January 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) on 26/27 January. 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 move is particularly worrying since the Commission itself has previously informed the various registrants of the respective substances in several letters in August 2005, that it is “considering the possible non-inclusion of the substance”. The sudden change in the Commission’s opinion is not understandable without further evaluation.

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 process can be misused. As the Commission mentions in its earlier letters, once the evaluation was concluded, it should not accept further studies nor modifications to the supported uses deviating from those which have been subject of the evaluation.

\(^1\) Azinphos-methyl, Carbendazim, Dinocap, Fenarimol, Flusilazole, Methamidophos, Procymidone and Vinclozolin
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 to the fact, 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.

We therefore urge you to reject the inclusion of these substances in the EU positive 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

John Hontelez  
Secretary General, EEB
ANNEX

RISKS AND HAZARDS HIGHLIGHTED BY THE EUROPEAN COMMISSION AND HAZARDS CLASSIFICATION

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<th>Risks highlighted by the Commission in August 2005</th>
<th>Hazards classification according to several EU and international agencies</th>
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| Azinphos-methyl | Risks to consumers | Acute toxic  
Risks to operators | Cholinesterase inhibitor  
Risks to birds, mammals, aquatic organisms and non-target arthropods | Potential groundwater contaminant |
| Carbendazim    | Mutagenic | Possible carcinogen  
Toxic to reproduction | Suspected endocrine disruptor  
High risk to earthworms |
| Dinocap        | Toxic to reproduction | Moderate toxic  
Risk to operators | Toxic to reproduction |
| Fenarimol      | Endocrine disrupting potential  
High risk to breast-fed babies | Suspected endocrine disruptor  
Risk to operators |
| Flusilazole    | Endocrine disrupting potential  
Risks to birds, mammals and aquatic organisms | Endocrine disrupting potential  
Risk to operators  
Toxic to reproduction |
| Methamidophos  | Risks to operators  
Risks to consumers  
Risks to birds, mammals and aquatic organisms | Acute toxic  
Cholinesterase inhibitor  
Risk to operators  
Risks to birds, mammals and aquatic organisms |
| Procymidone    | Endocrine disrupting potential  
Dietary exposure to residues  
Risks to birds, mammals and aquatic organisms | Carcinogen  
Suspected endocrine disruptor  
Dietary exposure to residues |
| Vinclozolin    | Endocrine disrupting potential  
Risk to birds, mammals and aquatic organisms | Carcinogen  
Suspected endocrine disruptor  
Risk to birds, mammals and aquatic organisms |

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