



PAN Europe

Pesticides Action Network Europe

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To: Ministers of Agriculture, the Environment and Health

CC: Permanent Representations of EU Member States to the European Union

Subject: Call to reject EU authorisation of 6 unacceptable pesticides

Dear Minister,

We are writing to you regarding the Commission's revised proposals to authorise six hazardous pesticides. The Commission finally recognised the need for tougher controls, but unfortunately only made a rather cosmetic change - reducing the authorisation periods. This is insufficient and would send a wrong signal to the market and instead of investments in safer alternatives it would encourage industry to invest in winning further extensions.

We therefore urge you to reject the Commission's proposals and instead request a ban of the six substances, if necessary by means of a phase-out period to give farmers time to adapt their pest control methods.

Under the reviewed proposals, four¹ of the six hazardous pesticides are conditionally authorised for a period of 18 months and the remaining two² are conditionally authorised for a period of three years, instead of them all being authorised for seven years, as initially proposed. But we consider that these substances, which pose a public health threat: all six pesticides being classified as carcinogenic, mutagenic or reprotoxic, or identified as endocrine disruptors should never appear on an EU positive list for pesticide ingredients.

The Commission itself has adopted such an approach in its proposed Regulation revising the pesticides authorisation Directive 91/414/EEC and should have been consistent with this and proposed a ban.

The majority of the countries in the Standing Committee on the Food Chain and Animal Health (SCFAH), Section GM Food & Feed, voted against approval of 8 hazardous pesticide active substances. Although Member States Ministers have already rejected the authorisation of two³ of the 8 substances in the Agriculture Council of last Monday 18 September, we strongly believe that the remaining 6

¹ Fenarimol, Flusilazole, Methamidophos, Procymidone

² Dinocap and Carbendazim

³ Azinphos-methyl, Vinclozolin.

pesticides should also be excluded from the EU market. These chemicals pose real threats to farmers, consumers and the environment, even if restrictions on crops and doses are applied. In addition, in-field monitoring of any risk mitigation measures, including those envisaged in the proposals, is either very difficult or even unfeasible and places an impossible burden on Member States.

A detailed overview of the hazards and risks, highlighted by the Commission itself, is provided in the Annex, alongside several EU and international agencies' classifications.

If adopted, the Commission's proposals would unnecessarily threaten both the health of European citizens and their environment. Safety must be given a higher priority than any market concerns.

Finally, we would like to draw your attention to the international implications of the final decision on the approval of these substances. EU decisions on pesticides are taken as a strong indication of which substances are "safe" for use worldwide, particularly in developing countries, where risk management measures and techniques are far from being common practice.

We therefore urge you to take this opportunity to reject the Commission's new proposals and ask for a ban of the six substances.

Yours sincerely,



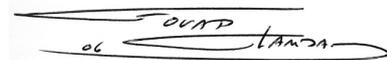
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ANNEX

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
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)

- (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