



International POPs Elimination Network

We are writing to you on the subject of the insecticide endosulfan and the Stockholm Convention on Persistent Organic Pollutants (POPs).

As you may be aware, endosulfan is poised to enter the process for consideration as a Persistent Organic Pollutant at the 4th Meeting of the POPs Reviews Committee in Geneva, in October this year. The Committee will consider the proposal by the European Union that endosulfan meets the screening criteria for a POP as outlined in Annex D of the Stockholm Convention.

It is also the view of the International POPs Elimination Network and PAN International that endosulfan meets the screening criteria and should be permitted to enter the process for consideration. Please refer to the attached summary from PAN International, which addresses the scientific evidence for each of the screening criteria.

We are therefore writing to seek your support for acceptance of endosulfan into the POPs review process. This will result in the rigorous assessment of endosulfan by the POPs Review Committee in the process set out in Annex E of the convention.

We are taking this action because of our experience with a number of communities and our understanding of the peer-reviewed scientific literature. We are greatly concerned about the actual effects endosulfan is having on human health and the environment. Serious poisonings have occurred in Africa, India, and Latin America, and environmental contamination is widespread and persistent. Its broad-spectrum impacts are affecting beneficial insects, and endosulfan is highly toxic to aquatic life, birds, mammals and beneficial soil microorganisms.

In West Africa, many hundreds of cotton farmers have died as a result of occupational exposure to endosulfan, and many others as a result of non-occupational exposure including through food contamination. For example, over the years 2000-20003, endosulfan caused 400 poisonings in Benin, of which 347 were fatal, accounting for 69% of all pesticide poisonings in that country. Surveys in cotton growing regions of Senegal, carried out by PAN Africa in 2003-2004 identified endosulfan as the cause of up to 40% of cases (Glin et al 2006). The West African countries have subsequently banned endosulfan.

In the Kasargod region of Kerala, south India, 20 years aerial spraying of cashew nut plantations with endosulfan left a legacy of disease, death and deformity amongst neighbouring villagers. Numerous congenital, reproductive and long term neurological

and other effects were experienced, including congenital deformities, cerebral palsy, epilepsy, lowered IQ, delayed and deficient mental development, delayed male sexual development, cancer, loss of vision, ear nose and throat problems. A survey by the Kasargod District Committee found a disability rate 73% higher than the norm for Kerala State, and the rate of locomotor disability and mental retardation taken together was 107% higher than the norm (Quijano 2002; NIOH 2003). Endosulfan has subsequently been banned in the State of Kerala and a massive effort, by the Kerala State Government, is now underway to provide treatment for the victims. Approximately 2000 are registered. Compensation has been paid to some of the victims and/or their families by the State, including the families of at least 135 victims who have died (Venugopal 2008).

We are aware that some countries are concerned they cannot manage their agriculture without endosulfan, although the number of countries still using it is decreasing. At least 55 countries have found effective alternatives and banned endosulfan: Austria, Bahrain, Belgium, Belize, Benin, Bulgaria, Burkina Faso, Cambodia, Cap-Vert, Colombia, Cote d'Ivoire, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Gambia, Germany, Greece, Guinea Bissau, Hungary, Ireland, Italy, Jordan, Kuwait, Latvia, Lithuania, Luxembourg, Malaysia, Mali, Malta, Mauritania, Netherlands, Niger, Nigeria, Norway, Oman, Poland, Portugal, Qatar, Romania, Saudi Arabia, Senegal, Singapore, Slovakia, Slovenia, Spain, Sri Lanka, St Lucia, Sweden, Syria, Tchad, the United Arab Emirates, United Kingdom.

The extent to which endosulfan is still needed or can be replaced by less harmful alternatives can only be thoroughly assessed as part of the POP Review Committee process. Annex F of the Stockholm Convention provides for a rigorous assessment of socio-economic aspects of endosulfan use, and if the Committee finds that there is an imperative to use endosulfan, then it may not progress it for inclusion the Convention, or else provides for exemptions for continued use.

We therefore believe it is very important that endosulfan is permitted to be properly assessed by the scientific expertise of the POPs Review Committee, and urge you to support this process.

Yours sincerely

INTERNATIONAL POPS ELIMINATION NETWORK (IPEN):

Dr Mariann Lloyd-Smith PhD (Law)

CoChair, International POPs Elimination Network

Senior Advisor, National Toxics Network Inc.

PO Box 173 Bangalow NSW 2479, Australia

(612) 66815340 / 0413 621557

biomap@oztoxics.org

<http://www.ntn.org.au>

PESTICIDE ACTION NETWORK (PAN) INTERNATIONAL

<http://www...pan-international.org/panint/?q=node/33>

comprising:

Pesticide Action Network Africa (PAN Africa)

Regional Coordinator: **Abou Thiam**

BP: 15938 Dakar-Fann

Dakar, Senegal

Phone: (221) 825 49 14

Fax: (221) 825 14 43

panafrica@pan-afrique.org

<http://www.pan-afrique.org>

Pesticide Action Network Asia & The Pacific (PAN AP)

Regional Coordinator: **Sarojeni V Rengam**

P.O. Box 1170, 10850 Penang, Malaysia

Tel: 604-657 0271 or 604-656 0381

Fax: 604-6583960

panap@panap.net

<http://www.panap.net>

Pesticide Action Network Europe (PAN EU)

Regional Coordinator: **Carina Weber**

Nernstweg 32, D-22765 Hamburg, Germany

Phone: +49-40-39.91.910-0

Fax: +49-40-390.75.20

info@pan-germany.org

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

Red de Acción en Plaguicidas y sus Alternativas de América Latina (RAP-AL)

Regional Coordinator: **Javier Souza**

Centro de Estudios sobre Tecnologías Apropriadas de la Argentina

Rivadavia 4097, P.O. Box 89 (1727), Marcos Paz, Buenos Aires

Telefax: (54220) 4772171

javierrapal@yahoo.com.ar

<http://www.rap-al.org/>

Pesticide Action Network North America (PANNA)

Regional Coordinator: **Kathryn Gilje**

49 Powell St., Suite 500

San Francisco, CA 94102, USA

Phone: (415) 981-1771 (country code 1)

Fax : (415) 981-1991 (country code 1)

panna@panna.org

<http://www.panna.org>