



**Pesticide  
Action  
Network**  
Europe

Dietary exposure to  
pesticides:  
Changes needed for  
consumer's safety

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EFSA- Revisiting the IESTI equations; Geneva, Sep 7<sup>th</sup> 2015

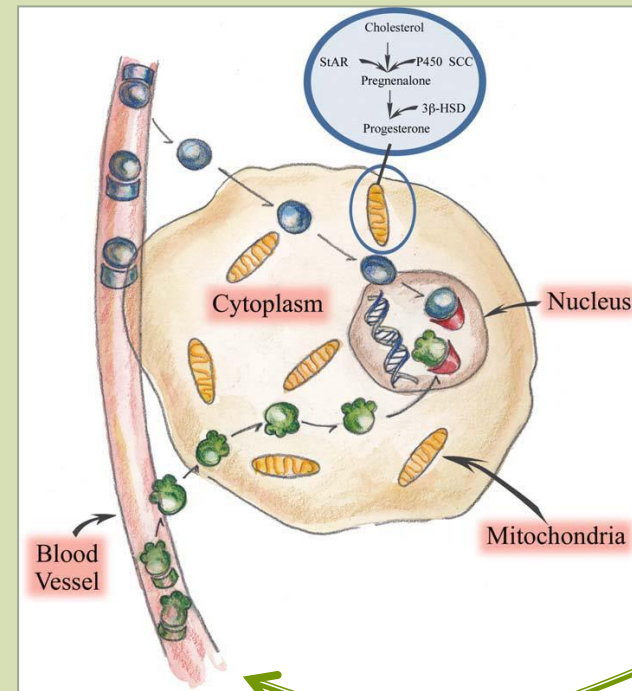
# Pesticides



Deliberately made to be toxic to living organisms

- Cellular sites in target species similar to humans and other animals

Pesticides are toxic to non-target species and humans



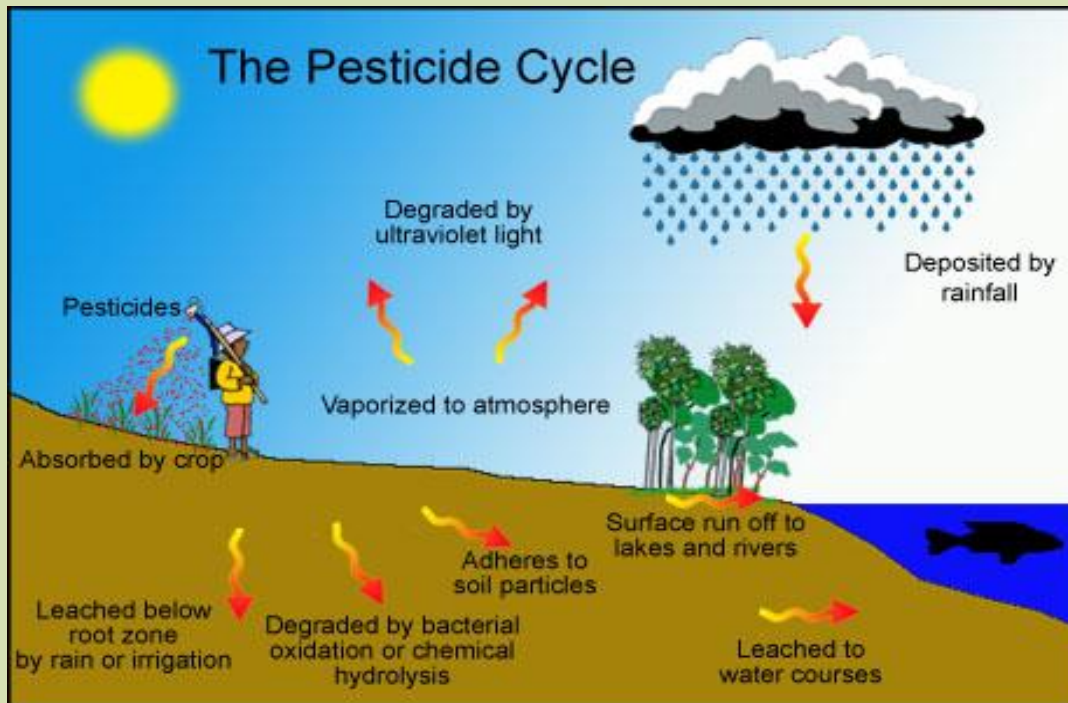
+ Low solubility → Contamination of ecosystems



# Pesticides

Detected in: biota, soil, sediments, water systems, human tissues and blood, including newborns.

