



Background

The pesticide trade is one of the largest global businesses. At the same time, millions of people worldwide suffer from pesticide poisoning every year. Highly Hazardous Pesticides (HHPs) pose a particular threat to people and their environment. With a share of just under ten percent, Germany's role as an important player in the global pesticide trade, and its resulting responsibility are undisputed. Against this background, PAN Germany took a closer look at pesticide export activities, bearing the following questions in mind:

- How transparent is the export of pesticides from Germany?
- Does Germany export highly hazardous pesticides that endanger people's health and the environment in the importing countries?
- Do companies from Germany export pesticides whose use is prohibited in the EU?

The results and demands were compiled in the Report "Giftige Exporte"¹. The present document contains a brief summary of the findings in English.

For this purpose, the export data from the official reports of the Federal Office of Consumer Protection and Food Safety (BVL) on the notification of sales and exports of plant protection products in the Federal Republic of Germany 2003 - 2017² were compared with the PAN International List of Highly Hazardous Pesticides (PAN HHP List 2018)³, the EU pesticides database⁴ and / or (depending on the issue) with Annex I of Regulation (EU) No 649/2012 concerning the export and import of hazardous chemicals.

Every year, millions of people worldwide suffer from pesticide poisoning. Based on World Health Organization (WHO) figures from the 1990s, it can be estimated that today around 41 million people are victims of accidental pesticide poisoning every year. In addition, there are hundreds of thousands deliberate self-poisoning incidents (suicides) with pesticides. According to WHO studies, pesticides are the dominant means of suicide in large parts of the world. Easy access to pesticides increases the

¹ PAN Germany (2019): Giftige Exporte. Die Ausfuhr hochgefährlicher Pestizide aus Deutschland in die Welt.
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https://www.bvl.bund.de/EN/04_PlantProtectionProducts/03_Applicants/10_NotificationSalesExport/ppp_notificationSalesAndExport_node.html

³ PAN International (2018): PAN International List of Highly Hazardous Pesticides (PAN List of HHPs)

⁴ EU Pesticides database: <https://ec.europa.eu/food/plant/pesticides/eu-pesticides-database/public/?event=activesubstance.selection&language=EN>

suicide rate in the population. Experience from many countries around the world has shown: Limiting access to pesticides is an effective way to prevent pesticide poisoning.⁵

Recent research in seven Asian countries shows that 70% of pesticide users in rural areas are affected by pesticide poisoning⁶. The documented poisonings were caused by highly hazardous pesticides such as paraquat, lambda-cyhalothrin and chlorpyrifos.⁷ Similarly high levels of poisoning are reported from Latin America⁸

Acute pesticide poisoning and chronic diseases caused by pesticides are also widely prevalent in countries of the Global North. In addition, environmentally hazardous pesticides pollute waters and soils and contribute to the loss of biodiversity in these countries. An example of this is the USA, where agricultural workers have the highest rates of toxic chemical injuries and skin disorders of any working group in the US⁹

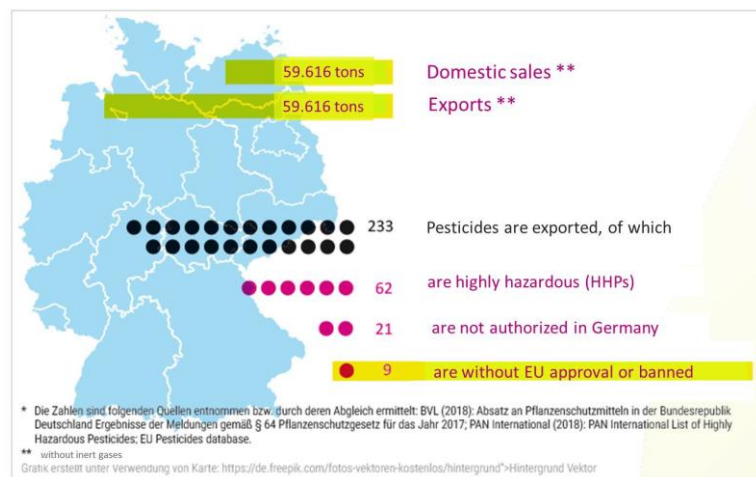
Identification of highly hazardous pesticides HHPs

