

446.63
(Pesticides)

European Communities

EUROPEAN PARLIAMENT

Working Documents

1975-1976

7 April 1975

DOCUMENT 16/75

LIBRARY

Report

drawn up on behalf of the Committee on Public Health and the Environment

on the proposal from the Commission of the European Communities to the
Council (Doc. 460/74) for a directive on the approximation of the laws of
Member States relating to the classification, packaging and labelling of pesticides

Rapporteur: Mr. L. DELLA BRIOTTA

PE 40.179/fin.

By letter of 20 January 1975, the President of the Council of the European Communities consulted the European Parliament, pursuant to Article 100 of the EEC Treaty, on the proposal from the Commission of the European Communities for a directive on the approximation of the laws, regulations and administrative provisions of Member States relating to the classification, packaging and labelling of pesticides.

On 5 February 1975 the European Parliament referred this proposal to the Committee on Public Health and the Environment as the committee responsible and to the Legal Affairs Committee and the Committee on Economic and Monetary Affairs for their opinions.

The Committee on Public Health and the Environment appointed Mr Della Briotta rapporteur on 4 February 1975.

It considered the proposal at its meeting of 4 February 1975 and at its meeting of 20 March 1975 adopted the motion for a resolution and explanatory statement unanimously with one abstention.

The following were present: Mr Della Briotta, chairman and rapporteur; Mr D'Angelosante, Mr Van der Gun, Mr Martens, Mr Willy Müller, Mr Noë, Mrs Orth, Mr Premoli, Mr Rosati and Mr Springorum.

The opinions of the Legal Affairs Committee and of the Committee on Economic and Monetary Affairs are attached to this report.

C O N T E N T S

	<u>Page</u>
A. MOTION FOR A RESOLUTION	5
Proposal for a directive	7
B. EXPLANATORY STATEMENT	10
General observations	10
Consideration of the proposal for a directive	13
Conclusions	18
Opinion of the Legal Affairs Committee	19
Opinion of the Committee on Economic and Monetary Affairs	21

The Committee on Public Health and the Environment hereby submits to the European Parliament the following motion for a resolution, together with explanatory statement:

MOTION FOR A RESOLUTION

embodying the opinion of the European Parliament on the proposal from the Commission of the European Communities to the Council for a directive on the approximation of the laws, regulations and administrative provisions of Member States relating to the classification, packaging and labelling of pesticides

The European Parliament,

- having regard to the proposal from the Commission of the European Communities to the Council¹;
 - having been consulted by the Council pursuant to Article 100 of the EEC Treaty (Doc. 460/74);
 - having regard to the report of the Committee on Public Health and the Environment and the opinions of the Legal Affairs Committee and the Committee on Economic and Monetary Affairs (Doc. 16/75);
1. Approves the directive with the following proposed amendments and observations;
 2. Invites the Commission to submit as soon as possible further proposals designed to control the use and distribution of pesticides as a natural follow-up to the proposal for a directive under consideration;
 3. Welcomes the fact that this directive, like all others closely related to public health and the environment, has been drawn up by the Commission with a view to total harmonization;
 4. Requests the Commission to keep constantly up to date the list of toxic and harmful substances used in the manufacture of pesticides as well as the list of pure pesticides;
 5. Urges that packaging for pesticides should bear a legible and indelible warning against further use, and indicate a possible specific or general antidote;

¹OJ No. C 40 of 20 February 1975, p. 30

6. Stresses also the need for labels on dangerous preparations to be in the national language or languages of the importing country, with particular reference to the need to exercise caution;
7. Considers it essential that labelling on pesticides should be required to give indications of their toxicity or harmfulness to bees, fish and game that form part of agricultural production as well as insectivorous birds which play so useful a role in preserving the ecological balance of the natural environment;
8. Invites the Commission, pursuant to Article 149, second paragraph of the EEC Treaty, to adopt the following amendments.

