

The EU Pesticide Blacklist



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Lars Neumeister



Content

Acronyms	5
Foreword by publisher	6
1 Introduction	8
2 Database	9
3 Blacklist Criteria.....	11
4 Scoring	15
5 Results.....	16
6 Limitations	17
7 Literature.....	20
Annex 1: Greenpeace Pesticide Blacklist	23
Annex 2: Scoring System.....	30
Mammalian toxicity.....	30
Acute Toxicity Score	30
Carcinogenicity Classification and Scoring	31
Mutagenicity	33
Reproductive and developmental toxicity.....	34
AOEL/ADI (Acceptable Operator Exposure Level/Acceptable Daily Intake)	34
Immunotoxicity	35
Endocrine Disruption	35
Environmental toxicity	36
Acute toxicity Algae	36
Acute toxicity Daphnia and Fish.....	36
Acute toxicity birds	37
Beneficial organisms.....	37
Honey bees.....	38
Environmental fate and transport.....	38
Bioaccumulation.....	38
Persistence in soil, sediments and water	39
Leaching potential	39
Volatility	40
Half-life on plants.....	40
Annex 3: Comparison of toxicological thresholds.....	41

Acronyms

ARfD	Acute Reference Dose
AOEL	Acceptable Operator Exposure Level
a.i.	(pesticide) active ingredient
ADI	Acceptable Daily Intake
BCF	Bioconcentration Factor
Cal P65	California's Proposition 65 - the Safe Drinking Water and Toxic Enforcement Act
CMR	Carcinogenicity, Mutagenicity, Reproductive and developmental toxicity
DAR	Draft Assessment Reports
EC50	Effective Concentration, 50%
ECHA	European Chemical Agency
EFSA	European Food Safety Authority
EU	European Union
EUDB	EU Pesticide Database
FAO	United Nation Food and Agriculture Organization
GHS	Globally Harmonized System
GUS	Groundwater Ubiquity Score
HHPs	Highly Hazardous Pesticides
IARC	International Agency for Research on Cancer
JMPM	The FAO/WHO Joint Meeting on Pesticide Management
LC50	Lethal Concentration, 50%
LD50	Lethal Dose, 50%
LOAEL	Lowest observed adverse effect
LR50	Lethal Rate, 50%
NOAEL	No Observed Adverse Effect Levels
NOEL	No Observed Effect Levels
PAN	Pesticide Action Network
POEA	Polyethoxylated Tallow Amines
SDS	Safety Data Sheet
TLI	Toxic Load Indicator
US-EPA	United States Environmental Protection Agency
WHO	World Health Organization

Foreword by publisher

The third edition of “The Blacklist of Pesticides” focuses on the 520 active ingredients authorized for use in the European Union. This catalogue of pesticides is not just a list of substances classified according to their potential human health and environmental hazard but foremost a tool to identify and discourage the use of pesticides with high toxicity. Since no criteria has been adopted yet to define endocrine disrupting chemical (EDC) pesticides the blacklist could not cover all potentially EDC pesticides. The list will in the future be broadened to include all pesticides with endocrine disrupting properties.

The study is an essential tool for producers, retailers and others in the food chain to immediately ban the most hazardous pesticide agents from the production chain. This first step is a vital one towards minimizing and ultimately replacing synthetic pesticides in farming with non-chemical practices where pests and diseases can be effectively managed.

Compared to the two previous versions of “The Blacklist of Pesticides”, this new one takes into account extra criteria for hazard evaluation, updates all existing data and supplements the content with new material. For instance, further criteria to assess environmental impacts such as toxicity to aquatic and beneficial organisms have been added. New criteria have been included to judge pesticides’ environmental fate, such as plant half life, leaching potential and volatility.

Greenpeace is active in putting pressure to reduce pesticide contamination of our food and the environment. Exceedances of the maximum residue levels have decreased but there are still several reasons for concern. Greenpeace and food safety agencies have repeatedly detected highly hazardous substances in end-products and the environment.

The overall use of pesticides in agriculture has not decreased at all, with overwhelming consequences for the environment. Numerous hazardous active substances are still being used on a large scale in European fields. Substances that can cause cancer, damage genes or disrupt the hormonal balance keep contaminating our soils and waters and affecting biodiversity and people, especially pesticides users, who are directly exposed to them.

Greenpeace has been calling for years to end the use of synthetic chemical pesticides in agriculture, starting from the most hazardous ones. This present study identifies which of the many pesticide agents currently authorized in the European market are the most dangerous and should be replaced as a matter of priority.

Another growing problem is multiple contamination by different pesticides. No toxicologist is able to predict now what kind of impact such pesticide cocktails of potentially harmful substances could have on human health or the environment. Such a striking lack of scientific knowledge about these risks highlights the need for urgent application of the precautionary principle. Multiple contamination must be avoided and, as an immediate first step, significantly reduced.

Unless under specific circumstances few of the pesticides on the blacklist are allowed in organic farming, but as Greenpeace recognizes that those which are used could cause problems it has called for more research so they can be replaced ecologically. Despite these concerns Greenpeace

strongly believes that organic farming is on a progressive path towards effective sustainable farming, positively contributing to better soil, water, wildlife, environment and health compared to industrial agricultural practices.

Greenpeace regularly conducts testing of pesticide residues from our fields to the plate, working with farmers, retailers and politicians to reduce the overall use of pesticides and boost the adoption of ecological farming practices.

1. As a first step phasing out the 111 pesticides with **at least** 1 cut-off criteria for human health
2. As a second step phasing out the 62 pesticides with **at least** 2 cut-off environmental criteria
3. As a third step phasing out the remaining 36 pesticides, which are listed because of their high overall score.

Phasing out the most damaging pesticides must be seen only as a first move in the right direction. Long term we urgently need to move away from chemical pesticides. It is of great importance to avoid simplistic substitution effects such as using a less harmful substance, but in higher quantities. Pesticides should not be substituted with other pesticides but with better, more ecological farming practices.

Greenpeace calls on politicians, market actors, farmers and the research community to adopt the necessary changes that would drive agriculture away from its current dependency on synthetic chemical pesticides and fertilizers towards ecological farming practices.

Only ecological farming is able to protect ecosystems, food diversity and security.

01

Introduction

In February 2008, Greenpeace Germany published for the first time an evaluation of basically all marketed pesticide active ingredients globally. In 2010, the list was updated and evaluation parameters were added and modified. One of the objectives for developing such a list was to provide the organization with the necessary scientific basis to campaign on the reduction of pesticide residues in food. The list was aimed at German retailers which internally maintain negative/positive lists.

The initial idea was to have only one list with a scoring system (highest score= highest overall toxicity), with a pesticide with one unwanted property e.g. mutagenicity, but a low score for acute toxicity and environmental parameters would score better than a pesticide with higher scores in less severe categories.

According to this, the outcome of the Greenpeace evaluation was three different lists:

- ▶ a black list where a pesticide met one of several toxicity cut-off criteria or scored very high in the total ranking
- ▶ a grey list where pesticides, which did not meet cut-off criteria, were evaluated by a complex scoring system based upon 17 parameters
- ▶ a yellow list which contained all pesticides where not enough data was available.

After 2010, the original scoring system was used independently from Greenpeace by Lars Neumeister to develop an instrument called “Toxic Load Indicator” (TLI). The TLI is designed as an open source scoring system.

For the creation of a revised European Pesticide Blacklist for Greenpeace, the scoring system as applied for determining the Toxic Load Indicator and two additional criteria previously used (endocrine disruption, immunotoxicity [Sensitization]) are assessed to evaluate pesticides authorized for use in the European Union. The highest possible score for a pesticide active ingredient would be 176 points (see Annex 2).

