



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

17 February 2006

To: Ministers of Agriculture, Environment and Consumers

Cc: Representative in the EU Standing Committee on the Food Chain and Animal Health

Subject: Rejection of authorisation of 8 unacceptable pesticides under Council Directive 91/414/EEC

Dear Minister,

We call upon you to reject a number of Commission proposals to include further substances¹ in Annex I of Directive 91/414/EEC during the next meeting of the Standing Committee on the Food Chain and Animal Health (SCFCAH), Section GM Food & Feed on 3 March. The proposals were scheduled to be discussed and voted in the meeting of the SCFCAH of 27-28 January, but they were withdrawn from the agenda without further explanation. We believe that the European Commission is wrongly proposing to authorise placing on the EU market a number of unacceptable pesticides, including several with mutagenic and hormone mimicking properties. The results from the evaluation conducted by Member States experts and scientific advisors do not justify these proposals.

The Commission's proposal to include these substances is particularly worrying since in August 2005, it had informed the registrants of the 8 substances that it was "*considering the possible non-inclusion of the substance*". Several months later, the Commission did a u-turn and decided to include these same substances despite member states experts' recommendations to keep them off the list. This disregard for the normal evaluation process results in favour of the industry and penalises heavily consumers and farmers.

We urge you to insist that the Commission withdraws these proposals. The Commission's current proposals to authorise these substances ignore the negative evaluation results, and only demonstrate how the current lack of transparency in the decision-making process can be misused. As the Commission mentions in its earlier

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

PAN Europe is facilitated by PAN Germany and PAN UK
PAN Europe is a UK Not-for-Profit Private Limited Company, No. 4750630

European Environmental Bureau (a/sbl) Boulevard de Waterloo 34, B-1000 Brussels, Belgium, Tel: +32 2 289 1090
Fax: +32 2 289 1099 Email: eeb@eeb.org Web: www.eeb.org www.participate.org www.chemicalreaction.org

EPHA Environment Network (EEN) | 39-41 rue d'Arlon, B1000 Brussels, Belgium
phone: +32 2 233 3875 | fax: +32 2 233 3880 | email info@env-health.org

letters, once the evaluation was concluded, it would not accept further studies nor modifications to the supported uses deviating from those already under evaluation.

The major obstacles for the authorisation of these substances according to the earlier letters from the Commission are for example:

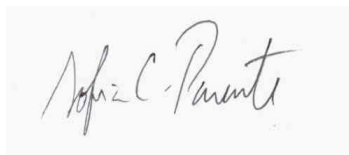
- **Methamidophos** poses **risks to operators and consumers**, as well as birds, mammals and aquatic organisms.
- **Procymidone** has **hormone mimicking potential**, and poses risks to birds, mammals and aquatic organisms, while there is “**dietary exposure from certain commodities**”.
- **Fenarimol** also has **hormone mimicking potential** and poses **high risks to breast-fed babies**.

More details about risks highlighted by the Commission and hazards regarding each of the 8 substances are provided in the Annex. You can also find a summary of scientific evidence on endocrine disrupting pesticides (as an attachment to this letter), with special focus on vinclozolin and procymidone.

Furthermore we would like to draw your attention that the final decision will have international implications, as 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 currently far from being common practice.

This is a unique opportunity to respond to citizen’s top food-related health concern, pesticide residues, as highlighted in the most recent Eurobarometer survey conducted in Autumn 2005 and commissioned by European Food Safety Authority. We therefore urge you to reject the inclusion of these substances in the EU positive pesticide list even if a limited authorisation is proposed, and to ask the European Commission to withdraw their proposal to include these substances in Annex I.

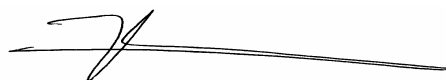
Yours sincerely,



Sofia Parente
PAN Europe
Administrator/Coordinator



Genon Jensen
Director EEN



John Hontelez
Secretary General, EEB

*PAN Europe is facilitated by PAN Germany and PAN UK
PAN Europe is a UK Not-for-Profit Private Limited Company, No. 4750630*

European Environmental Bureau (aisbl) Boulevard de Waterloo 34, B-1000 Brussels, Belgium, Tel: +32 2 289 1090
Fax: +32 2 289 1099 Email: eeb@eeb.org Web: www.eeb.org www.participate.org www.chemicalreaction.org

EPHA Environment Network (EEN) | 39-41 rue d'Arlon, B1000 Brussels, Belgium
phone: +32 2 233 3875 | fax: +32 2 233 3880 | email info@env-health.org

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

*PAN Europe is facilitated by PAN Germany and PAN UK
 PAN Europe is a UK Not-for-Profit Private Limited Company, No. 4750630*

European Environmental Bureau (aisbl) Boulevard de Waterloo 34, B-1000 Brussels, Belgium, Tel: +32 2 289 1090
 Fax: +32 2 289 1099 Email: eeb@eeb.org Web: www.eeb.org www.participate.org www.chemicalreaction.org

EPHA Environment Network (EEN) | 39-41 rue d'Arlon, B1000 Brussels, Belgium
 phone: +32 2 233 3875 | fax: +32 2 233 3880 | email info@env-health.org