Council directive on the approximation of the laws, regulations and administrative provisions of Member States relating to the classification, packaging and labelling of pesticides

Preamble and recital unchanged

Articles 1 to 4 unchanged

Article 5

Article 5

The Member States shall take all necessary measures to ensure that pesticides cannot be placed on the market unless their packaging satisfies the following requirements:

(a)

unchanged

(b)

unchanged

(c)

unchanged

(d) packagings must contain a legible and indelible warning against re-use.

Packages meeting these requirements shall be regarded as satisfactory.

unchanged

Article 6

Article 6

1.

unchanged

2.

unchanged

(a)

unchanged

(b)

unchanged

(c)

unchanged

(d)

unchanged

(e)

unchanged

(f)

unchanged

(g)

unchanged

¹For full text see OJ No. C 40 of 20 February 1975

(h) indication of a specific
or general antidote.

3.

unchanged

4. The safety advice must accompany the package when it is not physically possible to affix it to the label or to the package itself. In the case of pesticides subject to authorization, this safety advice shall be selected by the competent authority, and in other cases by the manufacturer or other person placing the preparation on the market. Safety advice must correspond with the indications given in Annex IV to the Directive of 27 June 1967 and in Annex V to this Directive.

5.

6. In no case may wording on the label on pesticides to which this Directive applies bear such indications as 'non-toxic' or 'harmless'.

However, labels may state that the preparation is harmless to bees or to any other specified organism (e.g. some pests, fish, game, etc.), provided that such indications refer to the normal use of the pesticide.

4. The safety advice, in the language or languages of the importing country, must accompany the package when it is not physically possible to affix it to the label or to the package itself. In the case of pesticide subject to authorization, this safety advice shall be selected by the competent authority, and in other cases by the manufacturer or other person placing the preparation on the market. Safety advice must correspond with the indications given in Annex IV to the directive of 27 June 1967 and in Annex V to this Directive.

unchanged

unchanged

However, labels must state that the preparation is harmless to bees or to any other specified organism (e.g. some pests, fish, game, insectivorous birds or other protected species, etc.), provided that such indications refer to the normal use of the pesticide.

Special cautionary indications, such as 'toxic to domestic animals, etc. ...' are required, if the directions for use of the preparation or the manner in which it is put up would involve a serious health hazard for the species concerned.

unchanged

Article 7

- 1.
- 2.
- 3.
4. Member States may make the placing on the market of dangerous preparations in their territories subject to the requirement that such preparations be labelled in their national language or languages.
- 5.

- unchanged
- unchanged
- unchanged
4. Member States must make the placing on the market of dangerous preparations in their territories subject to the requirement that such preparations be labelled in their national language or languages.
- unchanged

Articles 8-13 unchanged

EXPLANATORY STATEMENTGENERAL OBSERVATIONS

1. On 27 June 1967 the Council adopted General Directive No. 67/548 on the approximation of laws, regulations and administrative provisions of Member States relating to the classification, packaging and labelling of dangerous substances (see OJ No. 196 of 16 August 1967).

This directive was considerably amended before it finally came into force almost five years later on 1 January 1972.

That outline directive also included a number of annexes indicating respectively:

- Annex I: a list of dangerous substances classified on the basis of the atomic number of the most characteristic element in their makeup;
- Annex II: danger symbols;
- Annex III: nature of the specific risks attaching to the dangerous substances;
- Annex IV: safety advice concerning dangerous chemical substances;
- Annex V: devices and methods for determining the flashpoint of liquid substances and preparations.

The directive now being submitted to the committee on Public Health and the Environment for its consideration deals with rules for the sale of preparations containing one or more substances dangerous to human life, namely pesticides, and is based on and refers in part to the abovementioned outline directive.

Its content was specifically considered both in the Council Resolution of 28 May 1969 on a programme for the removal of technical barriers to trade (OJ No. C 76/5, Part 3, of 17 June 1969) and in the Council Resolution of 17 December 1973 on industrial policy.