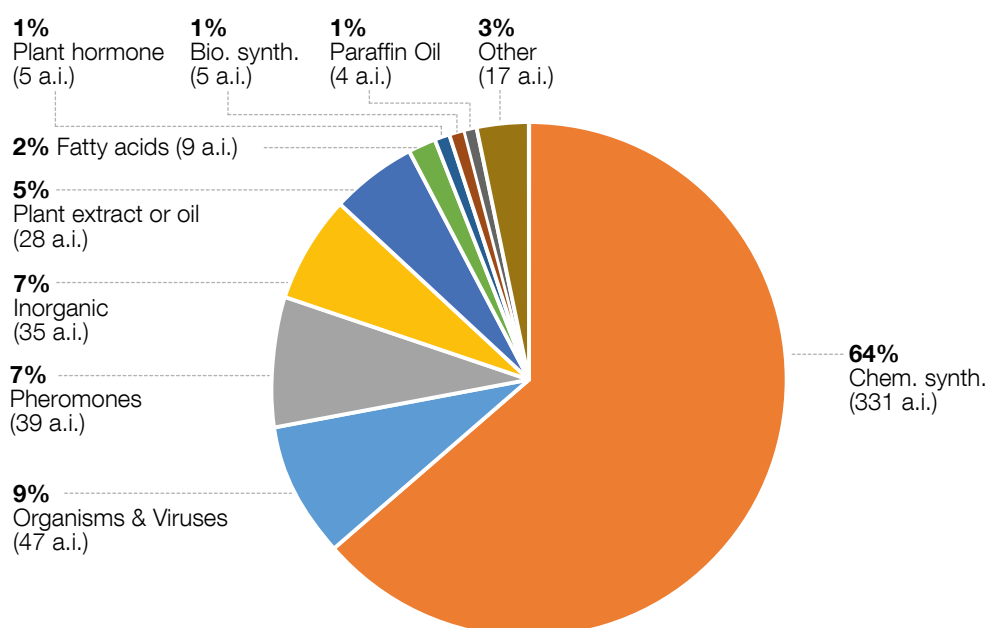
02

Database

The European Commission maintains an online pesticide database (EC 2016), which allows a complete data download and contains numerous information such as the authorization status, the hazard classification and data on some toxicological parameters (ADI, ARfD and AOEL values). A complete list of authorized pesticide active ingredients is also available in Annex I of the consolidated version (17th of September 2015) of Regulation (EU) No 540/2011. The Annex contains chemical identifiers such as CAS number, CIPAC number and the chemical name. Both data references were merged to create a starting list of EU approved pesticides. They usually do not contain all commonly marketed derivatives (salts, esters, isomers etc.)¹. Therefore, the list was edited accordingly using national authorization data.

Currently, about 520² active ingredients (a.i.) are authorized for used in the European Union. As can be seen in Figure 1, the majority of all authorized pesticides are of chemical-synthetic origin (64%). Inorganic substances, organisms and viruses, plant extract and pheromones together represent about 28%. The following figure shows the distribution of the currently approved pesticide by “chemical” type.

Figure 1: Distribution of all 520 currently approved pesticides (EU) by “chemical” type (own evaluation)



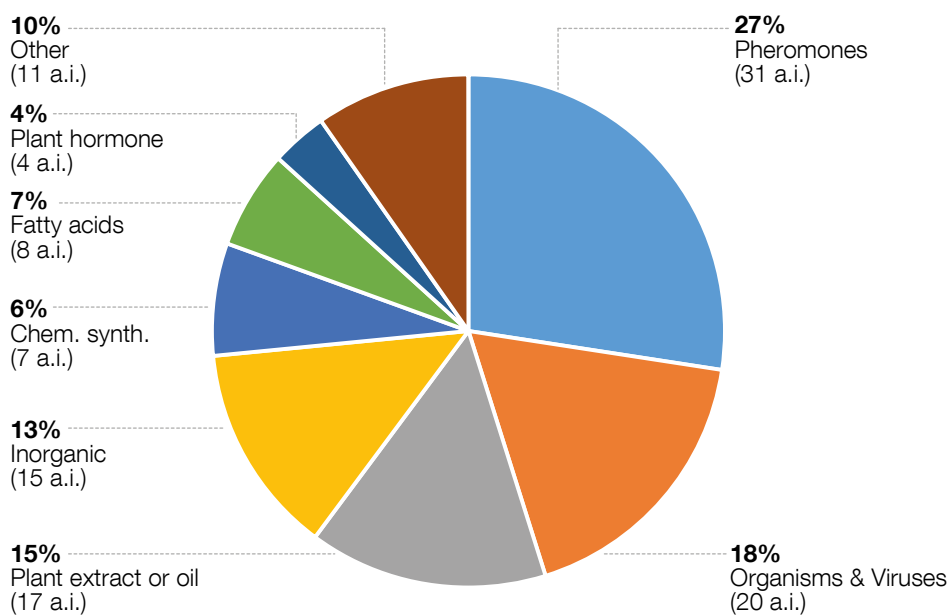
¹ For example: glufosinate is listed, but the marketed formulation contains the salt glufosinate-ammonium.

² The number depends on how the active ingredients are counted. The EU tables do not contain all marketed derivatives but in some cases the basic substance is not market relevant. We identified 520 relevant substances, including several marketed derivatives and provisional authorizations.

The current list of approved pesticide active ingredients contains about³ 110 “low risk”⁴ pesticides. “Low risk” pesticide is the short term for pesticides active ingredients which either fulfill the criteria for indications of no harmful effects set by Commission Regulation (EC) No 1095/2007 or meet requirements set in point 5 of Annex II of Regulation (EC) 1107/2009 and were which were authorized under the former Directive 91/414/EEC (about 105 pesticides, mainly through Directive 2008/127/EC and 2008/113/EC) or under the current Regulation (EC) No 1107/2009 (five pesticides). With Regulation (EC) No 1107/2009 “Low-risk active substances” became a regulatory term.

Most of these “low risk” pesticides are pheromones, plant extracts or oils, organisms/viruses and inorganic substances, which together constitute over 70% of the “low risk” pesticides. Altogether, about 21% of all authorized pesticides are authorized as “low risk” pesticides.

Figure 2: Distribution of the currently approved “low risk” pesticides (EU) by “chemical” type (own evaluation)



3 There are several groups which may contain several substances like “Repellents by smell of animal or plant origin/ fish oil”, “Fat distillation residues” or “Straight Chain Lepidopteran Pheromones”.

4 Commission Regulation (EC) No 1095/2007 (4) as well as Annex II of Council Regulation (EC) No 1107/2009 define criteria for “low-risk active substances”.

03

Blacklist Criteria

Compared to the previous version of the Blacklist, the criteria/parameters for defining a black listed pesticide and for the scoring system are different. Table 1 shows a comparison between the previous and the revised parameters.

Table 1 Parameters evaluated by Greenpeace 2010 and 2016

Nr.	Criteria	Indicator	Applied 2010 (black listed [BL] and/or score)	Applied 2016 (black listed [BL] and/or score)
1	Health hazards	Acute toxicity (short term toxicity user)	BL & Scoring	BL & Scoring
2		Carcinogenicity	BL & Scoring	BL & Scoring
3		Mutagenicity	BL & Scoring	BL & Scoring
4		Reproductive and Developmental toxicity	BL & Scoring	BL & Scoring
5		Operator Toxicity (Acceptable Operator Exposure Level) and/or Chronic Toxicity (long term toxicity, expressed as ADI) (minimum value)	Scoring	BL & Scoring
6		Immunotoxicity	Scoring	Scoring
7		Acute toxicity (short term toxicity consumer expressed as ARfD)	BL & Scoring	No
8		Neurotoxicity	BL	No
9		Corrosive properties	Scoring	No
10		Explosive properties	Scoring	No
11	Endocrine Disruption	Endocrine effects on human health and environment	BL & Scoring	BL & Scoring
12	Environmental toxicity	Aquatic toxicity (Algae)	No	BL & Scoring
13		Aquatic toxicity (Invertebrate, Fish)	BL & Scoring	BL & Scoring
14		Toxicity to birds	BL & Scoring	BL & Scoring
15		Toxicity to beneficial organism (predator, parasitoid)	No	BL & Scoring

16	Environmental toxicity	Toxicity to honey bees	BL & Scoring	BL & Scoring
17		Toxicity to earth worm (indicator for soil dwelling organisms)	BL & Scoring	No
18	Environmental fate	Bioaccumulation	BL & Scoring	BL & Scoring
19		Persistence	BL & Scoring	BL & Scoring
20		Leaching potential	No	Scoring
21		Volatility	No	Scoring
22		Plant Halflife	No	Scoring

Similar to the previous approach, a pesticide rating the maximum of ten (blacklist criterion) in one of the health hazard categories is black listed.

In the category “Environmental toxicity” and “Environmental fate”, the previous approach used in 2010 is maintained: A pesticide qualifies as a black list pesticide when it scores highest of ten (cut-off criterion) in at least two of the following categories:

- ▶ Aquatic toxicity (Algae)
- ▶ Aquatic toxicity (Invertebrate [Daphnia], Fish)
- ▶ Toxicity to birds
- ▶ Toxicity to honey bees
- ▶ Toxicity to beneficial organism (commonly insect predators, parasitoids)
- ▶ Persistence
- ▶ Bioaccumulation

The criteria are revised as follows:

- 1 In the previous evaluation system, the environmental toxicity and the environmental behavior of pesticides were, compared to human health, under-represented. Now more information on ecotoxicity and environmental behavior is considered.
- 2 The evaluation for the acute toxicity has changed to the new GHS (as implemented by EU Regulation (EC) No 1272/2008) and the changed WHO classification (WHO 2009). Instead of individual GHS hazard classifications, the Acute Risk Category is used for the assessment. The highest Acute Risk Category for a given pesticide reflects the highest toxicity among all exposure pathways (oral, dermal, inhalation) and is used for the blacklist assessment. In the criterion acute toxicity, these adjustments generate for some highly toxic substances a lower score than before. However, the high toxicity of these substances (specifically to pesticides users) is now reflected in the new criterion “Acceptable Operator Exposure Level” (AOEL) (see below).

