



**Pestizid Aktions-Netzwerk e.V.**

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# Towards pesticide-free food

PAN Germany's suggestions  
for a Codex Alimentarius reform



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Hamburg, October 2002





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**PAN Germany's suggestions**

**for a Codex Alimentarius Commission reform**



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© Pesticide Action-Network (PAN Germany)

Nernstweg 32, D-22765 Hamburg

Phone: 0049-(0)40-399 19 10-0

Fax: 0049-(0)40-390 75 20

Email: [info@pan-germany.org](mailto:info@pan-germany.org)

Homepage: [www.pan-germany.org](http://www.pan-germany.org)

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Authors: Wolfgang Bödeker, Matthias Frost,  
Christine Schmitt, Carina Weber

Editors: Christine Schmitt, Alexandra Baier



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## Abbreviations

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ADI:	Acceptable Daily Intake
CAC:	Codex Alimentarius Commission
CCPR:	Codex Committee on Pesticide Residues
FAO:	Food and Agricultural Organization
GATT:	General Agreement on Tariffs and Trade
GEMS:	Global Environment Monitoring System, part of FAO-programme
ICM:	Integrated Crop Management
IEDI:	International Estimated Daily Intake
IPM:	Integrated Pest Management
MRL:	Maximum Residue Limit
NGO:	Non-Governmental Organisation
PAN:	Pesticide Action Network
SPS-Agreement:	WTO Agreement on Sanitary and Phytosanitary Measures
STMR:	Supervised Trial Maximum Residue
TBT-Agreement:	WTO Agreements on Technical Barriers to Trade
TMDI:	Theoretical Maximum Daily Intake
WHO:	World Health Organization
WTO:	World Trade Organization















more important, do not take into account extraordinary consumption patterns as shown by children, ill or old people, or people in a certain region. Children, for example, have a higher food uptake in proportion to their body weight and thus are more vulnerable to adverse effects of chemical residues. Therefore in Germany, the precautionary principle is applied and all residue data are calculated on the basis of the average consumption of a 4 year-old girl<sup>14</sup>

- (c) that some food items already contain more than the permitted amount of pesticide residues due to the high pesticide use in agriculture. Even though illegal, these exceeded levels must be taken into account to get a realistic picture of the health hazard of different food combinations
- (d) that for many chemicals, there is no safe or acceptable residue level at all and any measurable presence as residue poses threats to human health and the environment.

### Recommendations for CAC reform

To correct the complicated and non-transparent procedure for calculating residue limits that still has major gaps, PAN Germany recommends the following reforms:

- the procedure for calculating the IEDI should be abandoned because it contains too many uncertainties
- a standard safety buffer needs to be incorporated into the TMDI that accounts for synergistic effects, unorthodox consumption patterns, vulnerable groups and exceeded residue levels
- there is a more urgent need both to recognize the frequency and inevitability of residues exceeding legal limits and to work towards pesticide-free food (see below).

### 3.2.2 What is Good Agricultural Practice?

The Codex-MRLs for pesticide residues are calculated on the basis of the Good Agricultural Praxis (GAP) of the member states. The GAP “encompasses a range of levels of pesticide applications up to the highest authorised use, applied in a manner, which leaves a residue which is the smallest amount practicable” (for complete definition see Annex 1).

However, this “smallest amount practicable” can differ considerably between countries. While many countries still authorise a high level of pesticide application, in other countries there is a tendency to limit pesticide application to Integrated Pest Management/ Integrated Crop Management (IPM/ ICM) practices and to encourage organic farming practices<sup>15</sup>. The CAC does not provide any transparent information on this issue. According to the new mandate of Risk Minimisation, the CAC should put an effort into scrutinising the GAP applied in the different countries. The PAN Germany study “From Law to Field” shows that pesticide application and thus pesticide

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<sup>14</sup> WHO and EEA (2002): Children’s health and environment: A review of evidence, [http://org.eea.eu.int/documents/newsreleases/iep\\_29.pdf](http://org.eea.eu.int/documents/newsreleases/iep_29.pdf) (see especially pesticides impact, pp: 141-156).

<sup>15</sup> According to a survey from 2002, the major part of ecologically cultivated area is located in Australia (7.7 mil ha), Argentina (2.8 mil ha) and Italy (ca. 1 mil ha) while the percentages are highest in Liechtenstein (18%), Switzerland (9%), Austria (8.6%), Italy (6.8%) and Finland (6.7%), [http://www.soel.de/inhalte/publikationen/s/74/5\\_Entwicklung.pdf](http://www.soel.de/inhalte/publikationen/s/74/5_Entwicklung.pdf).







### **To achieve a balanced participation of all stakeholders in the decision-making process**

- Better opportunities for developing countries and public interest groups should be established to raise their voice, e.g. through a trust fund for travel and accommodation costs if needed
- National delegations should consist of government representatives only, while public interest groups and the industry may take part as observers with a balanced number of representatives, respectively
- There should be an equally balanced representation of scientists with an industrial background and scientists belonging to public interest groups on the expert panels
- An appellate body should be established within the CAC that deals with public complaints concerning particular regulations, e.g. by initiating a special evaluation process on public request
- More effort should be put into publishing the legal texts of the CAC in a more simple and transparent manner.









## Pesticide Action Network

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PAN Germany was formed in 1984, two years after the founding of the international PAN, and following a hearing of the German Federal Parliament on the effects of exported pesticides in developing countries.

A broad range of groups and organisations from the fields of development work, environmental protection, consumer protection and agriculture were present at that hearing. The concern about the devastating effects of pesticide use, especially in developing countries, and Germany's central position in the world market for pesticides led to the founding of PAN Germany with the following aims: improving the co-ordination of already existing activities against the misuse of pesticides; encouraging the commitment against dangerous pest control measures, and strengthening the competence of critical experts.

PAN Germany has been working since then on various issues connected with pesticide use, in-

cluding pesticide residues in food, eradication of hunger, sustainable agriculture, pesticide use in households and other topics.

PAN Germany is an active part of PAN International. Founded in 1982, PAN International strengthens international co-operation on these issues working through five autonomous regional centres: PAN Europe (facilitated by PAN Germany and PAN UK), PAN Africa, PAN Asia, PAN North America and PAN Latin America.

### **For further information on the projects and activities of PAN Germany**

You are welcome to visit or contact us at

PAN Germany

Nernstweg 32, 22765 Hamburg

phone: 040-399 19 10-0, Fax: 040-390 75 20

Email: [info@pan-germany.org](mailto:info@pan-germany.org)

Have a look at our homepage

at: <http://www.pan-germany.org>

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### **Help support our work**

Organisations like PAN Germany cannot be successful without the financial help of people like you. Please consider a financial contribution to:

PAN Germany, 470588-307 Postbank Hannover, BLZ 250 100 30