Finnish Ministry of Agriculture
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Juha Korkeaoja

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Brussels, 19 July 2006

To: Ministers of Agriculture and the Environment

CC: Environment and Health Attachés of Permanent Representations of EU Member States to the European Union

Subject: Call to reject 8 unacceptable pesticides in the framework of the review of Council Directive 91/414/EEC

Dear Mr. Juha Korkeaoja:

Following our earlier letters, we are writing to you again on this subject as the Commission decided to ignore the concerns of the majority of Member States and proposed last month to the Council to authorise the marketing of eight pesticide active substances[1].

We call on you to reconfirm the negative opinion of the Member States Committee from 3rd March and reject these proposals. Instead the Council should request the Commission to propose a total ban of the eight substances, if necessary by means of a two-year phase-out period, which would give farmers the time to shift their pest control methods.

The majority of the countries in the Standing Committee on the Food Chain and Animal Health (SCFCAH), Section GM Food & Feed voted against inclusion of these substances in the EU market, because they pose real threats to farmers, consumers and the environment, even if restrictions on crops and doses are taken into consideration. A detailed overview of the hazards and risks, highlighted by the Commission itself, are provided in the Annex, alongside several EU and international agencies' classifications.

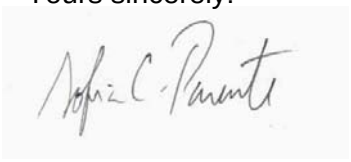
[1] Azinphos-methyl, Carbendazim, Dinocap, Fenarimol, Flusilazole, Methamidophos, Procymidone and Vinclozolin

This is a unique opportunity to respond to the top food-related health concern among citizens, pesticide residues, as highlighted in the most recent Eurobarometer survey conducted in autumn 2005 and commissioned by the European Food Safety Authority. Finally, in-field monitoring of any risk mitigation measures, including those envisaged, is either very difficult or even unfeasible and places an impossible burden on Member States.

If adopted the Commission's proposals would threaten both the health of European citizens and their environment unnecessarily; safety must be put ahead of any market concerns. These proposals also indicate the need for clear-cut criteria for phase-out and provisions for substitution of the most hazardous substances with safer chemical and non-chemical alternatives, in the framework of in the new Commission's proposal for a regulation revising the pesticides authorisation Directive 91/414/EEC.

We therefore urge you to reject the Commission's proposals before the September deadline and ask the Commission to propose the ban of these substances.

Yours sincerely:



Sofia Parente
Coordinator
Pesticides Action Network Europe

and on behalf of:

Danish Ecological Council
European Environmental Bureau
EPHA Environment Network
Friends of the Earth Europe
Mouvement pour le Droit et le Respect des Générations Futures
Pesticides Action Network Germany
Pesticides Action Network UK
Society for a Sustainable Leaving (SSL)
Women in Europe for a Common Future

ANNEX

RISKS AND HAZARDS HIGHLIGHTED BY THE EUROPEAN COMMISSION AND HAZARDS CLASSIFICATION

	Risks highlighted by the Commission in August 2005	**Hazards classification according to EU and several international agencies**
Azinphos-methyl	Risks to consumers Risks to operators Risks to birds, mammals, aquatic organisms and non-target arthropods	Acute toxic (1) Neurotoxic (Cholinesterase inhibitor) (2) Potential groundwater contaminant (3)
Carbendazim	Mutagenic Toxic to reproduction High risk to earthworms	Mutagenic (4) Possible carcinogen (5) Endocrine disruptor (6)
Dinocap	Toxic to reproduction Risk to operators	Moderate toxic (1) Reprotoxic (2)
Fenarimol	Endocrine disrupting potential High risk to breast-fed babies	Reprotoxic (2) Suspected endocrine disruptor (6) Potential groundwater contaminant (3)
Flusilazole	Endocrine disrupting potential Toxic to reproduction Risks to birds, mammals and aquatic organisms	
Methamidophos	Risks to operators Risks to consumers Risks to birds, mammals and aquatic organisms	Acute toxic (1) Neurotoxic (Cholinesterase inhibitor) (2) Potential groundwater contaminant (3) Carcinogen (5)
Procymidone	Endocrine disrupting potential Dietary exposure to residues Risk to birds, mammals and aquatic organisms	Carcinogen (5) Suspected endocrine disruptor (6)
Vinclozolin	Endocrine disrupting potential Risk to birds, mammals and aquatic organisms	Carcinogen (5) Suspected endocrine disruptor (6) Potential groundwater contaminant (3) Reprotoxic (2) Endocrine disrupting antiandrogen that alter nervous system development in addition to the reproductive system (7)

(1) World Health Organization (WHO) Acute Hazard Rankings http://www.who.int
(2) Neurotoxicity (inhibition of Cholinesterase), California Department of Pesticide Regulation & PAN North America database http://www.pesticideinfo.org
(3) Groundwater contamination California Department of Pesticide Regulation & PAN North America database http://www.pesticideinfo.org
(4) Carcinogenicity, Mutagenicity, Reprotoxicity, European Classification http://www.ecb.jrc.it
(5) Carcinogenicity, International Agency for Research on Cancer Classification http://www.iarc.fr and American Classification – US EPA http://www.epa.gov
(6) Endocrine disruption, European Classification http://europa.eu.int/comm/environment/endocrine/index_en.htm
(7) André, Susan M. and Markowski, Vincent P. (2006) *Learning deficits expressed as delayed extinction of a conditioned running response following perinatal exposure to vinclozolin*, Maine Center for Toxicology and Environmental Health, University of Southern Maine, Portland, Maine, 04104, United States.