-
- 3 Neurotoxicity is not directly reflected anymore because of a lack of consistent data especially in the field of developmental neurotoxicity and a lack of specificity. About 30% of all newly authorized active ingredients appeared on the market after 2005 and they are not reflected by older or newer reviews on neurotoxicity (see for example Mokarizadeh et al. 2015; Corsini et al 2012; Grandjean 2013; Bjørling-Poulsen et al. 2008). Furthermore, scientific articles on neurotoxicity often assign specific effects to a whole group of pesticides (such as organophosphate, pyrethroids, dithiocarbamates etc. – see for example Shelton et al. 2014, Bjørling-Poulsen et al. 2008). That ample approximation only allows a “Yes” or “No” evaluation and does not reflect that individual pesticides within these groups may be more toxic than others.

An internal comparison of NOELs (No Observed Effect Levels) for effects on the nervous system and/or the thyroid⁵ (based on the Draft Assessment Reports (DARs) created for the authorization procedure, EFSA 2014) with the EU ADI (EU DB (2016)) values showed that the ADIs seem to represent a useful indicator for specific neurotoxic effects under investigation (see Annex 3). The ADI is therefore used to reflect known neurotoxic effects, but also other potential chronic effects since it is based on results of a large number of toxicity tests.

In addition, the ADI is set for almost all active ingredients (while the ARfD is not), and the ADI is generally lower than the ARfD and thus more protective in most cases. The AOEL is newly introduced as evaluation criterion, it is derived in a very similar way to the ADI and correlates well with it. The ADI is in most cases (>75%⁶), lower than or equal to the AOEL, but in some cases ADI are not set, if consumer exposure is not anticipated. The AOEL presents risks to pesticides users better than the ADI. When both values exist, the lower value is used for the evaluation.

- 4 The acute earthworm toxicity was replaced by toxicity to beneficial organisms (parasitoids, invertebrate predator) important for natural pest control. Pesticides disrupting natural pest control can have severe effects on the agro-ecosystem and lead to even more pesticide use (see Reuter & Neumeister 2015). Additionally, the data on acute earthworm toxicity are less differentiated: Most values for Active Ingredients authorized in the EU given are “>500” or “>1000” (mg/kg; LC50 14 days) and the commonly tested compost worm (*Eisenia fetida*) is a rather insensitive test species (Shahla & D’Souza 2010, Pelosi et al. 2014).
- 5 Regarding the acute bird toxicity, the oral lethal dose for 50% of the tested bird population is used. The previously applied Hazardous Dose developed by Mineau et al. 2001 was not updated since its publication, and thus does not reflect pesticide newly marketed since 2001.
- 6 The evaluation for the aquatic toxicity is now based on lethal concentration for 50% of the tested populations (fish or invertebrate) and reduction of algae growth for 50% of the tested populations. For the ranking, the toxicity scale of the US EPA⁷ is used. The previously applied Risk Phrases according to Directive 67/548/EEC were not very differentiated and did not allow a ranking below an LC/EC50 of 1 mg/L.

5 Bjørling-Poulsen et al. 2008 relates changes in the thyroid function to neurotoxicity.

6 ADI and AOEL values were downloaded from the EU Pesticide Database (EU DB 2016) and compared.

7 <https://www.epa.gov/pesticide-science-and-assessing-pesticide-risks/technical-overview-ecological-risk-assessment-0>

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- 7 The criterion “Explosive” became obsolete in the EU context, explosive pesticides are not authorized.
 - 8 The scaling changes from a 0-5 ranking to the 1-2-5-8-10. That emphasizes higher toxicity and gives less weight to data gaps which have the default value of 5 out of 10 instead of 3 out of 5.
 - 9 The previous Greenpeace blacklists evaluated pesticides marketed globally, for example in the USA. In order to achieve a good data coverage for the global list, some reference lists from US governmental or state authorities had been used (EPA TRI List; California’s Proposition 65 List). These lists do not match completely with the list of EU authorized pesticides⁸. In addition, the EPA-TRI (2016) listings represent the lowest LOAEL in a specific effect category independent from the height of the dose causing that critical effect⁹. Reference doses (such as the ADI) derived from a NOAEL allow a better evaluation, because they are based on studies which delivered doses without an observed effect. The new Blacklist criteria apply the ADI instead of EPA-TRI and Californian Proposition 65 (OEHHA 2015) listings. A pre-check showed that all pesticides classified as “developmental toxin” by OEHHA (2015) or by EPA-TRI (2016) score “high” to “very high” under the criterion ADI/AOEL.

For the new Blacklist, all underlying data can be found in publicly available online databases and lists – the Pesticide Properties Database maintained by the University of Hertfordshire (Lewis et al. 2016) as well as the EU Pesticide Database are accessible online (refer to EU DB (2016)) and contain all data used for the Blacklist evaluation¹⁰.

8 Only 61 EU authorized pesticide are on the US EPA TRI List: <https://www.epa.gov/toxics-release-inventory-tri-program/tri-listed-chemicals> and only 40 EU authorized pesticide are on the Prop 65 List http://oehha.ca.gov/prop65/prop65_list/Newlist.html.

9 The primary purpose of the US Toxic Release Inventory is the monitoring of emissions; the categorization of potential health effects serves as additional information.

10 For this evaluation a Microsoft Access Database containing the pesticides property database and the bio-pesticides property database was obtained (on 25.02.2016) from University of Hertfordshire.

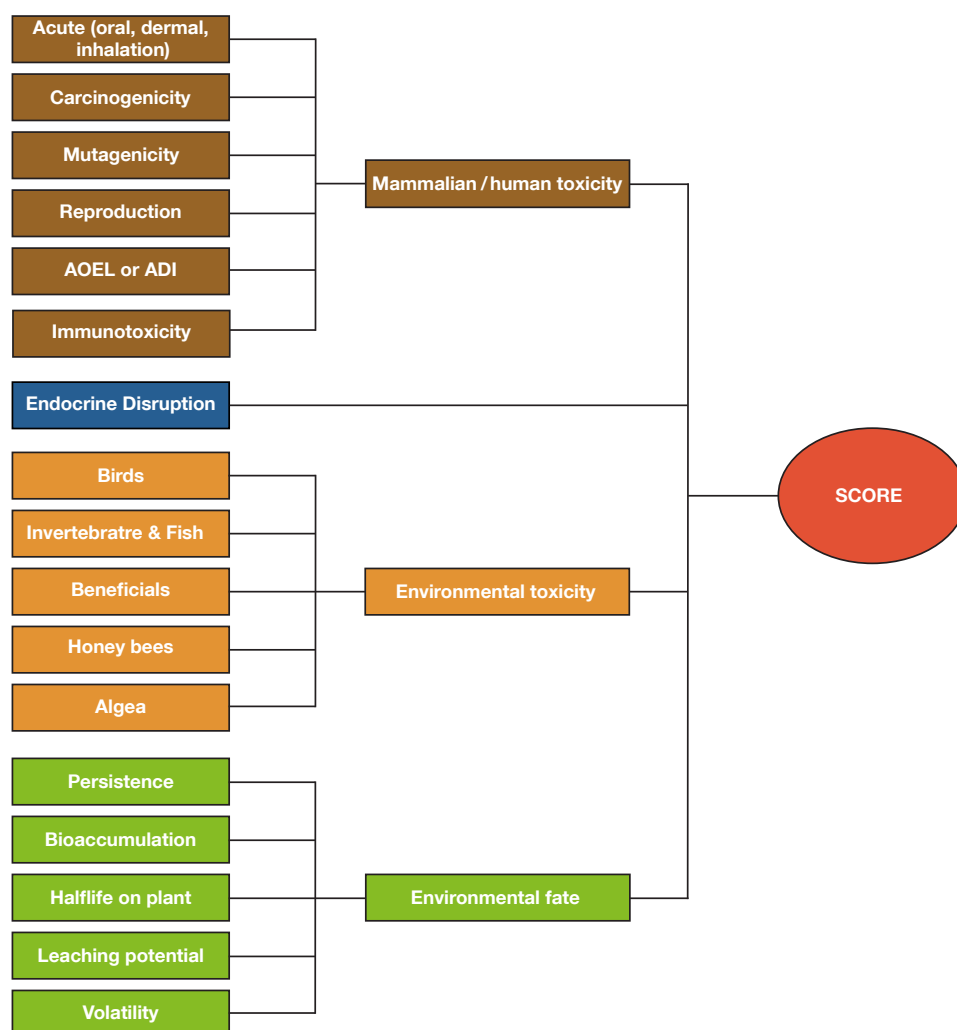
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Scoring

In order to identify pesticides which may have a high total toxicity, but do not meet blacklist criteria, the scoring system is used to calculate a sum of scoring points based on toxicological and environmental data for all authorized pesticide active ingredients. The scoring system is described in detail in Annex 2.

Figure 3 gives a graphical overview of the criteria used for the scoring.