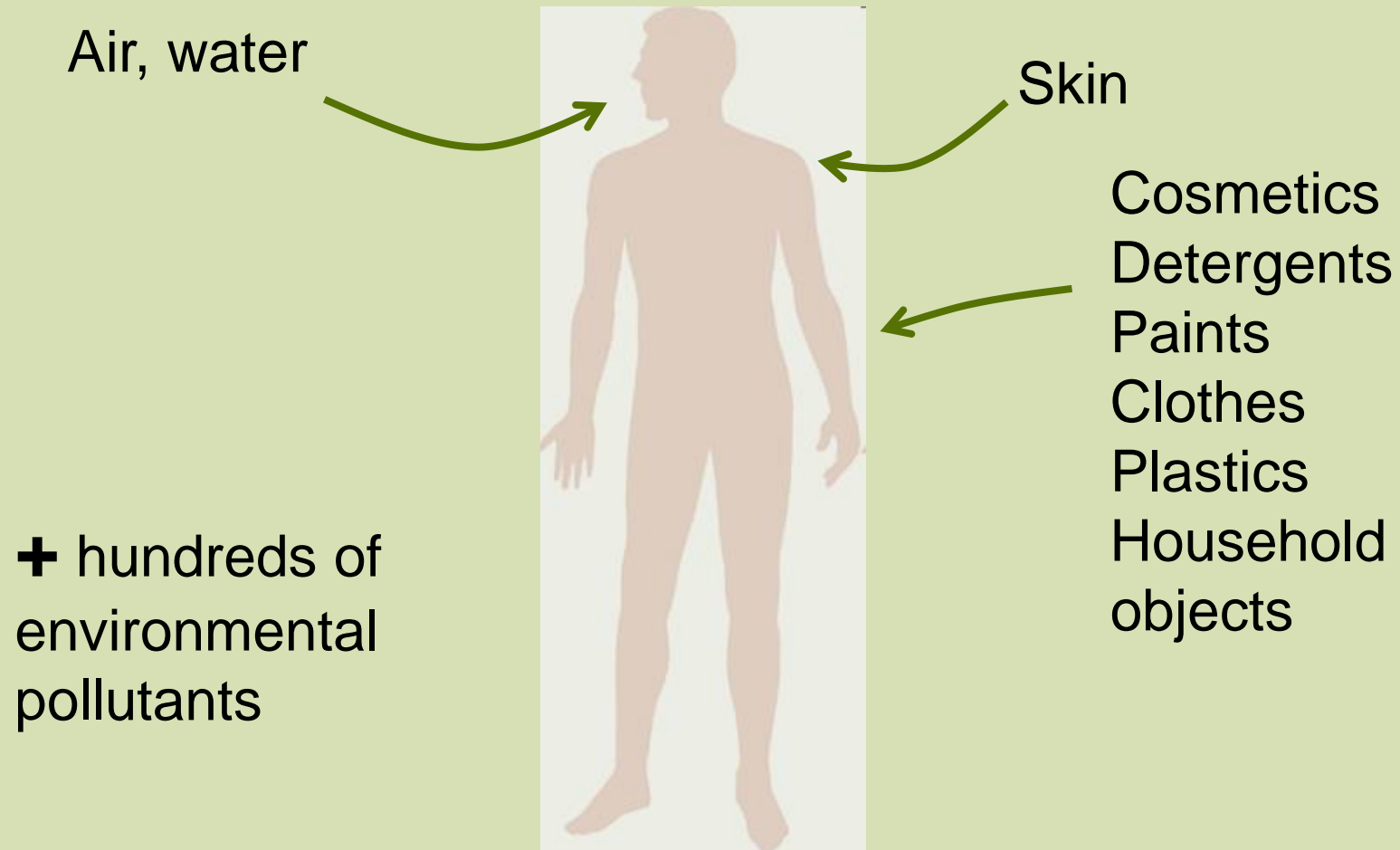
EU sales: 300,000,000 kg/year



# Pesticides



Diet is not the only route of exposure





## Protection of human health

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PPPR (EC) 1107/2009, Article 4 (3b):

**“it shall have no immediate or delayed harmful effect on human health**, including that of vulnerable groups, or animal health, directly or through drinking water (taking into account substances resulting from water treatment), food, feed or air, or consequences in the workplace or through other indirect effects, **taking into account known cumulative and synergistic effects** where the scientific methods accepted by the Authority to assess such effects are available; or on groundwater”

