



To: Ministers of Environment, Ministers of Health and Ministers of Agriculture of the Member States of the European Union

Brussels, 23 July 2019

Subject: Your support to the ban of neurotoxic pesticides chlorpyrifos-ethyl and -methyl

Dear Minister,

We are writing to you to express our concerns over the current reapproval procedure of the organophosphate insecticides chlorpyrifos-ethyl and chlorpyrifos-methyl, and ask you to support a non-renewal for both substances. At the time of writing, the European Food Safety Authority (EFSA)'s peer-review of the risk assessment report (RAR) is overdue. This not only means that there is a serious risk that the deadline set for the renewal of both insecticides (31st January 2020) will be missed, but also that these hazardous substances, which are widely known as neurodevelopmental toxicants, could be tolerated on the European market for yet another year.

There is a compelling body of independent scientific evidence demonstrating the toxicity of chlorpyrifos-ethyl: exposure has been linked to decreased IQ, working memory loss, the development of autism and other neurodevelopmental disorders among children, even at low levels of environmental exposures. According to researchers' estimates, chlorpyrifos is responsible for an average IQ reduction by 2.5 points in every child living in Europe [1]. Studies also point at chlorpyrifos as a thyroid hormone disruptor, which could partly explain the effects mentioned above [2]. Beyond neurotoxicity, the substance has also been associated with metabolic disturbances, breast and lung cancers, and male infertility. Although chlorpyrifos-methyl is less documented, it has the same mechanism of action and a similar toxicity.

Recent press investigations [3], supported by independent reevaluation of the data [4], have shown severe flaws in the last approval processes of chlorpyrifos-ethyl and -methyl. In our opinion, this illustrates serious misconduct from the applicant and constitutes a violation of the EU Pesticide Regulation 1107/2009, which the European authorities failed to address and should not be repeated.

According to EU official monitoring data, chlorpyrifos-ethyl is widely present in fruits sold on the EU market, irrespective of the status of national authorisations [5]. Banning both chlorpyrifos-ethyl and -methyl provides a Europe-wide opportunity for health and would prevent potential regrettable substitution of the former by the latter.

Support exists for such a ban. Over 212,500 people have already signed a petition launched by SumOfUs, the Health and Environment Alliance (HEAL), Générations Futures, Ecologistas en Acción, and the European and German branches of the Pesticide Action Network [6]. European citizens would find it hard to understand that chlorpyrifos could be granted another year of approval, harming our children's brains, because of delays in the decision-making process.

The European Commission has publicly indicated that it is considering to draft a non-renewal proposal for chlorpyrifos-ethyl, and possibly for the methyl form. We urge you to back the ban of both substances, oppose any extension of the current approval and start withdrawing national authorisations granted to phytopharmaceutical preparations containing one or the other substance.

We thank you for considering our concerns and clarifying your intentions regarding the fate of chlorpyrifos-ethyl and chlorpyrifos-methyl. We remain fully available for further information and exchange on the points raised in this letter.

Yours sincerely,

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Executive Director at the Health and Environment Alliance (HEAL)

On behalf of:

- Ecologistas en Acción
- Générations Futures
- Health and Environment Alliance (HEAL)
- Pesticide Action Network Europe
- Pesticide Action Network Germany
- SumOfUs

References:

[1] *Neurobehavioral Deficits, Diseases, and Associated Costs of Exposure to Endocrine -Disrupting Chemicals in the European Union*. Martine Bellanger, Barbara Demeneix, Philippe Grandjean, R. Thomas Zoeller and Leonardo Trasande. *J Clin Endocrinol Metab*, April 2015, 100(4):1256–1266. <https://doi.org/10.1210/jc.2014-4323>

[2] Clearing our plates from toxic pesticides – A webinar trilogy making the health case for a ban on chlorpyrifos

<https://www.env-health.org/available-for-download-recordings-and-presentations-from-our-series-of-webinars-on-chlorpyrifos/>

[3] This series of collective investigation articles issued on 17th of June includes:

- Main portal (English): Investigative Reporting Denmark (<https://www.ir-d.dk/chlorpyrifos/>)
- In English: the EU Observer (<https://euobserver.com/health/145146>)
- In French: Le Monde (https://www.lemonde.fr/planete/article/2019/06/17/chlorpyrifos-les-dangers-ignores-d-un-pesticide-toxique_5477084_3244.html)
- In Dutch: Knack (<https://www.knack.be/nieuws/belgie/europa-onderzoekt-verbod-op-insectenvergif-dat-in-onze-voeding-opduikt/article-longread-1477255.html>)
- In Spanish: El Confidencial (https://www.elconfidencial.com/tecnologia/ciencia/2019-06-17/pesticia-agricultura-espana-peligro-ue-prohibicion_2073403/)
- In Polish: Newsweek (<https://www.newsweek.pl/polska/pestycydy-w-warzywach-i-owocach-unia-europejska-nie-reaguje-sledztwo-newsweeka/l94y80g>)
- In Slovenian: Oštro (<https://www.ostro.si/si/zgodbe/klorpirifos-neznani-pesticid-v-prehranski-verigi>)
- In Norwegian: Dagbladet (<https://www.dagbladet.no/nyheter/forbudt-insektmiddel-funnet-i-mat-over-hele-europa/71182049>)

[4] *Safety of Safety Evaluation of Pesticides: developmental neurotoxicity of chlorpyrifos and chlorpyrifos-methyl*. Mie, Rudén, Grandjean. Environ Health. 2018 Nov 16;17(1):77. doi: 10.1186/s12940-018-0421-y https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6238321/pdf/12940_2018_Article_421.pdf

[5] *Chlorpyrifos residues in fruits, the case for a EU-wide ban to protect consumers*, published June 2019 by the Health and Environment Alliance (HEAL) and Pesticide Action Network Europe. https://www.env-health.org/wp-content/uploads/2019/06/June-2019-PAN-HEAL-Briefing-chlorpyrifos_web.pdf

[6] SumOfUs petition: No more toxic chlorpyrifos in our food: <https://actions.sumofus.org/a/chlorpyrifos> (also available in [German](#), [Spanish](#) and [French](#)).

The **Health and Environment Alliance (HEAL)**'s transparency register nr: 00723343929-96.