Figure 3: Criteria evaluated in the scoring system



05

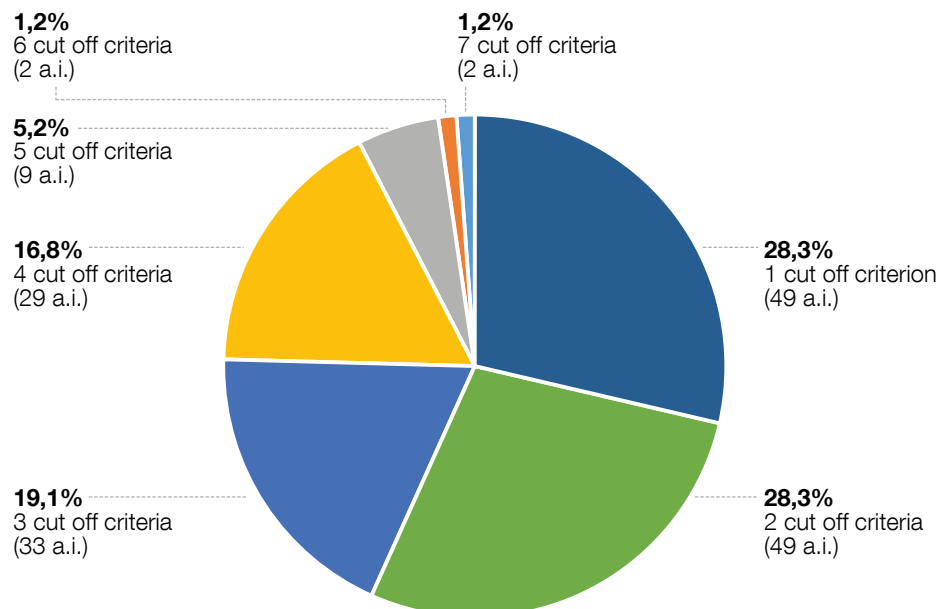
Results

Overall, the Blacklist contains 209 pesticide active ingredients (a.i.), which represent about 40% of all authorized pesticides in the European Union. Among these, 173 pesticides have such a high toxicity in at least one category that they meet the Blacklist cut-off criteria. Of these, 35 active ingredients meet at least one health cut-off criterion, 62 active ingredients meet at least two of the six selected environmental criteria and 76 active ingredients meet health and environmental criteria.

The following graph shows the number of pesticides by number of cut-off criteria, for example:

- ▶ two pesticides meet seven cut-off criteria,
- ▶ another two pesticides meet six cut-off criteria,
- ▶ and another nine pesticides meet five cut-off criteria.

Figure 4: Number of pesticide meeting “cut-off” criteria



Pesticides not meeting cut-off criteria were evaluated using the scoring system (see Annex 2) and were sorted by the total score. As in the previous blacklist the ten percent (n = 36 pesticides) with the highest score were added to the Blacklist. All pesticides classified as “Blacklist” pesticides are listed in Annex 1.

06

Limitations

The parameters to identify a Blacklist pesticide are limited to those for which data are publicly available and standardized testing procedures exist. That ensures maximum transparency, but has some limitations:

Scope

Adverse effects of pesticide use occur mainly through three factors or a combination thereof:

1. Scale of usage
2. Misuse and
3. Chemical properties including toxicity.

The first two factors are not addressed by this Blacklist, and a Blacklist is not the most suitable instrument to address these factors. A Blacklist is just one tool in a “pesticide reduction toolbox” and needs to be accompanied by other measurements (see for example Reuter & Neumeister 2015, Chapter Pesticide use and risk reduction).

Reliance on authorization data

The scoring of the Blacklist is largely based on the outcome of the European pesticide authorization and chemical registration process. Many data for these assessments derive originally from manufacturers who are obliged to submit data dossiers. The involved governmental risk assessment in these processes has some serious flaws (see for example: Knäbel et al. (2012); Knäbel et al. (2014) and Stehle & Schulz 2015 and further below). In some areas (eco-toxicity, environmental fate) independent research and regional monitoring, but also commonly observed effects (like the bee population decline) can trigger re-assessment of substances or the adjustment of the risk assessment. The attention to neo-nicotinoid pesticides due to their high bee toxicity caused, for example, a re-evaluation of imidacloprid and acetamiprid which resulted in the knowledge that both are developmental neurotoxins and require lower toxicological thresholds (EFSA 2013).

The situation is more complicated regarding potential chronic effects on human health. In order to observe such effects long term tests with mammals are usually needed, but these tests are not common among independent researchers (also for ethical reasons). Sometimes they conduct a long-term experiment with one particular pesticide, but a systematic independent assessment of all pesticides is not available.

The IARC assesses existing evidence on potential carcinogenic effects from independent research, but that is a very slow process: In the last 16 years only five pesticides were evaluated and at the time this was done all of them had been on the market for several decades.

Endocrine disruption

In 2000, the European Commission published a screening of chemicals for their potential to disrupt the endocrine system (EC 2000). The list was later prioritized (EC 2004, EC 2007) but never

updated. In Regulation (EC) No 1107/2009 a preliminary identification of endocrine disruptors was published. For the assessment of effects of the endocrine system, the old list and the preliminary “definition” by Regulation (EC) No 1107/2009 are used. That is a rather limited approach, because pesticides entering the market after 2000 were not included in the early screening and the preliminary “definition” by Regulation (EC) No 1107/2009 has a narrow scope. However, validated data which would allow a better ranking of endocrine disrupting effects do not exist. The TEDX List of Potential Endocrine Disruptors¹¹ presents results from literature reviews and “should not be used as a method of ranking or prioritizing.”

Developmental Immuno- and Neurotoxicity

Developmental Immunotoxicity (DIT) and Developmental Neurotoxicity (DNT) - while recognized to be of high importance – are not covered by risk assessment required for authorization (Hessel et al. 2015, Grandjean 2013, EFSA 2013). There are no systematic data on these two effects, therefore the Blacklist cannot consider these for evaluation today. A better risk assessment and more data are urgently needed in these areas. Developmental neurotoxicity can cause very serious effects on brain development, including learning and behavior, and adverse effects on the developing immune system can lead to life-long health problems.

Aquatic toxicity

The data for the environmental toxicity are based on endpoints for acute toxicity for a limited number of species. These species might not be the most sensitive species. *Daphnia magna* for example, as a standard test species for aquatic toxicity, seems to be particularly insensitive against neonicotinoids, which show high toxicity to other aquatic invertebrates (Morissey et al. 2015).

Insect toxicity

The evaluation for the Blacklist is reduced to a few species (usually one predatory mite and one parasitoid). That is not representative for all other species. Prabhaker et al. (2007 & 2011) tested the acute toxicity of nine insecticides to four parasitoid species, and it seems toxicity is species and pesticide specific. The toxicity to the most sensitive species compared to the most insensitive species can vary by a factor of more than 20.000, and a pesticide with lower toxicity to three parasitoids can show very high toxicity to the fourth.

Pesticide preparations

While the active ingredient is usually the effective (and most toxic) compound in a pesticide product, adjuvants added to the tank or “inert¹²” ingredient can enhance toxicity and change environmental behavior. Bonmatin et al. (2015) showed that commercial formulations may contain “inerts” that increase the solubility of the active substance, and one research group consistently found commercial pesticides products to have a higher leaching potential than the actual active ingredient (ibid. see also Krogh et al. 2003).

Brühl et al. (2013) have recently shown that juvenile frogs oversprayed with a fungicide product at recommended label rates caused surprisingly high mortality rates. The commercially available product Headline (pyraclostrobin and 67% naphtha solvent) caused 100% mortality just after 1 hour

¹¹ <http://endocrinedisruption.org/endocrine-disruption/tedx-list-of-potential-endocrine-disruptors/overview>

¹² “Inert Ingredients” are for example: solvents, surfactants, and emulsifiers. They have a big variety of functions like preventing caking or foaming, extending product shelf-life, or allowing herbicides to penetrate plants to maintain and enhance the effect of the active ingredient.

at the label rate, the formulation with the lower (< 25%) naphtha content revealed 20% mortality at the label rate. Other products caused 40% mortality in only 10% of the label rate. Earlier investigations confirm the relatively high amphibian toxicity of certain strobilurin fungicides (Hooser et al. 2012; Belden et al. 2010). Both studies show the outstandingly high toxicity of the product “Headline“. Publicly available toxicity information for pesticide formulations is generally limited to some acute effects. Information about the inert ingredients in pesticide formulations is not publicly available due to corporate confidentiality. In the EU, only ingredients classified as dangerous substances according to Regulation (EC) No 1272/2008 have to be specified, e.g. in the Safety Data Sheet (SDS) of the formulation.

Co-formulants (adjuvants) of glyphosate, polyethoxylated tallow amines (POEA) are long known to be of high toxicity and Germany decided to withdraw authorization for such substances¹³.

Human chronic toxicity

Pesticide classification for human chronic toxicity is often retrospective. Epidemiological evidence for chronic effects of pesticides exists only for pesticides which are on the market for longer. That means pesticides which are not on the Blacklist are not automatically “harmless” – in many cases science has not yet focused on them.

