17 February 2006

To: Ministers of Agriculture, Environment and Consumers

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


Dear Minister,

We call upon you to reject a number of Commission proposals to include further substances\(^1\) 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 The proposals were scheduled to be discussed and voted in the meeting of the SCFCAH of 27-28 January, but they were withdrawn from the agenda without further explanation.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

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\(^{1}\) Azinphos-methyl, Carbenazim, Dinocap, Fenarimol, Flusilazole, Methamidophos, Procymidone and Vinclozolin
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
## ANNEX

### RISKS AND HAZARDS HIGHLIGHTED BY THE EUROPEAN COMMISSION AND HAZARDS CLASSIFICATION

<table>
<thead>
<tr>
<th>Risk Factor</th>
<th>Risks highlighted by the Commission in August 2005</th>
<th>Hazards classification according to EU and several international agencies</th>
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</table>
| 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](http://www.who.int)
(2) Neurotoxicity (inhibition of Cholinesterase), California Department of Pesticide Regulation & PAN North America database [http://www.pesticideinfo.org](http://www.pesticideinfo.org)
(3) Groundwater contamination California Department of Pesticide Regulation & PAN North America database [http://www.pesticideinfo.org](http://www.pesticideinfo.org)
(4) Carcinogenicity, Mutagenicity, Reprotoxicity, European Classification [http://www.ecb.jrc.it](http://www.ecb.jrc.it)