



Brussels, 16<sup>th</sup> May 2017

Dear Members of the Standing Committee on Plants Animals Food and Feed,

Ahead of the meeting of SCOPAFF on 17<sup>th</sup> and 18<sup>th</sup> of May 2017, section *Phytopharmaceuticals - Plant Protection Products – Legislation*, we would like to share with you our comments on following points of the agenda:

**Criteria for the determination of pesticides with endocrine disrupting properties:**

- We welcome the clarification (recital 4) that the criteria aim to identify both known and presumed endocrine disrupting substances.
- We are concerned that point 3.6.5. (3) has been kept in the criteria, which asks that the substance-induced adverse effect (assumably observed in experimental animals) is a consequence of a defined endocrine mode of action. Such a high level of proof is not required for any other hazardous substance. We understand that the aim of the PPPR 1107/2009, which is underpinned by the precautionary principle, is to protect people and the environment from the harmful effects of pesticides whether the mechanism of action is known or not. The investigation of the mode of action of different EDCs is a very complex task that belongs to the field of research and not to the industry-contracted laboratories that should follow clear and easy-to-use protocols. Finally, the OECD Conceptual Framework for endocrine disruptors and the Guidance Document No. 150 provide a list of test guidelines that are designed or have been modified to assess effects of endocrine disrupting chemicals that are relevant for humans and environmental ecosystems. Why is the mode of action requested when the experiment has been designed to detect adverse effects caused by chemical exposure? We worry that this ‘mode of action’ element can be easily misused during the risk assessment of a substance, will result in endless debates and authorities will end up approving harmful EDCs due to data gaps on our understanding about their mechanism of action.
- The derogation for non-target organisms (3.8.2 last paragraph) seems to be incorrectly placed within the criteria to identify chemicals with endocrine disrupting properties. This is an exception and not an element to determine which chemicals are EDCs. Further, this exception was not in the PPPR 1107/2009 mandate of the European Commission and hence should go through the legislative procedure before it is included in any part of the regulation. Lastly, it is very disappointing to see that endocrine disruptors for non-vertebrates will be approved, even though 95% of the animal kingdom are invertebrates and they play a key role to maintain the balance of ecosystems and the population of species.



- Testing of all pesticides in line with GD 150 (OECD) for endocrine disrupting properties should start immediately
- Finally, before you move forward with any decisions we would like to bring your attention to the letter sent by the Endocrine Society to the European Commissioner raising concerns about the regulation of endocrine disruptors in Europe <https://t.co/Xklkh0KosN>

### **Neonicotinoids**

- Considering the November 2016 EFSA peer review of the confirmatory data provided for imidacloprid and clothianidin, considering the insufficient data provided for thiamethoxam, considering the publication, every month of at least one independent peer reviewed scientific publication showing harm of neonicotinoids at field-realistic dose (e.g. Baron et al. in May 2017 confirming reprotoxic effect; e.g. Tosi et al. in April 2017 confirming disorientation), PAN Europe urges the Standing Committee to take action to completely ban neonicotinoids from the European Union.

### **Bee Guidance Document**

- Major deficiencies of the former risk assessment scheme for pesticides have led to the authorisation of neonicotinoids and the dramatic consequences that have been documented on pollinators as well as on entire ecosystems. To date, the only alternative that has been proposed, based on the latest, at the time, scientific knowledge, is the EFSA 2013 Bee Guidance Document (GD). Lately, several publications point at fungicides as a cause of honey bee decline. Several studies have already pointed at fungicides chlorothalonil (Pettis et al. 2013) and boscalid (Simon-Delso et al. 2014) as being chronically toxic to bees. By constantly postponing the implementation of the GD, the Standing Committee impedes a proper protection of our pollinators by properly assessing all toxicological endpoints, including chronic and sublethal toxicity. Nearly 4 years after the publication of the bee guidance document, the situation is not tenable as the European Commission as well as EU Member States have the obligation to protect the environment. We thus urge you to take action and proceed to the implementation of the Bee Guidance Document in the coming months.

Thank you for taking these comments into consideration,

With kind regards,

Angeliki Lysimachou, PhD  
On behalf of PAN Europe



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**Pesticide Action Network (PAN)** was founded in 1982 and is a network of over 600 non-governmental organisations, institutions and individuals in over 60 countries worldwide working to minimise the negative effects and replace the use of harmful pesticides with ecologically sound alternatives. Its projects and campaigns are coordinated by five autonomous Regional Centres. PAN Europe is the regional centre in Europe. It was founded in 1987 and brings together consumer, public health, and environmental organisations, trades unions, women's groups and farmer associations from across Europe.

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