Classification data delay

The process of classification and labeling by the European Chemical Agency (ECHA) seems to be particularly slow. More than 130 synthetic pesticides authorized for use in the EU are not classified according to Regulation (EC) No 1272/2008/EC¹⁴ (incl. amendments). Among those unclassified pesticides are some which are on the market for decades (terbuthylazine, oxyfluorfen, bromadiolone, metiram) and some newer ones which seem to pose severe risks for human health and/or the environment (thiacloprid, emamectin benzoate). Missing classifications can lead to an over- or underestimation in the scoring system, because a default score of five is applied.

Cumulative Effects

The assessment for the Blacklist focuses on the individual pesticide active ingredients. Cumulative effects of marketed products containing one or several active ingredients, inerts, co-formulants, and/or tank mixes which may contain even more chemicals are excluded. Pesticides and other chemicals commonly occur together in the human body as well as in the environment (e.g. Reuter & Neumeister 2015), but an evaluation of potential cumulative effects would require an exposure assessment, because it is impossible to evaluate each combination of each chemical.

13 BVL: http://www.bvl.bund.de/DE/04_Pflanzenschutzmittel/06_Fachmeldungen/2011/2011_12_05_Fa_streichung_zusatzstoffe.html

14 Regulation (EC) No. 1272 / 2008 on the classification, labelling and packaging of substances and mixtures.

07

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Annex 1:

Greenpeace Blacklist 2016

Greenpeace Blacklist 2016			Mammal toxicity						Environmental Toxicity, Bioaccumulation, Persistence							
	Active Ingredient	Score	Acute Tox.	Carcinogenicity	Repro. Tox.	Mutagenicity	AOEL /ADI	EDC	Algae	Daphnia/Fish	Birds	Bee	Beneficial	Bioaccumulation	Persistence	
Fumigants																
1	Aluminum phosphide									10		10				
2	Metam-Potassium			10												
3	Metam-sodium			10		10	10									
4	Phosphine	82,8														
5	Sulfuryl fluoride	77,5														
Fungicides																
6	Ametoctradin; BAS 650 F									10			10			
7	Amisulbrom									10					10	
8	Benthiavalicarb-isopropyl			10												
9	Bixafen									10				10	10	
10	Bordeaux mixture									10					10	
11	Boscalid	80,1														
12	Bupirimate	74,7														
13	Captan	77														
14	Carboxin						10									
15	Chlorothalonil			10		10				10						
16	Copper hydroxide								10	10					10	
17	Copper oxychloride												10		10	
18	Cyflufenamid	78,7														
19	Cyproconazole	82,4														
20	Cyprodinil	80,4														
21	Difenoconazole	80,7														
22	Dimoxystrobin						10	10		10					10	
23	Disodium phosphonate												10		10	
24	Dodine								10	10						
25	Epoxiconazole			10	10	10									10	
26	Famoxadone					10			10	10			10		10	
27	Fenbuconazole					10										
28	Fenpropidin								10				10			
29	Fenpropimorph					10										
30	Fluazinam					10				10					10	
31	Fludioxonil	77,6														

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Total # Pesticides: 209

Greenpeace Blacklist 2016

Greenpeace Blacklist 2016			Mammal toxicity						Environmental Toxicity, Bioaccumulation, Persistence						
	Active Ingredient	Score	Acute Tox.	Carcinogenicity	Repro. Tox.	Mutagenicity	AOEL /ADI	EDC	Algae	Daphnia/Fish	Birds	Bee	Beneficial	Bioaccumulation	Persistence
32	Fluopicolide	81,6													
33	Fluopyram	76,6													
34	Fluoxastrobin	74,7													
35	Fluquinconazole						10								10
36	Fluxapyroxad												10		10
37	Fuberidazole						10								
38	Imazalil			10											10
39	Ipconazole	74,4													
40	Iprodione			10											
41	Iprovalicarb			10											10
42	Isopyrazam			10						10					10
43	Kresoxim-methyl			10											
44	Mancozeb			10				10		10					
45	Maneb			10				10	10	10					
46	Mepanipyrim			10											
47	Meptyldinocap						10			10				10	
48	Metalaxyl	77,9													
49	Metiram			10				10							
50	Metrafenone													10	10
51	Myclobutanil	79,9													
52	Penconazole	84,9													
53	Pencycuron	73,6													
54	Picoxystrobin									10			10		
55	Prochloraz								10						10
56	Propiconazole												10		10
57	Propineb			10		10									
58	Proquinazid	78,2													
59	Pyraclostrobin									10				10	
60	Pyrimethanil	74,7													
61	Quinoxifen									10			10	10	10
62	Sedaxane			10											10
63	Spiroxamine								10				10		
64	Tebuconazole	78,9													

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Total # Pesticides: 209

Greenpeace Blacklist 2016

Greenpeace Blacklist 2016		Mammal toxicity							Environmental Toxicity, Bioaccumulation, Persistence						
		Active Ingredient	Score	Acute Tox.	Carcinogenicity	Repro. Tox.	Mutagenicity	AOEL /ADI	EDC	Algae	Daphnia/Fish	Birds	Bee	Beneficial	Bioaccumulation
65	Terrazole; Etridiazole			10										10	
66	Tetraconazole						10							10	10
67	Thiophanate-methyl			10											
68	Thiram							10		10					
69	Tolclofos-methyl		77,2												
70	Triadimenol		80,6												
71	Triazoxide						10			10					10
72	Trifloxystrobin								10	10			10		
73	Triflumizole												10	10	
74	Triticonazole												10		10
75	Ziram						10			10					
Herbicides															
76	2,4-DB							10							
77	Aclonifen													10	10
78	Amitrole*						10	10					10		10
79	Benfluralin						10			10			10	10	
80	Bifenox								10				10	10	
81	Bromoxynil		78,2												
82	Chlorotoluron							10							10
83	Cyhalofop-butyl						10						10		
84	Diclofop						10								
85	Diflufenican								10	10				10	10
86	Diquat dibromide						10						10		10
87	Diuron			10			10		10						
88	Ferrous sulfate									10				10	10
89	Flufenacet						10		10				10		10
90	Flumioxazin				10		10		10						
91	Fluometuron						10								10
92	Fluorochloridone								10						10
93	Foramsulfuron												10		10
94	Glufosinate-ammonium				10		10						10		
95	Glyphosate			10											
96	Haloxypop-R						10						10		

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* Authorization expired. Maximal period of grace: 30.09.2017

Total # Pesticides: 209

Greenpeace Blacklist 2016

Greenpeace Blacklist 2016		Mammal toxicity							Environmental Toxicity, Bioaccumulation, Persistence						
	Active Ingredient	Score	Acute Tox.	Carcinogenicity	Repro. Tox.	Mutagenicity	AOEL /ADI	EDC	Algae	Daphnia/Fish	Birds	Bee	Beneficial	Bioaccumulation	Persistence
97	Haloxypop-R-methyl						10			10			10		
98	Imazaquin												10		10
99	Isoproturon*	73,7													
100	Isoxaflutole			10											
101	Lenacil								10						10
102	Linuron				10		10	10					10		
103	Metazachlor	77,2													
104	Metobromuron						10								
105	Metribuzin							10							
106	Oryzalin			10											
107	Oxadiazon			10			10		10						10
108	Oxyfluorfen			10			10							10	
109	Pendimethalin								10				10	10	
110	Penoxsulam	74,7													
111	Picloram							10							10
112	Picolinafen								10					10	
113	Profoxydim						10	10							
114	Propaquizafop	75,7													
115	Propyzamide												10		10
116	Prosulfocarb						10							10	10
117	Prosulfuron								10						10
118	Pyraflufen-ethyl			10					10				10		
119	Quinoclamine						10			10		10			
120	Quizalofop-P-ethyl						10								
121	Quizalofop-p-tefuryl				10										
122	Sulcotrione						10								
123	Tembotrione						10						10		10
124	Terbuthylazine						10								
125	Topramezone						10								10
126	Tralkoxydim						10								10
127	Tri-allate								10	10				10	10
128	Triclopyr	74,6													

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* Authorization expired. Maximal period of grace: 30.09.2017

