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Will there be no more pesticides?

Facts and fiction about pesticides figures

At the end of September the 2nd reading of the EU regulation on the placing on the market of pesticides started in the European Parliament. There has been a lot of discussion over studies and claims by the pesticides industry and from representatives of farmers that these new rules would lead up to 85% of all pesticides being withdrawn from the market and therefore resulting in resistance, more expensive food and food imports with dubious quality. These figures are based on false, overblown calculations. They create panic, hindering an objective discussion about the necessary improvements found within the new law for human health and the environment.

Many press releases and letters take as basis a study by the **UK Pesticide Safety Directorate PSD (1)**. This study analyses how 286 active substances would be affected by the foreseen cut-off criteria, both from the European Commission and the European Parliament. PSD claims that a ban of cancerogenic, mutagenic or reprotoxic substances plus endocrine disruptors would lead to 5-15% less available substances, taking EP's cut-off criteria from 1st reading would lead to 35-40% less substances, and because of the substitution mechanism foreseen by the European Parliament, up to 85% of substances could disappear from the market.

The EU Commission criticised PSD's calculation. The Commission underlines that the cut-off criteria will not have a great impact on crop yield and food quality, and call the PSD study an **unrealistic overestimation**.

According to the European Commission only 22 out of 500 active substances will be affected by the cut-off criteria (less than 2% from CMR category 1,2; less than 4% from endocrine disruptors).

The European Commission's criticism

- **Arbitrary number of substances:** the PSD study takes for its calculation an arbitrary number of substances, which neither represents the number of active substances currently available, nor the number of substances which will be available after the current revision. They only look at 286 substances instead of all 500 which are currently available or under revision. This leads to an inevitable overestimation of the cut-off criteria's impact.
- **Imprecise classification:** PSD counts as endocrine disruptors (EDs) substances for which the final classification has not yet been decided. One cannot, for example,

1 See: [www.pesticides.gov.uk/uploadedfiles/Web_Assets/PSD/Impact_report_final_\(May%202008\)\(1\).pdf](http://www.pesticides.gov.uk/uploadedfiles/Web_Assets/PSD/Impact_report_final_(May%202008)(1).pdf)

classify entire classes of "triazoles" and "dithiocarbamates" as EDs which would consequently be taken off the market.

- **Derogation clause:** because of the foreseen derogation clause for highly hazardous pesticides which was introduced by the Council of Agricultural Ministers active substances could continue to be available. PSD did not take this into account.
- **Timeline:** for currently authorised substances the new rules do not apply yet. They will only apply when the authorisation up for renewal, which in most cases will not be until 2016.

Cut-off criteria does not equal substitution

Additionally to the reasons brought forward by the European Commission, the PSD study is to be rejected because of an additional methodological flaw.

It is highly unscientific and politically irresponsible to equal substances which fall under cut-off criteria with those that are on a list of candidates for substitution, like the PSD study does. For each substance which will have to be substituted, a new one will be on the market, otherwise the substance will not have to be replaced. Moreover, there is no automatic substitution. A substance will not have to be replaced simply because it is on the list of candidates for substitution.

The EU Commission has set three strict, clear criteria for when an active substance has to be substituted:

1. the existing alternative must be significantly safer for human or animal health or the environment
2. the alternative does not present significant economic or practical disadvantages
3. it must not lead to a resistance problem

In its Common Position, Council has added a fourth criteria:

4. consequences on minor use applications (meaning for fruits and vegetables) must be taken into account

When these four criteria are fulfilled, an active substance will be authorised for a certain number of years. The European Parliaments wants 2 years, Council wants 5.

Thus, farmers "tools" will not from one day to the next disappear from the market, the only thing that will happen is that individual "tools" will be replaced where safer alternatives exist.

POPs definition aligned with international standards

The European Crop Protection Association ECPA presented its assessment of the impact of the cut-off criteria in November 2007. For the same substances, their figures are constantly higher than the figures of the European Commission.

