



WECF Sankt-Jakobs-Platz 10 | D – 80331 München

Patricia Brunko  
European Commission  
DG Health and Consumer Protection  
B-1049 Brussels

28 April 2008

**Re: The need to eliminate the most hazardous pesticides from the EU food chain in order to protect our most vulnerable groups from reproductive and developmental harm.**

Dear Patricia Brunko,

I am writing to underline the importance of maintaining the Commission's present proposal to eliminate the most hazardous pesticides from the EU food chain.

The Commission's amended proposal for a Regulation on pesticides (11 March 2008) sets out specific measures to eliminate dietary exposure to the most hazardous pesticides present in EU food products. These chemicals, which according to the Commission's own estimates account for less than 5% of pesticides available to European farmers, include EU classified carcinogens, mutagens, reprotoxins and endocrine disruptors – pesticides for which there is no safe level of dietary exposure.

In light of the sustained and aggressive industry lobbying against the elimination of hazardous pesticides from the food chain, I would urgently draw your attention to the following:

- The Commission's proposals would eliminate a maximum of 23 pesticides from EU food products. These pesticides are all EU classified carcinogens, mutagens, reprotoxins or endocrine disruptors and represent less than 5% of the 507 pesticides approved for use in the European Community. The health impacts of these chemicals on the developing embryo, foetus and infants are irreversible and in some cases multi-generational. Many of these pesticides have already been withdrawn by a broad spectrum of European Member States.
- A substantial body of scientific evidence demonstrates the negative health impacts of low dose dietary exposure to hazardous pesticides. Pesticides with known carcinogenic, mutagenic and reprotoxic properties are of particular concern. At low concentrations such chemicals can evade the body's cellular defence mechanisms, thus doing more damage to human biological systems than when present at higher doses. Endocrine disruptors are also known to be active at extremely low concentrations, can cross the placenta and end up in human breast milk. They

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may cause severe harm to the embryo, the foetus and the infant throughout the developmental period.

- Up to 22% of food items analysed under the EU's 2007 coordinated food monitoring programme contained residues of the 23 hazardous pesticides which the Commission proposes to eliminate from the food chain. Such pesticides are listed as common food contaminants in all European Member States. Fruits and vegetables are worst affected.

Since 1993, some 129 new pesticides have been introduced to the European Union. Very few of these new compounds are among those proposed for elimination. The Commission's proposals would remove only a small number of predominantly older active substances; an approach which is both progressive *and* proportional.

- Europe cannot afford the cost of inaction. Public Health and the economy will both suffer if increasing numbers of the population are forced to battle chronic illnesses, reproductive obstacles and produce offspring with lower IQs.

**Given the substantial negative health impacts associated with dietary exposure to hazardous pesticides, the prevalence of these substances within the EU food chain, and the extreme vulnerability of the embryo, foetus and infant to these hazards, Women In Europe For A Common Future urges the Commission to maintain its present proposal for the elimination of such pesticides from EU food products. Ensuring the incorporation of this proposal into the Community strategy on the sustainable use of pesticides represents a substantial and essential development in defending public health in the European Union.**

Thank you for your consideration of these matters in the context of the proposed Regulation on pesticides.

Please do not hesitate to contact me should you require further information.

Yours Sincerely,

Sascha Gabizon, WECF  
International Director

Cc	Androulla Vassiliou	(Commissioner for Health)
	Philippe Brunet	(Head of Cabinet)
	Despina Spanou	(Deputy Head of Cabinet)
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