Total # Pesticides: 209

Greenpeace Blacklist 2016

Greenpeace Blacklist 2016		Mammal toxicity						Environmental Toxicity, Bioaccumulation, Persistence							
		Score	Acute Tox.	Carcinogenicity	Repro. Tox.	Mutagenicity	AOEL /ADI	EDC	Algae	Daphnia/Fish	Birds	Bee	Beneficial	Bioaccumulation	Persistence
Active Ingredient															
Insecticides; Acaricides															
129	Abamectin		10			10			10						
130	Acrinathrin					10			10	10		10	10		10
131	Beta-cyfluthrin					10			10			10	10		10
132	Bifenazate					10									
133	Bifenthrin					10	10		10			10	10		10 10
134	Buprofezin	86,6													
135	Chlorantraniliprole								10						10
136	Chlorpyrifos					10			10			10	10		10
137	Chlorpyrifos-methyl								10			10	10		10
138	Clofentezine								10						10
139	Clothianidin											10	10		10
140	Cyhalothrin, gamma					10			10			10	10		10
141	Cypermethrin								10			10	10		10
142	Cypermethrin, alpha								10			10	10		10
143	Cyromazine	73,6													
144	Deltamethrin					10	10		10			10	10		10
145	Diiflubenzuron								10				10		
146	Dimethoate					10						10	10		
147	Emamectin benzoate					10			10	10		10			10
148	Esfenvalerate								10	10		10	10		10
149	Ethoprophos		10	10		10					10		10		
150	Etofenprox								10			10	10		
151	Etoxazole								10						10
152	Fenamiphos					10			10	10		10	10		
153	Fenazaquin					10			10			10			10
154	Fenoxycarb		10												
155	Fenpyroximate					10			10				10		10
156	Fipronil					10						10	10		10
157	Flubendiamide					10			10						10
158	Flupyradifurone	74,2													
159	Formetanate					10			10			10	10		
160	Hexythiazox		10			10									10

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Total # Pesticides: 209

Greenpeace Blacklist 2016

Greenpeace Blacklist 2016		Mammal toxicity							Environmental Toxicity, Bioaccumulation, Persistence						
		Score	Acute Tox.	Carcinogenicity	Repro. Tox.	Mutagenicity	AOEL /ADI	EDC	Algae	Daphnia/Fish	Birds	Bee	Beneficial	Bioaccumulation	Persistence
161	Imidacloprid										10	10		10	
162	Indoxacarb					10					10	10		10	
163	Lambda-cyhalothrin					10	10		10		10	10		10 10	
164	Lufenuron								10					10 10	
165	Malathion		10						10		10	10			
166	Metaflumizone										10	10		10 10	
167	Methiocarb								10	10	10	10			
168	Methomyl					10			10		10	10			
169	Methoxyfenozide	75,1													
170	Milbemectin								10		10	10			
171	Paraffin oil (cont. >3% DMSO)		10												
172	Phosmet								10		10	10			
173	Pirimicarb		10						10					10	
174	Pirimiphos-methyl					10			10		10	10		10	
175	Pymetrozine		10												
176	Pyrethrum								10		10				
177	Pyridaben					10			10		10	10			
178	Pyridalyl								10					10 10	
179	Pyriproxyfen	73,8													
180	Spinetoram					10					10	10		10	
181	Spinosad										10	10			
182	Spirodiclofen		10			10			10			10			
183	Spiromesifen								10					10	
184	Sulfoxaflor										10	10			
185	Tau-fluvalinate					10			10			10		10	
186	Tebufenozide					10								10	
187	Tebufenpyrad								10			10		10	
188	Teflubenzuron								10			10		10 10	
189	Tefluthrin					10			10		10			10	
190	Thiacloprid		10									10			
191	Thiamethoxam										10	10			
192	Triflumuron								10					10	
193	zeta-Cypermethrin								10		10				

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Total # Pesticides: 209

Greenpeace Blacklist 2016

Greenpeace Blacklist 2016		Mammal toxicity						Environmental Toxicity, Bioaccumulation, Persistence							
		Score	Acute Tox.	Carcinogenicity	Repro. Tox.	Mutagenicity	AOEL /ADI	EDC	Algae	Daphnia/Fish	Birds	Bee	Beneficial	Bioaccumulation	Persistence
Nematicides															
194	Fosthiazate						10			10	10				
195	Oxamyl						10			10	10	10			
Plant Growth Regulators															
196	1-methylcyclopropene						10								
197	Aluminum sulfate						10								10
198	Chlorpropham												10		10
199	Clodinafop-propargyl						10						10		
200	Daminozide			10											
201	Flumetralin								10					10	10
202	Paclobutrazol	82,7													
203	Sodium 2-nitrophenoxide						10								
204	Sodium 4-nitrophenoxide						10								
205	Sodium 5-nitroguaiacolate						10								
206	Sodium silver thiosulfate						10								
Rodenticides															
207	Bromadiolone			10			10								10
208	Calcium phosphide	80,3													
209	Difenacoum						10			10				10	10

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Total # Pesticides: 209

Annex 2

The Pesticide Blacklist Scoring System

The scoring system translates classification and/or toxicological endpoints or certain chemical properties into a numerical score. The scoring is usually 1-2-5-8-10 and relates to the toxicity or the chemical properties/environmental behavior of the pesticides. A high score relates high toxicity or a critical classification or in the case of environmental fate to critical effects (mobility, persistence).

Without balanced weighting, the highest possible score for a pesticide active ingredient would be 168 points (16 parameters with the highest possible score of 10 plus one parameter with maximum score of 8). The lowest possible score would be 17. However, because the mammalian/human toxicity group includes one more criterion for evaluation (immunotoxicity), a factor of 1,16 was applied to the ecotoxicity to outweigh the imbalance between ecotoxicity and human toxicity. The highest possible score for a pesticide active ingredient is therefore 176 points.

Mammalian toxicity

Acute Toxicity Score

All Exp.	Oral		Inhalation			Score
GHS Acute Cat.	WHO*	LD50 (mg/kg bw)	Gases (ppm/V)	Vapours (mg/l)	Dusts and Mists (mg/l)	
1	Ia	≤ 5	$LD50 \leq 100$	$LD50 \leq 0,5$	$LD50 \leq 0,05$	10 BL
2	Ib	$5 < LD50 \leq 50$	$100 < LD50 \leq 500$	$0,5 < LD50 \leq 2$	$0,05 < LD50 \leq 0,5$	8
3	II	$50 < LD50 \leq 300$	$500 < LD50 \leq 2500$	$2 < LD50 \leq 10$	$0,5 < LD50 \leq 1$	5
4	III	$300 < LD50 \leq 2000$	$2500 < LD50 \leq 2000$	$10 < LD50 \leq 20$	$1 < LD50 \leq 5$	2
**	U	> 2000	> 2000	> 20	> 5	1
ACTIVE INGREDIENTS WITHOUT DATA						5
<p>* The WHO Classification includes dermal toxicity, if higher than oral toxicity.</p> <p>** Active ingredients evaluated by GHS Regulation (EC) No 1272/2008 and not classified in any acute toxicity category.</p> <p>The GHS Classification reflects three exposures: oral, dermal and inhalation. The highest toxicity across all pathways is used.</p> <p>GHS Classification supersedes WHO and other LD50 data.</p>						

References

EC (2008): Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labeling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006. Official Journal of the European Union L 353/1 and its amendments.

IPCS/WHO (2009): The WHO recommended classification of pesticides by hazard and guidelines to classification 2009, International Programme on Chemical Safety (IPCS) & World Health Organization (WHO), Geneva.

Carcinogenicity Classification and Scoring

GHS CLASSIFICATION	EPA CLASSIFICATION 2005	EPA CLASSIFICATION 1999 DRAFT	EPA CLASSIFICATION 1996	EPA CLASSIFICATION 1986	IARC CANCER CLASSIFICATION	SCORE
Known human carcinogens' (category 1a)	Carcinogenic to humans	Carcinogenic to humans	Known/likely	Human carcinogen	Group 1 The agent (mixture) is carcinogenic to humans.	10 BL
Presumed human carcinogens' (category 1b)	Likely to be carcinogenic to humans	Likely to be carcinogenic to humans		Group B – probable human carcinogen Group B1 is reserved for agents for which there is limited evidence of carcinogenicity from epidemiologic studies Group B2 is used for agents for which there is „sufficient: evidence from animal studies and for which there is “inadequate evidence“ or „no data“ from epidemiologic studies.	Group 2a The agent (mixture) is probably carcinogenic to humans.	10 BL
Suspected human carcinogens (category 2)	Suggestive evidence of carcinogenic potential	Suggestive evidence of carcinogenicity, but not sufficient to assess human carcinogenic potential		Group C – possible human carcinogen	Group 2b The agent (mixture) is possibly carcinogenic to humans.	8
	Inadequate information to assess carcinogenic potential	Data are inadequate for an assessment of human carcinogenic potential.	Cannot be determined	Group D – not classifiable as to human carcinogenicity	Group 3 The agent (mixture or exposure circumstance) is not classifiable as to its carcinogenicity to humans.	5

Active ingredients evaluated by ghs regulation 1272/2008/ec and not classified in any carcinogenicity category.	Not likely to be carcinogenic to humans.	Not likely to be carcinogenic to humans	Not likely	Group E – evidence of non-carcinogenicity for humans	Group 4 The agent (mixture) is probably not carcinogenic to humans.	1
ACTIVE INGREDIENTS WITHOUT DATA						5

References:

EC (2008): Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labeling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006. Official Journal of the European Union L 353/1 and its amendments.

IARC (2015): Agents reviewed by the IARC Monographs, Volumes 1– 112 (by CAS Numbers). International Agency for Research on Cancer (IARC). Last updated: 7.April 2015. Lyon, France.