ECPA keeps warning that because of EP criteria, 80% of all insecticides and 70% of all fungicides would disappear from the market:

- For CRM category 1,2 ECPA calculates 3-7% less substances, the European Commission 2%

- For neurotoxic substances ECPA calculates minus 15-20%; according to a study commissioned by the EP's Environment Committee (2) only 3 substances would be affected; according to PSD no substance would fall under this criterium.
- For immunotoxic substances ECPA calculates that less than 1% would be affected
- The biggest block in ECPA's calculation are those substances which would fall under the POPs classification. ECPA estimates that 55-70% would fall under this criteria if the additional cut-off criteria from EP's 1st reading were adopted.

But this will not be the case. For 2nd reading, the rapporteur has aligned the POPs criteria to international standards. In its estimation of 2007, ECPA already stated that with this definition less than 1% would be affected, but they continue to use the high figure of 70 - 80%. ECPA has to adjust their figures to a reality.

ECPA also estimates that 20% of substances would disappear from the market because of their endocrine disrupting properties. But since there is no agreed definition for endocrine disruptors, one wonders how ECPA can come to this conclusion.

ECPA has recently issued yet another study (3) from the **European Centre for Agricultural, Regional and Environmental Policy Research**, stating that crop prices are set to increase by 70% because of the new EU rules. With a conservative estimate wheat and potato prices will increase by at least one fifth. The EU will turn into a net importeur of important food and consumers have to bear these costs. The study warns that there will be a drastic reduction of farmers' options because of the new rules.

These results are based on calculations (co-efficients) for crop losses which have no scientific grounding. And yet again, the mistake of the PSD study is repeated: candidates for substitution are again equalled with those disappearing because of a cut-off criteria. This leads to a triple of the effect of cut-off criteria as proposed by the European Commission. This is methodologically absolutely unsound and leads to only one thing: panic.

Conclusions

Industry time and again has called on objective debates about the new pesticides rules and advocated that the new law should be based on scientific studies. Yet, they cannot adhere to their own call to be scientific, and they claim to be scientific when they are in fact working on targeted disinformation. Their studies are unscientific with inflated figures. One wonders how this will lead to a more objective debate.

2 See: <http://www.europarl.europa.eu/activities/committees/studies/download.do?file=22471>

3 See: <http://www.ecpa.be/website/page.asp?mi=1&cust=3&lang=en&news=17994>

These figures should be considered in the debate

A study commissioned by the EP's Environment Committee from September 2008 comes to the conclusion that the cut-off criteria for the protection of human health as proposed by the European Commission and the European Parliament are justified.

The study took as basis the cut-off criteria CMR 1,2, endocrine disruptors, immuno- and neurotoxic substances. They analyzed numerous studies showing the link between hazardous pesticides and cancer, autism, damage to reproduction and further harm to health.

- **Poisonings:** according to the World Health Organisation each year 300.000 people die because of pesticides poisoning. Conservatively estimated for Europe, there are each year around 10 million € costs for hospitalisation because of pesticide poisoning and costs of 2.5 million € for lost work.
- **Cancer:** there are 3 million new cancer cases in the European Union and 1,7 million cancer-related deaths each year. If less than 1% of these deaths were caused by pesticides, 26 billion € could be saved per year. According to a PSD study, in Great Britain alone a cut-off for 7 pesticides could lead to savings of up to £ 709 million in 30 years. Extrapolating this to the EU, it would mean savings from 3,568 to 7,160 billion € for 30 years, only for farmers and their families who are exposed to pesticides.
- **Autism:** autism and other cognitive disorders cause high costs to society. According to a US study it costs 3.2 million US-\$ to care for one autistic person for a lifetime. US costs for caring for all autistic persons per year are 35 billion \$. In Great Britain it is estimated that the costs for caring for autistic children are 2.7 billion £ per year, for grown ups 25 billion £, which means there are costs of 28 billion £ per year in Great Britain alone. In Sweden the costs are calculated as 50,000 € per autistic child per year.
- **Nervous system and the brain:** Lead is a neurotoxic chemical which damages the brain and the nervous system of children. According to a US study cost due to lead poisoning is 43.3 billion \$ per year. High concentrations of lead cause a decrease in children's IQ. The resulting lower productivity is estimated to be 8.7 billion \$ per year.

It will be the farmers and their families who will benefit first and foremost from the new regulation, since they bear a higher health risk, because of their long-term exposure to pesticides. They are responsible for food production and carry the disproportionate risk and the costs. This should be taken into account when discussing seemingly high food prices.