PAN Europe

Pesticides Action Network Europe

Development House
56-64 Leonard Street
London EC2A 4JX
United Kingdom
Tel +44 (0) 207 065 0920
Fax +44 (0) 207 065 0907
Email : sofia-paneurope@pan-uk.org
Website: *www.pan-europe.info*

May 2005

To: Minister/Representative in the EU Standing Committee on the Food Chain and Animal Health

Subject: Danger of inclusion of chlorpyrifos in Annex I to Council Directive 91/414/EEC.

Dear Minister/Representative:

We write you in order to call attention upon a potential threat to European citizens' health and safety resulting from the proposal of the European Commission to include chlorpyrifos in Annex I to Council Directive 91/414/EEC. The draft Commission Directive is going to be presented in the next meeting of the Standing Committee on the Food Chain and Animal Safety (Pharmaceutical Section), 2 and 3 of June, despite strong evidences of potential harmful effects to the environment and human health, especially to children and the unborn.

The health effects for humans include neurological effects stemming from the inhibition of cholinesterase, an enzyme necessary for the proper transmission of nerve impulses. Symptoms include excessive salivation and tearing, uncontrolled urination, weakness, nausea, vomiting, diarrhoea, headaches, pinpoint pupils, confusion and dizziness. At higher doses, tremors, convulsions or respiratory paralysis may occur, sometimes leading to coma and death.
Chlorpyrifos is a suspected endocrine disruptor and is listed as such in official publications[1].
A recent epidemiological study[2] has revealed significant negative influence on intra-uterine growth of the pesticide chlorpyrifos in humans. The levels were measured in the babies umbilical cord blood. Intra-uterine growth retardation is known as fetal origin of adult diseases like hypertension, type II diabetes, atherosclerosis and cardiovascular diseases.
Chlorpyrifos adversely affects biodiversity by destroying non-target organisms. Important problems include: the destruction of beneficial insects; high toxicity for freshwater fish, estuarine and marine organisms; acute toxicity for birds, among others.

---

[1] IEH (2005), *Chemicals Purported to be Endocrine Disruptors: a Compilation of Published Lists* (Web Report W20), Leicester, UK, MRC Institute for Environment and Health, available at http://www.le.ac.uk/ieh

[2] Frederica P. Perera, Virginia Rauh, Wei-Yann Tsai, Patrick Kinney, David Camann, Dana Barr, Tom Bernert, Robin Garfinkel, Yi-Hsuan Tu, Diurka Diaz, Jessica Dietrich, and Robin M. Whyatt (2003), *Effects of Transplacental Exposure to Environmental Pollutants on Birth Outcomes in a Multiethnic Population*, Environmental Health Perspectives 111:205.

In 2000 the US Environmental Protection Agency announced a ban from home and garden uses after federally mandated risk assessments concluded that children are more sensitive to the pesticide than previously estimated. In addition, infants and children may be more heavily exposed to chlorpyrifos in the home and in the food than are adults. This ban has already resulted in a significant reduction in its impact on newborns' birth weight and length, according to a recent study funded by the National Institute of Environmental Health Sciences of the National Institutes of Health, the U.S. Environmental Protection Agency, and other private foundations.

The dangerousness of this substance and the lack of data regarding its effects was documented on several stakeholders' forums and EU bodies where several recommendations were drawn in order to phase out its use and carry on further research regarding its effects on humans, especially on children and pregnant women, namely:

- The *European Parliament Resolution A6-0008/2005 on the European Environment & Health Action Plan 2004-2010* urges restricting the marketing and/or the use of chlorpyrifos based on the risks posed to new-born babies, children, pregnant women, elderly persons and workers;
- The *Decision No 2455/2001/EC of the EP and the Council* establishes a list of priority substances in the field of water policy and identifies chlorpyrifos as a priority hazardous substance;
- The final recommendations in the reports of the Technical Working Group on priority diseases in the framework of the European Environment and Health *Strategy COM (2003) 338 final* advises the revision of risk assessment for chlorpyrifos and limitations of its use with respect to children's health based on the risks for the neurodevelopmental toxicity for children;
- There is an increasing number of scientific studies showing the detrimental effect of chlorpyrifos on fetal neurodevelopment and the developmental neurotoxicity extenting to late phases of brain maturation including adolescence (see Fact Sheet attached).

In addition, it is against Directive 91/414/EEC to include a pesticide in the list of positive substances without the necessary data. Chlorpyrifos is not necessary for wine and cereal production as other less harmful alternatives exist. Denmark representatives, for example, will vote against the inclusion of this substance on the bases that there is no guarantee of safe use and lack of data for effects on birds and wild mammals. The root problem is in the missing provisions for the substitution principle in the current text of Directive 91/414/EEC resulting in the pesticide producer's right to marketing their products ranking higher in priorities than the protection of human health and wildlife. This gap in the current legislation should be rectified in the ongoing process of revision of the Directive 91/414/EEC.

Considering the serious health and environmental concerns and the contradiction with other EU legislation, resolutions and recommendations we strongly urge you to ensure that your representatives at the next meeting of the Standing Committee on the Food Chain and Animal Health (2 – 3 June 2005) will reject the inclusion of chlorpyrifos on the EU pesticides positive list.

Thanking you in anticipation and best wishes

Sofia Parente
PAN Europe Coordinator