



Brussels, 16 February 2007

To: Ministers of the Environment

CC: Environment and Health Attachés of Permanent Representations of EU Member States to the European Union

Subject: Council conclusions on the Thematic Strategy on the Sustainable Use of Pesticides (COM(2006)372)

Dear Ministers and Permanent Representatives,

In preparation for the forthcoming EU Environment Council of 20 February 2007, we would like to express our views on one of the issues on the agenda, namely the Commission's proposal for a Thematic Strategy on the Sustainable Use of Pesticides.

We share the concerns expressed by Pesticides Action Network Europe, one of our members, in their letter of 12 February and support their demands.

In particular, we would like to draw your attention to the latest scientific evidence on the health effects of pesticides as a causing factor of cancer, neurodevelopmental disorders and endocrine disruption. The special sensitivity of children and other vulnerable groups should also be considered, and a precautionary approach should be taken to ensure the highest level of protection for people's health in Europe.

When drawing your conclusions on the above-mentioned Thematic Strategy, we therefore urge you to include in the text:

A ban of substances on the basis of their intrinsic hazard (cut-off criteria): all substances with or suspected carcinogenic, mutagenic, reprotoxic and endocrine disrupting properties as well as substances that are persistent, bio accumulative or toxic for health and the environment should not be approved. It is therefore necessary to ensure the introduction of hazard-based criteria in the Thematic Strategy for the Sustainable Use of Pesticides (more concretely in the Commission proposal for a pesticides Regulation COM (2006) 388).

Special provisions on the protection of vulnerable groups: Epidemiological studies and toxicological research both demonstrate the adverse health effects of pesticides on children and recognise that children are more sensitive than adults to chemical exposure. The embryo/foetal stage is the most vulnerable stage, when the developing organs and brain are known to be subject to environmental influences with critical windows of exposure at different points. Contact with pesticides at this stage can give rise not only to congenital malformations but also functional impairments expressed much later in life. Risk assessment mechanisms should take children's special vulnerability into consideration.

Precautionary principle: The precautionary principle should underlie a strategy for minimising the use of pesticides because of their potentially harmful properties. The precautionary principle is clearly stated in the proposal for a regulation on the placing of PPPs on the market but it is missing in the Thematic Strategy.

The Thematic Strategy on the Sustainable Use of Pesticides is a unique opportunity to achieve a high level of health and environmental protection by reducing exposure to all pesticides and achieving precautionary pesticide use reduction at the European level. We therefore urge you to take into consideration the points highlighted above when drawing your conclusions at the Council meeting.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Genon K. Jensen', written over a large, stylized, looped graphic element that resembles a lowercase 'j' or a similar flourish.

Genon K. Jensen
Executive Director,
Health & Environment Alliance

The Health and Environment Alliance (HEAL), formerly EPHA Environment Network (EEN), is an international non-governmental organisation advocating greater protection of the environment as a means to improving the health and well being of European citizens.

We are a diverse network of more than 50 citizens', patients', women's, health professionals' and environmental organisations across Europe with a strong track record in increasing public and expert engagement in both EU debates and the decision-making process.

The Health & Environment Alliance advocates the introduction and implementation of policies that protect the environment and promote sustainable development to improve people's health in Europe and the rest of the world. We aim to promote awareness among European citizens, policy-makers and NGOs of the links between health and the environment and the policy changes that can help or hinder progress towards sustainable development.