











NGO vote recommendations

in view of

the vote in the ITRE-Committee on the amendments to the Commission's proposal for a biocidal regulation (COM 267)

(7 April 2010)

Brussels, 6 April 2010

A healthy world for all. Protect humanity and the environment from pesticides. Promote alternatives.

To Members of the EP Committee for Industry, Transport and Research (ITRE)

NGO vote recommendations in view of the vote in the ITRE-Committee on the amendments to the Commission's proposal for a biocidal regulation (COM 0267), Brussels 7 April 2010

Brussels, 06 April 2010

Dear Member of the Committee,

On the 7th April 2010 you will vote on the amendments to the Commission's draft for a biocide regulation. These amendments are tabled by the ITRE rapporteur Sajjad Karim and further members of the Committee. Your decision can contribute to better regulate the authorisation of products like insecticides, disinfectants, nano-biocides and rodenticides. We urge you to ensure the highest level of protection for human health and the environment, since biocide products are typically used by consumers with limited awareness of the product and their impact. This can lead to misuse of the product and uncontrolled disposal of intrinsically hazardous substances which can have adverse effects, in particular to vulnerable groups and the environment. We believe that a revised and strengthened biocide regulation can also ensure a clear incentive framework for research and innovation in sustainable alternatives of pest management.

With regard to these aspects, Fédération Inter-Environnement Wallonie, Health and Environment Alliance (HEAL), Health Care Without Harm Europe, Pesticide Action Network (PAN) Europe, PAN Germany, PAN UK and Women in Europe for a Common Future (WECF) welcome and support the following amendments as they address significant challenges of the Commission's draft.

Please vote *for* the following amendments:

- ensure a clear framework to ban highly hazardous biocides (amendments 31, 72, 75)
- establish coordinated actions for the use phase of biocides (amendments 91 and 92)
- support products with substances of no concern (amendment 99)
- promote transparency (amendments 43, 174, 192-194)
- introduce efforts to identify and tackle impacts of nano-biocides (amendments 185, 186)

Furthermore, we believe that it is necessary to continue with the current standards for the functioning of a sustainable common market.

Therefore, please vote *against* the following amendments:

- introduction of vague exemptions that risk an EU-wide approval of highly toxic substances applied in drinking water plants (amendments 6 and 74)
- loopholes that prevent a clear and timely substitution regime (amendments 83-84, 109-116, 199)
- problematic simplification of the EU-wide distribution of products that may result in anti-microbiological resistancies or other serious impacts for human health and the environment (amendments 12, 30, 138-140)

- weakening of provisions for treated articles (amendments 36, 162-164, 167-169, 172-173)

We should be most grateful if you consider our recommendations.

Please do not hesitate to contact us for further information.

Yours sincerely

see contact

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