## Concerns

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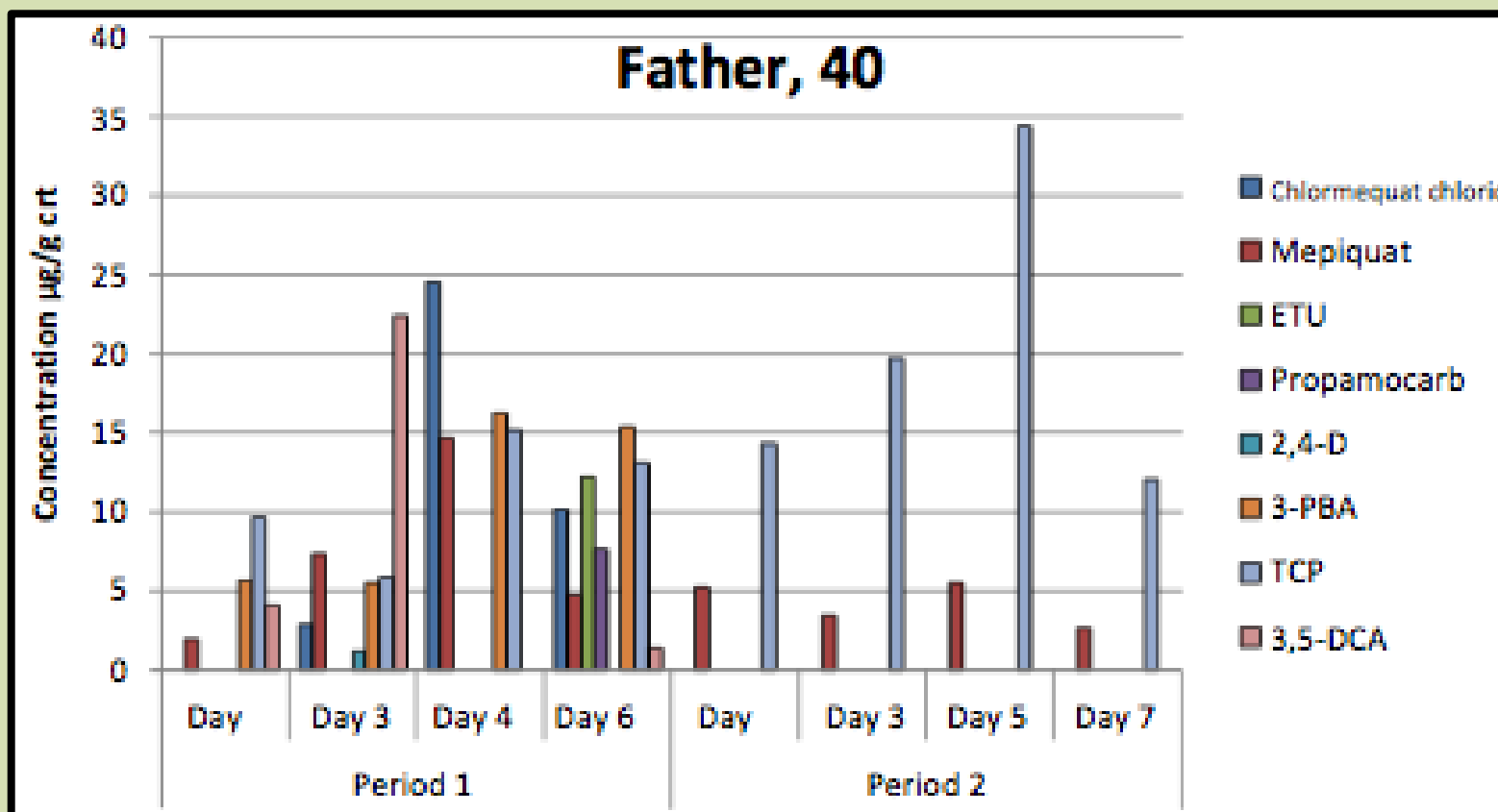


- Correlation of pesticides in urine with high vegetable and fruit consumption (IVL, 2015).



## Concerns

- Correlation of pesticides in urine with high vegetable and fruit consumption (IVL, 2015).