2. The use of pesticides, both preventive and curative, is widespread, especially in agriculture where they are used both for direct protection of fruit, vegetables and trees and for indirect protection against animal parasites or insect pests. Wider and wider use is being made of them, and the demand for them is steadily rising and becoming more diversified. This is stimulating manufacturers to broaden the range of their products in order to meet market demand, thus continually extending the field of their operations. It may be safely said that today almost everybody is using pesticides, whether at work or in the home, and this increases the urgent need for strict control of trade in these products in order to avert any risk to public health.

3. The features peculiar to pesticides - namely, their increasingly widespread use, their toxicity, often considerable, and their harmfulness - are ample justification for the proposal for a directive under consideration.

An essential need is their classification in terms of toxicity and the use of packaging and labelling designed to prevent the product from being faultily used with possibly unfortunate results or a leakage of toxic products due to the use of unsuitable materials for containers.

4. The Committee on Public Health and the Environment welcomes this initiative on the part of the Commission, even though it cannot but deplore the long period that has elapsed between the issuing of the outline directive (1967) and the present directive, despite the fact that the products concerned are dangerous to human health, especially that of agricultural workers.

5. The Committee on Public Health and the Environment agrees with the Commission that the rules laid down in this directive, as in all the other directives relating to harmful and dangerous substances, were drawn up with a view to complete harmonization, that is, to replacing all national provisions not in line with Community provisions. This has always been Parliament's view of this matter; indeed it could not be otherwise, since the object of the directive is the protection of human life and, indirectly, of the environment.

Indiscriminate and incorrect use of pesticides could have serious ecological consequences and influence indirectly the quality of life of the human race.

6. The Committee on Public Health and the Environment feels also that the benefits of harmonization of standards of packaging and presentation of these products extend also to the economic sector.

Standardization of these requirements could result in welcome, even if perhaps limited, cost reductions. At a time when prices of all the technical aids used in agriculture are soaring, this is certainly a factor not to be lightly disregarded, apart from the fact that a safer product offers the advantage that it is at once easier to use and more attractive. This leads to its wider use and therefore to higher returns.

7. The purpose of this directive is:

- (a) to establish a Community classification of substances used as pesticides by degree of toxicity and harmfulness;
- (b) to set up standards to which packaging and containers for pesticides must conform;
- (c) to provide for labelling which will eliminate or at least reduce as far as possible the danger of faulty use of pesticide products.

These three sets of provisions are concerned solely with the marketing of pesticides.

8. In principle, the Committee on Public Health and the Environment feels that these provisions, laid down with a view to the protection of human health, are capable of achieving the objectives for which they were designed. It should be clearly understood that they are concerned solely with the marketing of pesticides.

The Committee on Public Health and the Environment urges the Commission to see to it that this directive is followed up as soon as possible by other provisions relating to the authorization, distribution and above all the use of pesticides, with particular emphasis on their separate storage in shops and warehouses, conditions of sale with restrictions as to quantity and other aspects, disposal of used packagings and the health of consumers of products sprayed with pesticides.

In the report accompanying the directive it is stated that the harmonization of such provisions is being studied; the Committee on Public Health and the Environment hopes that this study will be completed as soon as possible.

9. The legal basis of the directive under consideration is Article 100 of the EEC Treaty. There are marked differences between national provisions, both legislative and administrative, in this field. These differences could lead to distortions of free competition and thus interfere with the smooth operation of the common market. The Commission is right, therefore, to use Article 100 of the EEC Treaty as the basis for its directive, which, by harmonizing the legislative provisions of its Member States, sets up orderly arrangements binding on all Member States.

CONSIDERATION OF THE PROPOSAL FOR A DIRECTIVE

10. Article 1 of the directive defines its area of application and lays down that it regulates the use of dangerous substances and preparations being marketed as pesticides.

