) Reprotoxic (2)

- (1) World Health Organization (WHO) Acute Hazard Rankings <http://www.who.int>
(2) Neurotoxicity (inhibition of Cholinesterase), California Department of Pesticide Regulation & PAN North America database <http://www.pesticideinfo.org>
(3) Groundwater contamination California Department of Pesticide Regulation & PAN North America database <http://www.pesticideinfo.org>
(4) Carcinogenicity, Mutagenicity, Reprotoxicity, European Classification <http://www.ecb.jrc.it>
(5) Carcinogenicity, International Agency for Research on Cancer Classification <http://www.iarc.fr> and American Classification – US EPA <http://www.epa.gov>
(6) Endocrine disruption, European Classification http://europa.eu.int/comm/environment/endocrine/index_en.htm

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The degree of hazard and risks posed by these substances is far from acceptable. This can be illustrated with the two following examples:-

- Despite being an organophosphorus insecticide with acute toxic, neurotoxic and carcinogenic properties and being banned and/or restricted in several countries worldwide due to its hazards, **methamidophos** residues are commonly found in fruit and vegetables in the EU (4,4% of all table grapes and 2.5% of all cucumber samples). At the residue levels found across Europe, the acute risk analysis concluded that a toddler would consume 164% of the conventional acceptable daily intake of methamidophos in sweet peppers.
- **Vinclozolin** is a fungicide used in vines, fruit and vegetables but it is also a carcinogen, endocrine disruptor, threat to fertility and potential groundwater contaminant. Lately, numerous concerns have been raised worldwide and it is banned in a various countries including Denmark, Finland and Norway. In the USA, it is being phased out due to concerns over its reprotoxic and endocrine- disrupting properties and its cumulative effects with procymidone. These two fungicides are used in combination in a number of crops and their residues are consistently found in EU fruit and vegetables (procymidone is found in 22.4% of all table grapes and 17.9% of all sweet peppers samples; vinclozolin is found in 12% of all pea samples).

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