US EPA (2006–2014): Chemicals Evaluated for Carcinogenic Potential. Science Information Management Branch, Health Effects Division Office of Pesticide Programs, U.S. Environmental Protection Agency (US EPA). April 26 2006; September 12 2007, September 24 2008; September 03 2009, November 2012, September 2013, October 2014.

US EPA (2015): Annual Cancer Report 2015. Chemicals Evaluated for Carcinogenic Potential. Office of Pesticide Programs, U.S. Environmental Protection Agency (US EPA).

Mutagenicity

GHS	Description	Score
Category 1A	The classification in Category 1A is based on positive evidence from human epidemiological studies. Substances to be regarded as if they induce heritable mutations in the germ cells of humans.	10 BL
Category 1B	The classification in Category 1B is based on: <ul style="list-style-type: none"> ▶ positive result(s) from in vivo heritable germ cell mutagenicity tests in mammals; or ▶ positive result(s) from in vivo somatic cell mutagenicity tests in mammals, in combination with some evidence that the substance has potential to cause mutations to germ cells. It is possible to derive this supporting evidence from mutagenicity/genotoxicity tests in germ cells in vivo, or by demonstrating the ability of the substance or its metabolite(s) to interact with the genetic material of germ cells; or ▶ positive results from tests showing mutagenic effects in the germ cells of humans, without demonstration of transmission to progeny; for example, an increase in the frequency of aneuploidy in sperm cells of exposed people. 	10 BL
Category 2	Substances which cause concern for humans owing to the possibility that they may induce heritable mutations in the germ cells of humans	8
	Active ingredients evaluated by GHS Regulation 1272/2008/EC and not classified in any mutagenicity category.	1
ACTIVE INGREDIENTS WITHOUT DATA		5

Reference:

EC (2008): Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labeling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006. Official Journal of the European Union L 353/1 and its amendments.

Reproductive and developmental toxicity

GHS	Description	Score
Category 1A	Known human reproductive toxicant The classification of a substance in Category 1A is largely based on evidence from humans	10 BL
Category 1B	Presumed human reproductive toxicant The classification of a substance in Category 1B is largely based on data from animal studies.	10 BL
Category 2	Suspected human reproductive toxicant Substances are classified in Category 2 for reproductive toxicity when there is some evidence from humans or experimental animals, possibly supplemented with other information.	8
	Active ingredients evaluated by GHS Regulation (EC) No 1272/2008 and not classified in any category for reproductive toxicity.	1
ACTIVE INGREDIENTS WITHOUT DATA		5

Reference:

EC (2008): Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labeling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006. Official Journal of the European Union L 353/1 and its amendments

Operator Toxicity AOEL/ADI (Acceptable Operator Exposure Level/Acceptable Daily Intake)

AOEL/ADI-Wert [mg/kg body weight]	Score
AOEL/ADI < 0,01	10 BL
0,01 ≤ AOEL/ADI < 0,1	8
0,1 ≤ AOEL/ADI < 1	5
1 ≤ AOEL/ADI < 10	2
AOEL/ADI ≥ 10 or "not appl." or "n.n."	1
ACTIVE INGREDIENTS WITHOUT DATA	5

References:

EC (2016) : EU Pesticides database. European Commission. <http://ec.europa.eu/food/plant/pesticides/eu-pesticides-database/public/?event=activesubstance.selection&language=EN>

EC (2015) EU Pesticides database. European Commission. <http://ec.europa.eu/food/plant/pesticides/eu-pesticides-database/public/?event=activesubstance.selection&language=EN>

Immunotoxicity

GHS	Score
H334: May cause allergy or asthma symptoms or breathing difficulties if inhaled. H317: May cause an allergic skin reaction.	8
Active ingredients evaluated by GHS Regulation (EC) No 1272/2008 and not classified as H317 or H343.	2
Active ingredients without data	5

Reference:

EC (2008): Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labeling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006. Official Journal of the European Union L 353/1 and its amendments.

Endocrine Disruption

EU Classification	Score
Endocrine disruptor or potential endocrine disruptor according to EU Category 1 ("At least one study showing endocrine disruption in an intact organism") or 'Suspected human reproductive toxicant' (Category 2) AND 'Suspected human carcinogens' (Category 2) according to Regulation (EC) No 1272/2008.	10 BL
Endocrine disruptor or potential endocrine disruptor according to EU Category 2 ("Potential for endocrine disruption")	8
EU Category 3 (No scientific basis for inclusion in list)	1
Active ingredients without data	5

References:

EC (2000): Towards the establishment of a priority list of substances for further evaluation of their role in endocrine disruption - preparation of a candidate list of substances as a basis for priority setting. European Commission. Delft.

EC (2004): Commission Staff Working Document SEC (2004) 1372 on implementation of the Community Strategy for Endocrine Disrupters - a range of substances suspected of interfering with the hormone systems of humans and wildlife (COM (1999) 706). Europäische Kommission. Brüssel.

EC (2007): Commission staff working document on the implementation of the „Community Strategy for Endocrine Disrupters“ - a range of substances suspected of interfering with the hormone systems of humans and wildlife (COM (1999) 706), (COM (2001) 262) and (SEC (2004) 1372), SEC(2007) 1635. European Commission (EC), Brussels, 30.11.2007.

EC (2008): Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labeling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006. Official Journal of the European Union L 353/1 and its amendments.

Environmental toxicity

Acute toxicity Algae

EC50 (growth) mg/l (ppm)	Footprint 'narrative'	Score
≤ 0,01	Highly toxic	10
> 0,01 - ≤ 10	Moderately toxic	5
>10	Low toxicity	1
ACTIVE INGREDIENTS WITHOUT DATA		5

References:

Lewis KA, Tzilivakis J, Warner D & Green A (2016): An international database for pesticide risk assessments and management. Human and Ecological Risk Assessment: An International Journal, In Press. doi:10.1080/10807039.2015.1133242.

University of Hertfordshire (2015): The Bio-Pesticides Database (BPDB) developed by the Agriculture & Environment Research Unit (AERU), University of Hertfordshire, 2011-2015.

University of Hertfordshire (2015): The Veterinary Substance Database (VSDB) developed by the Agriculture & Environment Research Unit (AERU), University of Hertfordshire, 2011-2015.

Acute toxicity Daphnia and Fish*

LC50 or EC50 (acute) mg/l (ppm)	US EPA 'narrative'	Score
≤ 0,1	very highly toxic	10
> 0,1 - ≤ 1	highly toxic	8
>1 - ≤ 10	moderately toxic	5
> 10 - ≤ 100	slightly toxic	2
> 100	practically nontoxic	1
ACTIVE INGREDIENTS WITHOUT DATA		5

*The highest score is applied, when scores differ between the two species groups.

References:

Lewis KA, Tzilivakis J, Warner D & Green A (2016): An international database for pesticide risk assessments and management. Human and Ecological Risk Assessment: An International Journal, In Press. doi:10.1080/10807039.2015.1133242.

University of Hertfordshire (2015): The Bio-Pesticides Database (BPDB) developed by the Agriculture & Environment Research Unit (AERU), University of Hertfordshire, 2011-2015.

University of Hertfordshire (2015): The Veterinary Substance Database (VSDB) developed by the Agriculture & Environment Research Unit (AERU), University of Hertfordshire, 2011-2015.

Acute toxicity birds

LD50 (oral)	US EPA 'narrative'	Score
≤ 10	very highly toxic	10
> 10 to ≤ 50	highly toxic	8
> 50 to ≤ 500	moderately toxic	5
> 500 to ≤ 2000	slightly toxic	2
> 2000	practically nontoxic	1
ACTIVE INGREDIENTS WITHOUT DATA		5

References:

Lewis KA, Tzilivakis J, Warner D & Green A (2016): An international database for pesticide risk assessments and management. Human and Ecological Risk Assessment: An International Journal, In Press. doi:10.1080/10807039.2015.1133242.

University of Hertfordshire (2015): The Bio-Pesticides Database (BPDB) developed by the Agriculture & Environment Research Unit (AERU), University of Hertfordshire, 2011-2015.

University of Hertfordshire (2015): The Veterinary Substance Database (VSDB) developed by the Agriculture & Environment Research Unit (AERU), University of Hertfordshire, 2011-2015

Beneficial organisms

Lethal Rate (50%) in gramm/hectar	Percent effect (mortality, beneficial capacity)	Footprint 'narrative'	Score
< 5	> 79	Harmful	10
> 5 to ≤ 40	-	-	8
> 40 to ≤ 110	30 - 79	Moderately harmful	5
> 110 to ≤ 500	-	-	2
> 500	< 30	Harmless	1
ACTIVE INGREDIENTS WITHOUT DATA			5
Data for most sensitive species are used for the TL			

References:

Lewis KA, Tzilivakis J, Warner D & Green A (2016): An international database for pesticide risk assessments and management. Human and Ecological Risk Assessment: An International Journal, In Press. doi:10.1080/10807039.2015.1133242.

University of Hertfordshire (2015): The Bio-Pesticides Database (BPDB) developed by the Agriculture & Environment Research Unit (AERU), University of Hertfordshire, 2011-2015.