Paragraph 2 of the same article provides that the directive shall not apply to medicines, narcotics and radioactive preparations, while subparagraph (b) states that the directive does not apply to the carriage of dangerous substances by rail, road, inland waterway, sea or air; and finally, that it does not apply to preparations to be exported to third countries.

The Committee on Public Health and the Environment would like to point out, first of all, that narcotics and radioactive preparations can be particularly dangerous to public health, and therefore invites the Commission to issue directives as soon as possible regulating the sale and use of these substances.

Annex III of the directive contains a list of dangerous substances. Article 1(3) refers to the directive of 27 June 1967 which, in Article 2(2), lays down that the substances and preparations which must be regarded as dangerous are those which are explosive, oxidizing, easily flammable, flammable, toxic, harmful, corrosive and irritant.

The Committee on Public Health and the Environment invites the Commission to use all the means at its disposal (Article 8(c) of the directive of 27 June 1967) to keep this list regularly updated in view of the fact that, with technical progress and the emergence of fresh needs, more and more new products and preparations are being put on the market containing dangerous substances not covered by the list in question.

11. Article 2 specifies the properties a product or preparation must have in order to be defined as a pesticide. In general, the use for which it is intended will determine its quality.

The Committee on Public Health and the Environment agrees on the whole with these requirements.

12. Article 3 regulates the first main subject of the directive, namely, the classification of pesticides by the degree of toxicity or harmfulness.

It may be remarked here first of all that the directive already quoted (of 27 June 1967) clearly spells out what must be understood by 'toxic' products and what is to be understood by 'harmful' products. In Article 2(2), subparagraph (e), in fact, it lays down that toxic products and preparations are those which, if they are inhaled or taken internally or if they penetrate the skin, may involve serious, acute or chronic health risks and even death.

Harmful substances and preparations, on the other hand, are those which, if they are inhaled or taken internally or if they penetrate the skin, may involve limited health risks.

It is therefore mainly a matter of gradation in toxicity between a lethal maximum and a minimum which may only cause discomfort without any serious danger.

Classification of pesticides begins from a degree of acute toxicity conventionally indicated by the lethal dose for 50% of the animals, normally rats, used in the toxicological tests. This lethal dose is indicated by the symbol LD-50, the value of which varies according as the product is administered to the guinea pig orally, through the skin or in the form of gas or liquid gas. The LD-50 factor also varies naturally with the body weight of the guinea pig used in the toxicological test.

Annex I of the directive under consideration lays down precise provisions for the toxicological classification of substances and preparations.

Another system for classifying pesticides is laid down in Annex II, which details the methods for classifying pesticides by calculation.

This system is used when the product is clearly toxic or harmful on the basis of its components or when it is substantially similar to another preparation which has already been classified and the toxicological data relating to its composition sufficiently well established.

If this last system of classification leaves room for doubt, the competent authorities may resort to biological tests to check the accuracy of the classification.

In the report attached to this directive the Commission points out that it was assisted in drafting this directive by a group of experts on public health, hygiene, agriculture and industrial safety as well as professional organizations from the industrial sector concerned and consumer representatives. In a comment on Article 3 it is added that these values have been fixed at a sufficiently high level to guarantee the protection of the consumer and of the environment with a wide safety margin.

The Committee on Public Health and the Environment is convinced that the methods of classification, whether biological methods using guinea pigs or the calculation method, afford a sufficient guarantee of safety. In addition, this view is corroborated by expert opinion, and for this reason the committee has no special observations to make in this sector. However, it urges the Commission to keep up with technical progress in this matter and to take action in the event of classification systems being discovered which might be more accurate and give a better guarantee of safety. It would be very desirable also, as already stated, that the list of substances used in manufacturing pesticides should be regularly updated.

