



Dear Member of the European Parliament,

Re: Better protection of vulnerable groups, in particular children, is needed against the hazardous health effects of pesticides.

As a Member of the Internal Market and Consumer Protection Committee (IMCO), on 12 April you will be asked to vote an opinion on a **Regulation on the placing of Plant Protection Products on the market**.

The **Health & Environment Alliance** and the **European Public Health Alliance** are concerned that the debate and decisions taken will not adequately reflect recent scientific findings showing alarming evidence on the health effects of pesticide exposure.

Our key policy recommendations to improve the current legislative proposals can be summarised as follows:

- **Exclusion of unacceptable active ingredients (cut-off criteria) in Article 4 and Annex II of the Regulation for pesticide authorisation:** All substances with known or suspected carcinogenic, mutagenic, reprotoxic and endocrine disrupting effects, and that are persistent, bioaccumulative and toxic should not be approved. One critical step in ensuring hazardous substances do not gain authorization is to incorporate strict maximum "cut-off" criteria in risk assessment procedures based on the substance intrinsic properties and biological effects. An assessment of the combination, or "cocktail" toxicity of pesticides should also be considered and a precautionary approach should be ensured.
- **Comparative assessment and substitution by less hazardous or non-chemical alternatives in Article 24, 48 and Annex II of the Regulation for pesticide authorisation:** All chemical substances should be candidate for substitution by less hazardous substances or non-chemical alternatives. Candidates for substitution should be established in a list going beyond substances already classified as dangerous by existing legislation to include neurotoxic and immunotoxic substances. If non-chemical methods and practices are available for the crop in question, an active substance should not gain authorisation.
- **Protection of vulnerable groups and against combination, or "cocktail", effects of pesticides: both the Regulation on Authorisation and the Directive on the Sustainable Use of pesticides** should take into consideration the special vulnerability of children, women of child-bearing age and pregnant women. Article 4 and Annex II of the Regulation should also consider the possible combination toxicity of pesticides. Considering that the use of a single substance per crop is very rare, safety values should be further lowered if the toxic effects of two or more pesticides used together are likely to produce a more toxic effect than when either is used alone.

Progress made with this legislative process will determine the level of health protection afforded by pesticide regulation in Europe for the coming decades. We trust you and your political group will endeavor to put in place a Thematic Strategy, Directive and Regulation that reduces use and risks associated to pesticides, and strives for a better protection of children and future generations against the hazardous effects of pesticides.

We invite you to vote according to the Pesticides Action Network Europe, European Environment Bureau and Health & Environment Alliance recommendations and we would welcome the opportunity to discuss with you our suggestions for strengthening the current legislative proposals towards a better protection of human health.

Thank you very much for your attention.

Yours sincerely,

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The **Health & Environment Alliance (HEAL)** is an international non-governmental organisation that aims to improve health through public policy that promotes a cleaner and safer environment. Our work draws on the findings of the environmental health science revolution, which is revealing the impact of environmental degradation on health in an ever-widening range of diseases and conditions. We represent a diverse network of more than 50 citizens', patients', women's, health professionals' and environmental organisations across Europe with a strong track record in bringing environmental health science and policy to an increasing number of fora. Our vision is that of a healthy planet for healthy people.

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The **European Public Health Alliance (EPHA)** is a network of around 100 European non-governmental organisations and other not-for-profit organisations. EPHA works to promote and protect the health of people living in Europe, and to increase their participation in the decision-making process at all levels.

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