The Food and Agriculture Organization (FAO) / World Health Organization (WHO) have established eight criteria for the identification of highly hazardous pesticides, of which at least one must be met in order to identify a pesticide as "highly hazardous". These include criteria for long term toxic effects like cancer, acute toxicity, hazards to the environment and pesticides known to cause severe or irreversible harm to health or the environment under normal conditions of use. The PAN International List of Highly Hazardous Pesticides (HHPs) is based on these criteria and expands and specifies them. Currently, more than 310 pesticide active ingredients are listed as highly hazardous in the PAN HHPs list.¹⁰

Facts and Figures

In 2017, Germany exported 59,616 tonnes of pesticide ingredients (excluding inert gases), which is 1.7 times the domestic sale. A total of 233 different pesticide active substances were exported, of which 62--more than a quarter of all exported active pesticide ingredients--are highly hazardous. Nine of these pesticides had no EU approval, including the herbicides cyanamide, acetochlor and tepraloxymid, which were

Germany - Sales and Exports of pesticide active ingredients 2017*



classified by the EU as carcinogenic (category 2) and toxic to reproduction (category 2); the

⁵ WHO (2017): World health statistics 2017: monitoring health for the SDGs, Sustainable Development Goals. Geneva

⁶ PAN Asia and Pacific (2018): Rights and Poisons is available at: <https://panap.net/2018/10/of-rights-and-poisons-accountability-of-the-agrochemical-industry/>

⁷ Glyphosat PAN Asia and Pacific (2018): Rights and Poisons is available at: <https://panap.net/2018/10/of-rights-and-poisons-accountability-of-the-agrochemical-industry/>

⁸ Bombardi, L M (2017): Geografia do Uso de Agrotóxicos no Brasil Conexões com a União Europeia. São Paulo: FFLCH - USP, 2017. <http://conexaoagua.mpf.mp.br/arquivos/agrotoxicos/05-larissa-bombardi-atlas-agrotoxico-2017.pdf>

⁹ PAN International (2010): Communities in Peril: Global report on health impacts of pesticide use in agriculture.

http://www.panna.org/sites/default/files/PAN-Global-Report_0.pdf

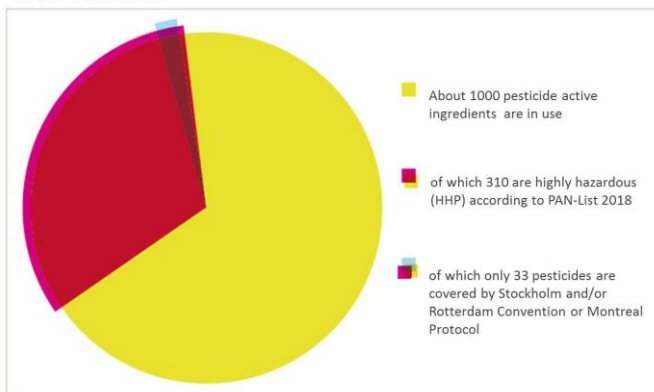
¹⁰ PAN International (2018): PAN List of HHPs. http://pan-international.org/wp-content/uploads/PAN_HHP_List.pdf

insecticide cyfluthrin which meets the second highest risk class for acute toxicity by WHO (WHO Ib); and the growth regulator cyanamide, which is still exported in high quantities, although its use has proven to harm farmers and therefore lost its approval in the EU in 2008, following repeated cases of poisoning in Italy. There is no law that prohibits the export of HHPs from EU Member States, even if these are pesticides whose use in the EU is banned for health and environmental reasons. These double standards are highly problematic for reasons of health and environmental protection and they violate human rights.

