

Subject: Paraquat poisoning incidents in Portugal.

Pesticide Action Network Europe (PAN-E) publicly presented figures of poisoning incidents caused by paraquat in Portugal that have been contested by Syngenta. I would like to clarify the source of this information and provide additional information that supports the case for a phase-out of paraquat and regulation at the international level within the Prior Information Consent and the Rotterdam Convention.

The source of information (attached) consists of a summary compiled by the Portuguese authorities and sent to the European Commission in 2004. This single piece of information offers two incontestable conclusions:

- There have been a number of poisoning cases, including occupational, accidental and intentional exposure;
- There is a high degree of uncertainty about the number of poisoning incidents because there is not one single source of information and not all cases are reported;

As for the numbers, you can see highlighted the several sources of information presented by the Portuguese authorities:

- The National Poison Centre (CIAV) reported 95 phone calls related to exposure to paraquat. These included 36 confirmed cases of intoxication and 35 cases of risk of intoxication and not just requests for information as Syngenta claims. In addition to these 95 phone calls related to human exposure, the Poison Centre received an additional 4 phone calls related to animal exposure and 31 requests for information;
- Hospital S. Bernardo Setubal (a public hospital in the south) and INML Coimbra (National Institute of Legal Medicine in the centre), reported 65 additional cases.

Despite the difficulty in obtaining the concrete number of incidents related to paraquat, the available information provides strong evidence of the extent of the problem. It is therefore undeniable that paraquat is linked to poisoning incidents in Portugal and in the EU and a battle for numbers should not lead decision-makers to forget what is really behind the numbers: paraquat is an extremely toxic substance and the control of such substances is impossible once they are placed in the market. In most European countries, including Portugal, individuals don't need a professional certificate to buy pesticides and therefore any individual can have access to highly toxic substances.

The numbers in Portugal are striking and I relate to them personally because I was born in a rural area in Portugal have seen neighbours dying from accidental exposure to paraquat as agriculture workers.

Because there are no national statistics on poisoning incidents in most European countries, the most reliable figures often come from forensic institutes. The Forensic Toxicology Laboratory of Coimbra, in the centre of Portugal, received 639 requests for pesticide analysis between January 2000 and December 2002. The herbicide paraquat was detected in 31 fatalities and the authors conclude that more stringent

legislation is needed for pesticides¹. Another article published by a small hospital in the northeast of Portugal acknowledges poisoning incidents with paraquat sadly "common". Between April 1997 and June 2004, the service recorded 31 cases of intoxication with paraquat resulting in 20 deaths².

A future Regulation for placing pesticides in the market should create provisions to phase-out paraquat and similar toxic substances. Besides the known acute toxic effects of paraquat, the substance is growingly associated with chronic health problems in the scientific literature. Independent scientific literature should also be taken into consideration in the decision whether to approve a substance for the EU market.

The situation in Portugal and the EU offers reasons for concern, but the situation in developing countries in incomparably worse. An extensive review of the impacts of paraquat, largely from peer-reviewed studies (attached), concludes that paraquat is widely used under high-risk conditions. Problems of poverty are exacerbated by exposure to hazardous chemicals, as users have no means to protect themselves³.

As long as it continues to be marketed, paraquat's trade should be regulated at the international level within the Prior Information Consent procedure. A number of countries have already banned paraquat or severely restricted its availability, and many companies have prohibited its use in crops they grow or purchase, showing that there are less hazardous alternatives to paraquat in the market already.

Sincerely yours:

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¹ Teixeira H, Proenca P, Alvarenga M, Oliveira M, Marques EP, Vieira DN (2004), Pesticide intoxications in the Centre of Portugal: three years analysis, Forensic Science International, Jul 16; 143(2-3):199-204.

² Castro R, Prata C, Oliveira L, Carvalho MJ, Santos J, Carvalho F, Morgado T (2005), Paraquat intoxication and hemocarboperfusion, Acta Medica Portuguesa;18 (6):423-31 16684482. http://www.actamedicaportuguesa.com/pdf/2005-18/6/423-432.pdf

³ Richard Isenring (2006), Paraquat – Unacceptable health risks for users, Edited by Robert Madeley, Berne Declaration, PAN UK and PAN Asia Pacific. http://www.evb.ch/cm_data/EvB_Paraquat_E.pdf