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- | Pesticide            | Period 1 Day 1 | Period 1 Day 3 | Period 1 Day 4 | Period 1 Day 6 | Period 2 Day 1 | Period 2 Day 3 | Period 2 Day 5 | Period 2 Day 7 |
|----------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
| Chlormequat chloride | 630            | 680            | 250            | 660            | 0              | 0              | 0              | 0              |
| Mepiquat             | 30             | 90             | 30             | 80             | 0              | 0              | 0              | 0              |
| ETU                  | 0              | 0              | 0              | 0              | 0              | 0              | 0              | 0              |
| Propamocarb          | 0              | 0              | 0              | 0              | 0              | 0              | 0              | 0              |
| 2,4-D                | 0              | 0              | 0              | 0              | 0              | 0              | 0              | 0              |
| 3-PBA                | 10             | 50             | 60             | 50             | 0              | 0              | 0              | 0              |
| TCP                  | 20             | 80             | 110            | 20             | 0              | 0              | 0              | 0              |
| 3,5-DCA              | 10             | 10             | 20             | 40             | 0              | 0              | 0              | 0              |



# Concerns

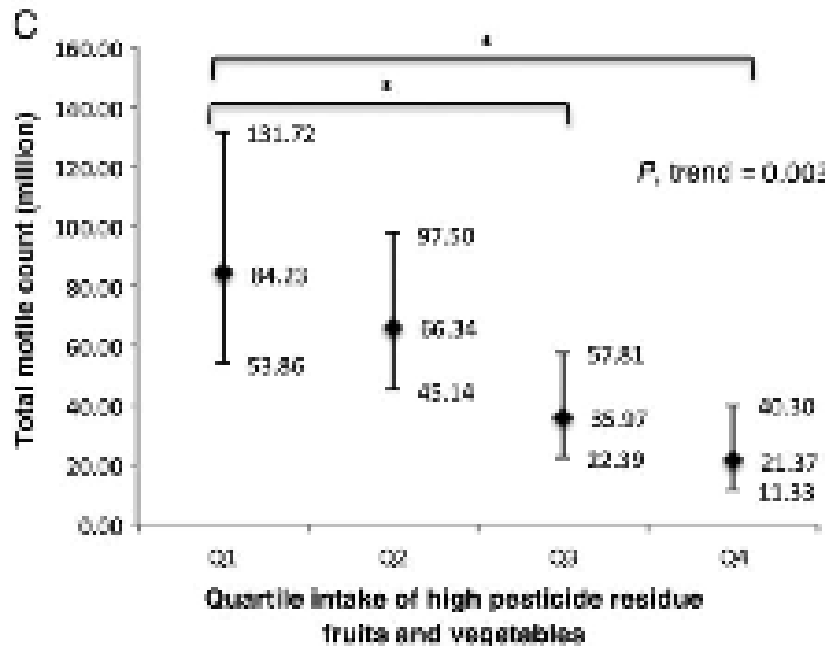
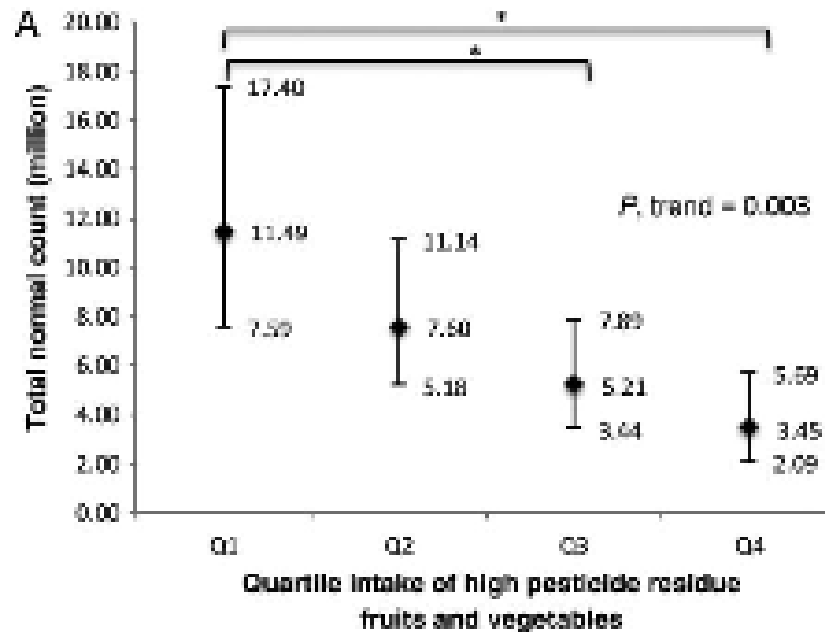
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- Correlation of pesticides in urine with high vegetable and fruit consumption (IVL, 2015).
- Some pesticides are endocrine disruptors, they act at very low, environmental levels –  
e.g. pesticide exposure and sperm quality  
(Chiu et al., 2015)

