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**CPE**

*Coordination Paysanne  
Européenne  
European Farmers Coordination*

November 13, 2006

To: Ministers of Agriculture, Environment and Health of the European Union  
Cc: Members of the Standing Committee Food Chain Animal Health

Dear Sir/Madam:

We would like to direct your attention to the evaluation of the herbicide, glufosinate-ammonium, currently being undertaken in the framework of Directive 91/414/EEC for the placing of pesticides on the EU market. The European Commission is currently preparing a proposal and the recommendation of the rapporteur Member State, Sweden, is for a ban on the substance in the European market.

**We ask you not to miss the opportunity to ban this dangerous substance in the European Union. Market or economic considerations should not be allowed to override the objective of protecting of human health and the environment, laid out in Directive 91/414/EEC and the wider health and consumer protection and environmental policies of the European Union.**

Our call is supported by the results of the risk assessment for this substance, conducted by Sweden, the rapporteur Member State, and peer reviewed by EFSA-European Food Safety Authority. During the evaluation, serious concerns were raised about the risks of this substance for consumers, operators and the environment. The substance is classified as reprotoxic category II, with laboratory experiments causing premature birth, intra-uterine death and abortions in rats. According to the risk assessment conclusions, under the proposed uses in orchards,

with genetically modified crops (maize, rape-seed and sugar beet) and potatoes, glufosinate-amonium:

- poses grave dangers to consumers, in particular children as it exceeds the ARfD-Acute Reference Dose for toddlers in potatoes (0.045mg/kg of body weight). Only slightly higher levels of residues than the recommended for toddlers (8.5 mg/kg of body weight, less than a 200 higher level ) caused the death of dogs in laboratory experiments due to myocardial necrosis;
- exceeds the AOEL-Acute Operator Exposure Level, even if gloves and overalls are worn (which rarely happens in the real world conditions of use and which public authorities have no way of monitoring or enforcing in the field);
- poses high risk to mammals, non-target arthropods and non-target plants.

Independent research is not abundant, but an epidemiological study in Valencia, Spain, found a risk of congenital malformations as a consequence of exposure to some pesticides, notably glufosinate<sup>1</sup>.

The Commission's proposal for a new Regulation (to revise Directive 91/414/EEC) proposes a ban on all CRM (carcinogenic, mutagenic, reprotoxic) pesticides from categories I and II. As mentioned above, glufosinate-amonium is classified as falling in reprotoxic category II. To ensure coherence with the new pesticides approval policy this substance should be banned from the market straight away.

Furthermore, we would like to draw your attention to the fact that the final decision will have international implications. EU decisions regarding pesticides are taken as a strong indication of which substances are "safe" for use worldwide, especially in developing countries, where risk management measures and techniques are far from being common practice. A decision to ban this substance (and a notification under the Prior Information Consent of Rotterdam Convention) would have positive implications for developing countries using this substance where operators have less means to protect themselves against the hazards of pesticides and consumers have limited access to information about contamination of food by pesticides residues.

Best regards,

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<sup>1</sup> Garcia AM, Benavides FG, Fletcher T, Orts E (1998), Paternal exposure to pesticides and congenital malformations, Scandinavian Journal Environmental Health, 1998 Dec;24(6):473-80