University of Hertfordshire (2015): The Veterinary Substance Database (VSDB) developed by the Agriculture & Environment Research Unit (AERU), University of Hertfordshire, 2011-2015.

Honey bees (*Apis mellifera*)

LD50 (µg/bee)	US EPA 'narrative'	Score
< 2	Highly toxic	10
2 – 11	Moderately toxic	5
> 11	Practically nontoxic	1
ACTIVE INGREDIENTS WITHOUT DATA		5

References:

Lewis KA, Tzilivakis J, Warner D & Green A (2016): An international database for pesticide risk assessments and management. Human and Ecological Risk Assessment: An International Journal, In Press. doi:10.1080/10807039.2015.1133242.

University of Hertfordshire (2015): The Bio-Pesticides Database (BPDB) developed by the Agriculture & Environment Research Unit (AERU), University of Hertfordshire, 2011-2015.

University of Hertfordshire (2015): The Veterinary Substance Database (VSDB) developed by the Agriculture & Environment Research Unit (AERU), University of Hertfordshire, 2011-2015.

Environmental fate and transport

Bioaccumulation

Bioconcentration Factor (BCF)	LogP KOW	Score*
> 500	> 5	10
> 400 - ≤ 500	> 3 - ≤ 5	8
> 300 - ≤ 400	> 2 - ≤ 3	5
> 200 - ≤ 300	> 1 - ≤ 2	2
≤ 200	< 1	1
ACTIVE INGREDIENTS WITHOUT DATA		5
*Bioconcentration Factor (BCF) supersede Log P KOW data		

References:

Lewis KA, Tzilivakis J, Warner D & Green A (2016): An international database for pesticide risk assessments and management. Human and Ecological Risk Assessment: An International Journal, In Press. doi:10.1080/10807039.2015.1133242.

University of Hertfordshire (2015): The Bio-Pesticides Database (BPDB) developed by the Agriculture & Environment Research Unit (AERU), University of Hertfordshire, 2011-2013.

University of Hertfordshire (2015): The Veterinary Substance Database (VSDB) developed by the Agriculture & Environment Research Unit (AERU), University of Hertfordshire, 2011-2013.

Persistence in soil, sediments and water

Half-life soil and/or sediment (days)	Half-life in Water (days)	Score
> 90	> 50	10
> 80 ≤ 90	> 40 ≤ 50	8
> 70 ≤ 80	> 30 ≤ 40	5
> 60 ≤ 70	> 20 ≤ 30	2
> 50 ≤ 60	> 10 ≤ 20	1
≤ 50	≤ 10	1
Elements		1
ACTIVE INGREDIENTS WITHOUT DATA		5

References:

Lewis KA, Tzilivakis J, Warner D & Green A (2016): An international database for pesticide risk assessments and management. Human and Ecological Risk Assessment: An International Journal, In Press. doi:10.1080/10807039.2015.1133242.

University of Hertfordshire (2015): The Bio-Pesticides Database (BPDB) developed by the Agriculture & Environment Research Unit (AERU), University of Hertfordshire, 2011-2015.

University of Hertfordshire (2015): The Veterinary Substance Database (VSDB) developed by the Agriculture & Environment Research Unit (AERU), University of Hertfordshire, 2011-2015.

Leaching potential

GUS Index (function of soil half-life and soil binding)	Footprint 'narrative'	Score
> 2,8	High leachability	10
2,8 – 1,8	Transition state	5
< 1,8	Low leachability	1
ACTIVE INGREDIENTS WITHOUT DATA		5

Primary References:

Lewis KA, Tzilivakis J, Warner D & Green A (2016): An international database for pesticide risk assessments and management. Human and Ecological Risk Assessment: An International Journal, In Press. doi:10.1080/10807039.2015.1133242.

University of Hertfordshire (2015): The Bio-Pesticides Database (BPDB) developed by the Agriculture & Environment Research Unit (AERU), University of Hertfordshire, 2011-2015.

University of Hertfordshire (2015): The Veterinary Substance Database (VSDB) developed by the Agriculture & Environment Research Unit (AERU), University of Hertfordshire, 2011-2015.

Secondary reference (when data are not available in Primary Reference):

CDPR (2015): 2014 Status Report Pesticide Contamination Prevention Act. California Environmental Protection Agency.- California Department of Pesticide Regulation. Environmental Monitoring Branch.

Volatility

Vapour pressure (mm HG) at 20-25°C	Score
> 0,01	10
< 0,01 to > 0,0001	5
< 1×10^{-4} - > 1×10^{-6}	5
< 1×10^{-6} - > 1×10^{-8}	2
< 1×10^{-8}	1
ACTIVE INGREDIENTS WITHOUT DATA	5

References:

Lewis KA, Tzilivakis J, Warner D & Green A (2016): An international database for pesticide risk assessments and management. Human and Ecological Risk Assessment: An International Journal, In Press. doi:10.1080/10807039.2015.1133242.

University of Hertfordshire (2015): The Bio-Pesticides Database (BPDB) developed by the Agriculture & Environment Research Unit (AERU), University of Hertfordshire, 2011-2013.

University of Hertfordshire (2015): The Veterinary Substance Database (VSDB) developed by the Agriculture & Environment Research Unit (AERU), University of Hertfordshire, 2011-2013.

Half-life on plants

Half-life on plant (days)	Score
> 3,8	10
> 1 – < 3,8 (or post-emergency herbicide)	5
< 1 (or pre-emergency herbicide)	1
ACTIVE INGREDIENTS WITHOUT DATA	5

Primary Reference:

Fantke P & Juraske R (2013): Variability of Pesticide Dissipation Half-Lives in Plants. Environ. Sci. Technol. (47): 3548–3562. dx.doi.org/10.1021/es303525x

Secondary Reference (when data are not available in Primary Reference):

Lewis KA, Tzilivakis J, Warner D & Green A (2016): An international database for pesticide risk assessments and management. Human and Ecological Risk Assessment: An International Journal, In Press. doi:10.1080/10807039.2015.1133242.

Scoring for “low risk” compounds

EU Commission Regulation (EC) No 1095/2007 (4) as well as Annex II of Regulation (EC) No 1107/2009 define criteria for “low-risk active substances”. Pesticides which were authorized in the EU because they meet these criteria receive a default total score of 17 in the Blacklist Scoring System – the lowest possible total score. The score cannot be lower, because even a low-risk substance may present some potential risk.

Annex 3

Comparison of toxicological thresholds for specific effects with the ADI as used for the Blacklist

Database

NOEL (“*No Observed Effect Level*”) values for repeated dosing for selected effects on the nervous system and the thyroid collated by EFSA in the framework of the “cumulative risk assessment”. The goal of that assessment was to identify pesticides with common toxicological mechanisms, and presents a review of all data from the authorization process regarding specific endpoints and specific target organisms.

All data are available at: <http://www.efsa.europa.eu/en/efsajournal/pub/3293>

Pesticides active ingredients (a.i.) were investigated with the following results:

- ▶ 84 a.i. with effects on nervous system (517 studies delivered NOELs, repeated dose)
- ▶ 110 a.i. with effect on thyroid (745 studies delivered NOELs, repeated dose)

Important note:

NOEL (“*No Observed Effect Level*”) values are normally more protective than NOAEL (“*No Observed **Adverse** Effect Level*”) values. ADI values are commonly derived by dividing NOAEL values by two uncertainty factors 10 and 10 (=100).

Methods

Comparison of the EFSA NOELs for specific effects with the ADI as used for the Blacklist. The EFSA NOELs (repeated dose) were divided by 100 to create values (“NOEL-ADIs”) comparable with the ADIs.

For comparison, the Blacklist scoring system for the ADI (refer to Annex 2, table AOEL/ADI) was applied to the NOEL-ADIs, and then divided by the scores for the ADIs used for the Blacklist. Results greater than 1 would mean that the ADI used for the Blacklist is weaker than the NOEL-ADI. Results smaller than 1 would mean that the Blacklist ADIs are stricter than the “NOEL-ADI” so they would be more protective for the effects under scope.

Results

In 98% of all studies analyzed by EFSA the blacklist score is equal (66%) or stricter (32%) than the score for the NOEL-ADI. For 2% of the studies, the NOEL-ADI results in a stricter score than the blacklist ADI which concerns 10 pesticides. The reason for this is that for these 10 pesticides very different results for the NOEL values were found by EFSA (between 5 and 35).

For Buprofezin for example, 15 NOELs were found, they range from 0.9 mg/kg bw per day to 1000 mg/kg bw per day for the same target organ. Since EFSA reviewed all available data for the focus of the project, the cumulative risk assessment, also studies were considered which would not be part of standard risk assessment, e.g. studies with humans. For that reason, the stricter NOEL-ADIs for 10 pesticides found by EFSA are not used for the Blacklist.

Conclusion

The ADIs used as Blacklist Criteria seem to be strict enough for covering effects on the nervous system concerning selected repeated dose effects derived from EU Draft Assessment Reports (DARs).

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