

Presentation  
**“A White paper:  
Ensuring a higher level of  
protection from pesticides in  
Europe”**

Citizens for Science in Pesticide Regulation

June 11<sup>th</sup> 2019 – EFSA premises, Parma

## Citizens for Science in Pesticide Regulation A EUROPEAN COALITION

*Rigorous science, safe food and a healthy environment*

CITIZENS FOR SCIENCE IN PESTICIDE REGULATION - A EUROPEAN COALITION

### RIGOROUS SCIENCE, SAFE FOOD, AND A HEALTHY ENVIRONMENT

#### A MANIFESTO

The European Union has one of the best regulations for pesticides in the world – in theory. But it is not implemented in practice. A new coalition, "Citizens for Science in Pesticide Regulation", has launched this manifesto to call for reform.

This action comes at a crucial time, when the European Commission is reviewing the pesticides legislation as part of its REFIT programme. In addition, the European Parliament's PEST committee, convened by concerned MEPs in the wake of the glyphosate reapproval controversy, will deliver its recommendations for reform of the pesticides authorisation process at the end of 2018.

#### THE PROBLEM

The EU pesticides regulation explicitly prioritises the protection of human and animal health and the environment. It is underpinned by the precautionary principle to ensure that pesticide substances or products placed on the market do not adversely affect human or animal health or the environment. However, the rules are not implemented properly and the regulatory system allows private interests to take priority over health and the environment.

Major conflicts of interest persist in the pesticides regulatory system. For example, industry does its own safety testing and is heavily involved in designing the methods for risk assessment. The European Food Safety Authority (EFSA) pesticides panel, responsible for the designing of risk assessment guidelines, continues to include people with financial ties to the agrochemical industry. The EFSA expert groups, which conduct the peer review of the application dossier and publish an opinion on whether it meets the criteria for approval of the pesticide, consist of anonymous national civil servants, whose conflict of interest is unknown. The Monsanto Papers, internal Monsanto documents disclosed in cancer litigation in the USA, show how industry can actively subvert science. It is now clear that industry must be kept at arm's length from safety testing, risk assessment and risk management.

The result of the failure to properly implement the regulation is a rapid collapse of biodiversity (birds, bees, butterflies, frogs, and insects) in agricultural areas and serious harm to humans (including damage to the brain of the unborn foetus and a steady rise in hormone-related cancers such as breast and prostate). In addition to its failure to protect health and the

A WHITE PAPER

## ENSURING A HIGHER LEVEL OF PROTECTION FROM PESTICIDES IN EUROPE

THE PROBLEMS WITH CURRENT PESTICIDE RISK ASSESSMENT  
PROCEDURES IN THE EU – AND PROPOSED SOLUTIONS

Prepared for 'Citizens for Science in Pesticide Regulation'  
A European Coalition – 2018

