



BRUSSELS, 9 OCTOBER 2023

To:
Member States' representatives,
Standing Committee on Plants, Animals, Food and Feed

Subject: Health groups' call for support to European Commission's proposal for non-renewal of five endocrine disrupting pesticides in EU Standing committee on pesticides (ScoPAFF 12/13 October)

Dear Member States' representatives,

The Health and Environment Alliance (HEAL) is a not-for-profit alliance representing over 90 public health and environmental groups across Europe. Today, we are writing to you in view of the EU Standing Committee on Plants, Animals, Food and Feed (ScoPaff) of 12/13 October 2023.

During this meeting, you will discuss and vote on a European Commission (EC) proposal to ban five active substances with endocrine disrupting (ED) properties [agenda items B. 04 to B. 07 and B. 09], namely asulam sodium, benthialdicarb, clofentezine, metiram, and triflurosulfuron-methyl.

We urge you to support this proposal for the following reasons.

These five active substances have been assessed in the light of the 2018 scientific criteria to identify endocrine disrupting active substances, leading to EFSA concluding that each of them meets the criteria for identification of endocrine disruptors for human health. The assessments of the ED properties for these substances already took a very long time and resulted in the granting of several ad-hoc administrative extensions past the initial expiry dates of their current licenses (2016 for metiram, 2018 for benthialdicarb and clofentezine, and 2019 for triflurosulfuron-methyl).

Based on EFSA's conclusions and in line with Article 4(1) and Point 3.6.5 of Annex II of Regulation 1107/2009, which provide that active substances with "endocrine disrupting properties that may cause adverse effects in humans" or "in non-target organisms" cannot be (re)approved in the European Union (EU), the European Commission proposal for non-renewal of these five substances is scientifically and legally justified and should be agreed upon without further delay.

As you are aware, significant delays in the introduction and implementation of the scientific criteria for the identification of endocrine disrupting properties of active substances past the 2013 deadline set out in the 1107/2009 regulation have allowed compounds with such properties to remain legally unidentified and therefore tolerated on the EU market for years¹. This has translated in unnecessary continued exposure of Europeans to harmful compounds that are flagged as priority substances for action in the Chemicals Strategy for Sustainability

¹ HEAL, A tale of disruption: looking back at one decade of Europe's (un)kept promises to address endocrine disrupting pesticides, <https://www.env-health.org/a-tale-of-disruption-looking-back-at-one-decade-of-europes-unkept-promises-to-address-endocrine-disrupting-pesticides/>

as well as in the Farm to Fork strategy under the EU 50% reduction target for the most hazardous pesticides.

We therefore call on you to support the European Commission proposal for non-renewal of these substances without derogations – which for the first time implements the exclusion criteria foreseen in the 1107/2009 regulation for ED pesticides since the introduction of the 2018 scientific criteria.

This is an important opportunity to show your commitment to minimise citizens' exposure to harmful endocrine disruptors.

Yours sincerely,

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The Health and Environment Alliance (HEAL) is the leading not-for-profit organisation addressing how the environment affects human health in the European Union (EU) and beyond. HEAL works to shape laws and policies that promote planetary and human health and protect those most affected by pollution, and raise awareness on the benefits of environmental action for health.

HEAL's over 90 member organisations include international, European, national and local groups of health professionals, not-for-profit health insurers, patients, citizens, women, youth, and environmental experts representing over 200 million people across the 53 countries of the WHO European Region.

As an alliance, HEAL brings independent and expert evidence from the health community to EU and global decision-making processes to inspire disease prevention and to promote a toxic-free, low-carbon, fair and healthy future.

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