

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Forty-second Session

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Comments of the HNF on CCPR

The **First Problem** with all of these pesticides is that they are cumulative. They accumulate in the body, even at low doses, and over time they accumulate greatly & detrimentally to humans. This has not been considered by Codex in setting the MRLs here.

The **Second Problem** is essentially one of Synergy. They are often used TOGETHER with other pesticides & herbicides. And they have never been tested for safety when used together like this. We do not even know what harm their interactions can cause. We suspect these will be even more harmful than when they are used alone and, indeed, science points in this direction.

The **Third Problem** is that these pesticides are Endocrine Disruptors, Gender Benders, even at low levels. It has been demonstrated that fertility problems and birth problems result from their use. This is an increasing concern that we cannot let these problems continue. We must be especially cautious in approving any MRLs for endocrine disruptors.

One of our introductory speakers yesterday morning very correctly stated that **“We cannot have food security without food safety.”** We agree.

The EU and others at CCPR and here at CAC – in written comments – have mentioned toxicological and similar concerns with a number of the pesticides up here for adoption.

We agree with the concerns expressed by the EU and supported by Norway & Switzerland at CCPR, and for that very reason we ask that none of these MRLs be adopted but especially those for DIQUAT, IMAZALIL, PROPICONAZOLE, and NORFLURAZON **NOT** be adopted and that they be sent back to CCPR for further review & discussion. We ask that our concerns be noted in the Report.