List of guidance documents that need to be revised as soon as possible as they fail to fulfil the provisions of Regulation (EC) 1107/2009.

Note: Revision should be done by Scientists with no conflict of interest (independent from pesticide industry) that have expertise in the relevant fields (impact of contaminants to human health and/or environment/ecological status)

1) **Guidance Document on Terrestrial Ecotoxicology**

Because lethal and sublethal effects of up to 50 % of the studied insect population are considered acceptable, as well as "recovery" options that allow to wipe out entire classes of organisms and expect – without monitoring- that they will recover. This old guideline that was developed in close cooperation with industry (who has a strong conflict of interest to undermine impact of pesticides upon insects), might very well be one of the major causes of the insect decline and ecosystem collapse we observe today.

2) **Guidance Document on the assessment of the relevance of metabolites in groundwater**

The limit of pesticides in groundwater is 0.1 µg/L. The regulatory innovation to classify any metabolite as "relevant" or "irrelevant" should be reconsidered and evaluated, taking into account the precautionary principle. The data requirements classifying irrelevant metabolites are questionable and not in agreement with latest science (brain development, endocrine disruption, immunotoxicity, etc.). The scheme to allow pollution of groundwater with 'relevant' metabolites has no scientific basis and should be reconsidered with the newest science available.

3) **Guidance Document on Persistence in Soil**

Because it fails to predict real concentrations of pesticides in soil[1], and because soil degradation impacts soil health and fertility.

4) **FOCUS (1997 and 2001) Surface Water Models and scenarios**

Because they do not predict worst case scenario environmental concentrations, since water concentrations are often above the predicted values using these FOCUS models[2].

5) **Guidance on toxicity of pesticides on amphibians**

Because despite the load of scientific evidence on toxicity of pesticides to amphibians the guidance document is still missing and since the amphibian population is declining, the development of such a guidance is urgent.

[1] See Communication by Wageningen University reporting that 80% of European soils contain pesticides: https://www.wur.nl/en/newsarticle/Pesticide-residues-present-in-more-than-80-of-European-agricultural-soils.htm

[2] Stehle and Schulz, 2015. Pesticide authorization in the EU-environment unprotected? Environ Sci Pollut Res Int. 22(24):19632-47. doi: 10.1007/s11356-015-5148-5 *Also see* PAN Europe presentation