Large quantities, lack of transparency

The evaluation of the available data proves that companies based in Germany export considerable quantities of highly hazardous pesticides, including pesticides that have long lost their approval in the EU. The published data on export quantities is not completely accurate, as the export volume for each active substance is only indicated in quantity classes instead of exact figures in kilograms. Only for selected HHPs information on importing countries is unrestrictedly accessible to the public. As a result, there is still a lack of transparency with regard to the exact export quantities and the recipient countries. However, transparency is necessary in order to monitor and evaluate export activities and to identify problematic double standards. The enforcement of regional and global regulations against double standards in pesticide trade is necessary to protect people in low- and middle-income

Internationally recognized legally binding regulations only cover 3,3 Percent of all pesticides in use



countries from exports of highly hazardous pesticides which are already banned in the exporting country due to health, environmental or quality reasons. We also need binding international regulations for the phase-out of highly hazardous pesticides and their replacement with non-chemical measures and agroecology. **To date, only 3.3 percent of all pesticides in use worldwide are regulated strictly e.g. globally restricted in trade or banned worldwide by binding international**

conventions such as the Stockholm Convention (POP Convention), the Rotterdam Convention (PIC Convention) or the Montreal Protocol.

Banned pesticides - from Germany to the world

Though the growth regulator cyanamide lost its approval in the EU in 2008 due to its harmful health effects, which led to considerable occupational poisoning of farmers in Italy in the early 2000s, the pesticide leads the export list with 2,500 - 10,000 tons in 2017. Cyanamide is toxic if swallowed, it causes severe eye damage and can cause skin irritation and allergic skin reactions. Cyanamide can cause vomiting, shortness of breath, drop in blood pressure and tachycardia. The EU and the US

Pesticides that have been exported without EU approval from Germany		
pesticide	Exported volume in tonnes	No EU approval for agricultural use since
Cyanamid	2.500 – 10.000	2008
Acetochlor	25 – 100	2011
Iprodione	25 – 100	2017
Tepraloxdim	10 – 25	2015
Cyfluthrin	1,0 – 2,5	2016
Bendiocarb	< 1,0	2002
Chlorfenapyr	< 1,0	2002
Flocoumafen	< 1,0	2004
Linuron	< 1,0	2017

regulatory authority EPA classified the active substance as potentially carcinogenic in humans¹¹.

For the majority of pesticides, information on the export destination is not freely available. Only for so called "PIC- pesticides" which are covered by the Rotterdam Convention such information is available. For selected pesticides, a comparison with the corresponding publications of the European Chemicals Agency ECHA enabled us to identify the importing countries of pesticides exported from Germany and other EU countries that have no EU approval.

Destination countries for pesticides without EU approval exported from Germany and other EU countries *



Changes are needed to ensure a healthy world for all.

PAN Germany asks for

- The elimination of double standards in the pesticide trade which includes the prohibition by law in the exporting country to produce and export pesticides that are banned or not approved for environmental or health protection.
- Greater efforts to promote non-chemical alternatives, such as organic farming and agro-ecology at national, regional and international level,
- The enforcement of a binding obligation on the chemical industry to assume full responsibility for the life cycle of its products,
- The revising and strengthening of the International Code of Conduct on Pesticide Management
- The inclusion of a mechanism of action under the successor to the global policy framework SAICM (Strategic Approach to International Chemicals Management) for elevating an Issue of Concern, such as HHPs, that has not received due attention and action so far¹²
- More transparency regarding the publication of export data indicating the exact amounts of exports (in Kilogram) and the importing countries
- A legally binding treaty on life-cycle management of pesticides that includes a phase-out of HHPs.

¹¹ PPDB: Pesticide Properties Data Base University of Hertfordshire. <https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/184.htm>

¹² <http://www.saicm.org/Portals/12/documents/meetings/IP3/stakeholders/NGO-Information-doc-on-loC-criteria.pdf>