# A White Paper – Problems & Solutions

A WHITE PAPER

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STRUCTURAL

METHODOLOGICAL

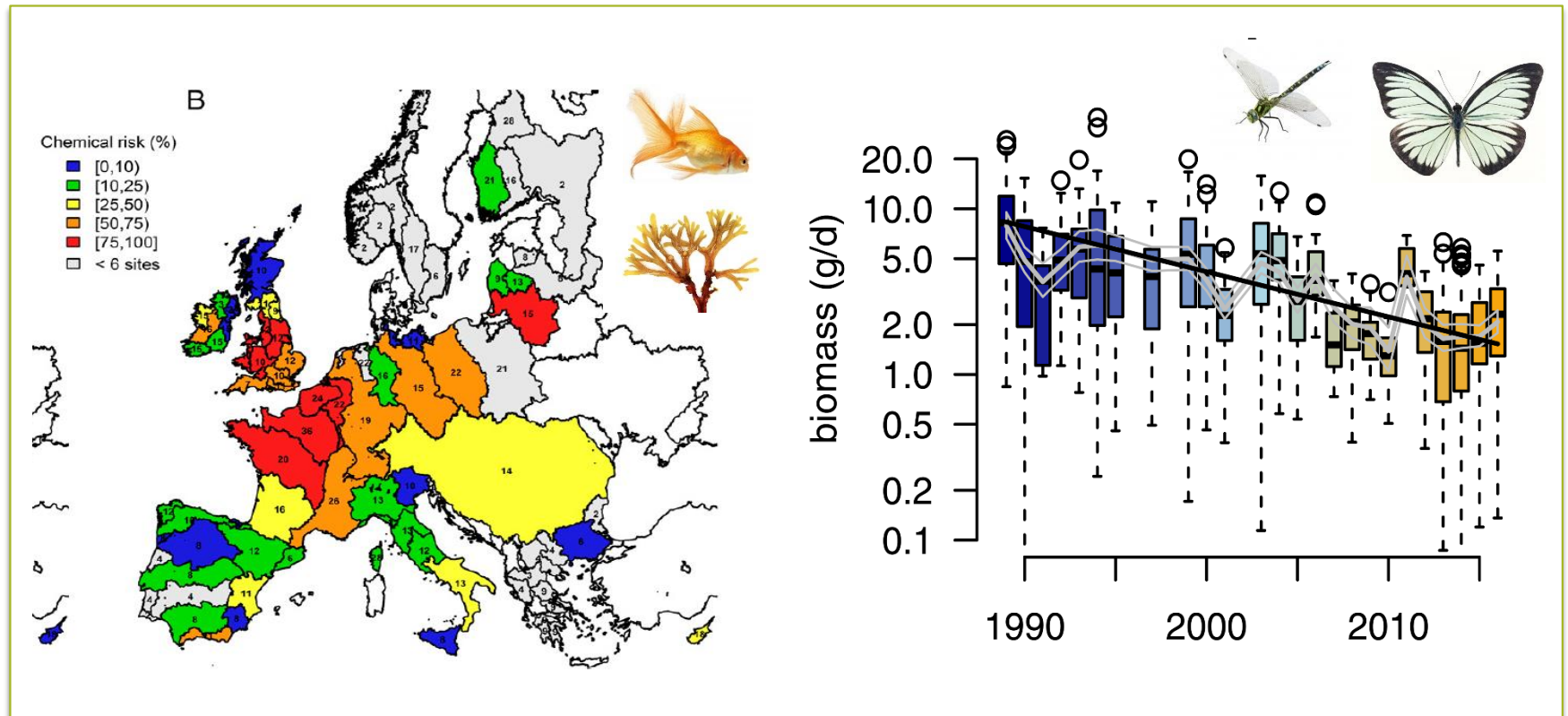
# Addressing toxicity of mixtures

- Pesticide formulations – dismissed from the assessment
- co-formulants & adjuvants are considered secondary and/or proprietary secrets
- pesticides A.S. are rarely used alone in real-life
- pesticides are not the only chemicals we're exposed to

Proposed solutions: Tiered approach  
Intermediate solution: add an extra safety factor of 10

Lack of meaningful post-authorisation monitoring

# Environmental impact is underestimated



**EU aquatic ecosystems:**

Risk 42% sites

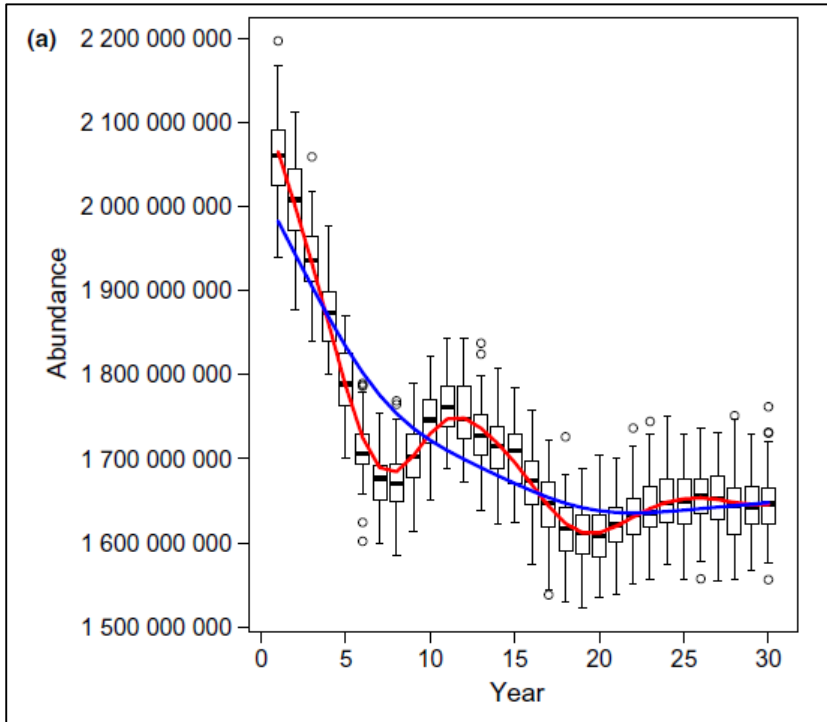
Malaj et al. (2014)

**Forests (Germany):**

76% insect biomass

Hallmann et al. (2017)

# Pesticide impact – environment and ecosystems



EU (1980-2009):

loss of 421 million birds

France (agricultural zones):

33% population decline in 17 years

## ERA - Underestimation of harm? Insecticides



### Insecticides

Regulatory Acceptable  
Concentration (RAC) sw/sed

**Vs**

Measured Insecticide  
Concentrations (MICs) n=23

44.7% MICs>RACs

55% of sites (n=1566)

- Limited monitoring data
- > Environmental Quality Standards (WFD)
- 90% with mixtures

**Insecticide are the main drivers of biodiversity loss**

Stehle S, Schulz R (2015). Pesticide Authorization in the EU – environment unprotected? *Environ Sci Pollut Res* **22**: 19632-19647



# Lack of meaningful post-authorisation monitoring

## Lack of:

- Volume and type of pesticides, location, restrictions applied
- environmental levels of pesticides, exposure levels of farm animals, farmers exposures as well as bystanders/residents.

## Proposed solutions:

- Impose mitigation measures and monitor their effectiveness in real-time - *Routine inspections* of farmers pesticide use
- Monitor real impact and adjust methodologies (modify PECs) and authorisation restrictions
- Data on pesticide use/type/volumes publicly available
- Online complaint platform for Citizens

# Transparency and independence

## Sources of “bias”:

- Industry is carrying out its own safety tests
  - Lack of transparency in industry studies
  - “Cherry picking”
- Guidance documents written by scientists, some of them with Col:
  - Terrestrial ecotoxicology
  - Human relevance
  - Groundwater & relevant metabolites
- Public funding provided to industry