## Concern

- Correlation between fruit and vegetable intake and pesticide exposure
- Some people eat very low quality produce



with vegetable

intake, they act at

quality

# Concerns

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- Correlation of pesticides in urine with high vegetable and fruit consumption (IVL, 2015).
- Some pesticides are endocrine disruptors, they act at very low, environmental levels –

e.g. pesticide exposure and sperm quality  
(Chiu et al., 2015)

- Very low concentrations are not tested in RA
  - Vulnerable population: unborn, pregnant women, babies
  - Diseases manifest later in life
  - Cumulative effects
- RA must adapt to the latest scientific findings
    - New test methods and endpoints

# Assessment of human dietary toxicity



Laboratory breed  
(less responsive?)

Dietary exposure to a  
single chemical

**Highly unrealistic!**

# Guidance Values



■ Safety/Uncertainty factors → x100 **Non-** conservative

■ NOAEL/BMD

■ ADI

■ TDI

■ ARfD



Single compound  
exposure



IESTI



MRL ✓

■ Commodities > 1 pesticide → Strawberries, apples  
pears may contain up  
to 15 pesticides....

■ Other pollutants?

■ Sensitive groups? Elders,  
unborn, people with sickness? → Delayed endocrine  
related diseases?

# Guidance Values



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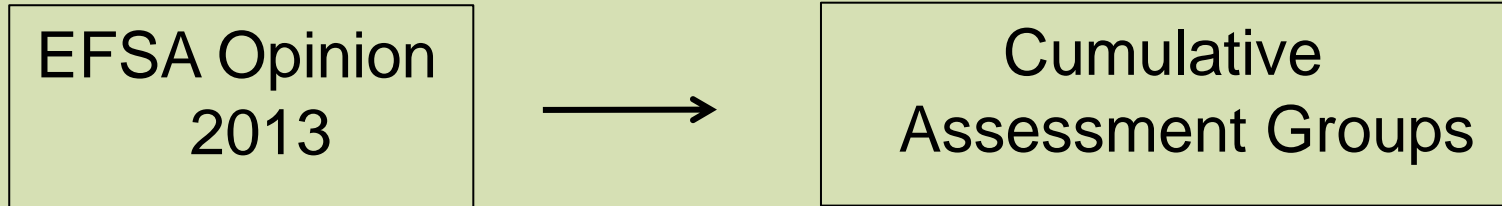
■ Sensitive groups? Elders,  
unborn, people with sickness?

Over  
conservative?!

Great  
uncertainties!

# Cumulative Risk Assessment

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- Based on shared toxicological profiles and common adverse effects
- Effects on individual organs and organ systems (e.g. thyroid and nervous system)
- Powerful tool for establishment of new MRL
- Vital priority in RA



# IESTI

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## Higher level of protection by:

- HR replaced by MRL in IESTI equations (paragraph 2.1)
  - Prevent  $IESTI \geq ARfD$
  - Prevent MRLs that allow ARfD levels in food
- Variability factor (paragraph 2.2)
  - $V=7$  in all commodities, in trials exceeded only in 1% (EFSA, 2005)
- Conversion factors (paragraph 2.3)
  - $IESTI \rightarrow$  dietary intake (surrogate-MRL)
  - Real monitoring data are needed





# IESTI

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## Higher level of protection by:

- Harmonised LP? (paragraph 2.4)
  - National LPs, when necessary use the highest portion consumed/most critical (i.e. EU)
  - Separate LPs for raw/processed commodities



# IESTI

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## Higher level of protection by:

- LoP 100% not 90% or 99% (Chapter 3)
  - $IESTI < ARfD \rightarrow HR \text{ or } STMR = MRL \text{ and } V=7$
  - $LoP > 99.99\% \rightarrow$  Conservative? **✓ Good**
- MRLs based on commodity as market product
- Food inspection (chapter 4)
  - LP according to market target population
  - HR can be replaced by the actual residue levels
  - Harmonisation only if highest value is used
  - EFSA responsible for EU



# Threats

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- Assuming that IESTI is over-conservative
- Global extrapolation → undermine regional habits
- Extrapolation at population level → undermine the weak, vulnerable
- Regional monitoring is essential
- Not adopting the “worst case scenario”
- IESTI not based on cumulative risk assessment

## Final remarks

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- Priority in the EU is to protect human and environmental health
- IESTI being over conservative is a myth
- EU must adapt to a CRA of pesticides
- IESTI must be modified according to CRA
- EU must move towards a low-pesticide and sustainable agriculture, and towards a toxic-free future



*Thank you!*