13. According to Article 5, packagings must be made of materials not liable to attack by the contents or liable to form harmful or dangerous compounds with the contents and which are of such guaranteed solidity as to prevent any possible escape of their contents. Obviously the closures and sealing of the packages must also meet similar strength and safety requirements.

The Committee on Public Health and the Environment shares the Commission's concern which led it to lay down such detailed and strict provisions with regard to packagings. There can be no doubt that defective and inadequate packaging can be a source of serious danger to the person who must handle such containers in order to use their contents and, in fact, constitute a general hazard.

14. It frequently happens in rural areas that containers which have held pesticides are unknowingly used for other purposes, thus creating a source of danger for those who use them in this way. It would be necessary, therefore, either to manufacture a kind of packaging which could not be used for any other purpose - something that would give rise to considerable difficulty in practice - or else to put a warning against further use on the package itself, thus putting the user on his guard.

The Committee on Public Health and the Environment proposes, therefore, that a sub-paragraph (d) should be added, to be worded as follows:

'(d) packagings must contain a legible and indelible warning against re-use'.

15. The Community requirements for labelling on packages are set out in detail in Article 6 of the directive.

The Committee on Public Health and the Environment agrees with and commends the meticulous fashion in which these requirements have been laid down. They range from the name and address of the manufacturer of the product to the danger symbols (as prescribed in the directive of 27 June 1967), to safety advice and to an indication of authorization where this is required.

There are, however, some points which the Committee on Public Health and the Environment would like to make. If the health of the user or consumer of a product sprayed with pesticide is to be adequately safeguarded, the committee considers it essential that the label should indicate legibly and indelibly the name of a possible antidote. Often these are things which are readily available (milk, alcohol, water, etc.) and their use at the very beginning may avert greater danger. The committee proposes, therefore, that a sub-paragraph (h) be added to Article 6(2) to be worded as follows:

'(h) indication of a specific or general antidote''.

16. The Committee on Public Health and the Environment also urges the Commission to issue as soon as possible a directive laying down special provisions on authorization. Such a directive is an essential follow-up to the directive under consideration and in addition, it is precisely those preparations that require prior authorization that are in principle the most dangerous ones. The report attached to the directive under consideration tells us that a directive along the desired lines is being studied at present, and the Committee on Public Health and the Environment welcomes this, but invites the Commission to see to it that this directive is submitted as soon as possible.

17. Article 6(4) deals with the safety advices to be put on packages and lays down that they must correspond with the indications given in Annex IV to the directive of 26 June 1967 and in Annex V to the directive under consideration.

The Committee on Public Health and the Environment points out that it is desirable that this safety advice should be worded in the language or languages of the importing country. The need for this requirement is obvious. The workers who normally use pesticides obviously cannot be required to know all the languages of the Community. It follows from this that safety advice, if it is to be effective in averting harmful consequences, must be given in the language of the country importing these products.

The Committee on Public Health and the Environment suggests, therefore, that after the words 'safety advice' in paragraph 4 the phrase 'worded in the language or languages of the importing country' should be added.

18. Article 6(6) states that indications of the harmlessness of the preparation to bees and to any other specified organism (pests, fish, game) may be added to the indications referring to the normal use of the pesticide. Special indications of toxicity to domestic animals are obligatory where the preparation is particularly dangerous to these species. The Committee on Public Health and the Environment does not consider this distinction satisfactory and feels that it should be compulsory to indicate on the labels of pesticides the toxicity of the product to bees, fish, game, insect-eating birds, etc. It suggests, therefore that in Article 6(6) the words 'may be added' should be replaced by 'must be added'.

Fish, game and bees may form part of the productive activities of an agricultural holding, and insectivorous birds, which are valuable to farmers, must be protected in the most effective possible manner. These considerations might encourage the pesticide user to prefer a product that would be harmless to the abovementioned animals and encourage manufacturers to step up research designed to enable preparations of a generally harmless nature to be put on the market.

19. Article 7 lists the requirements for labels - their dimensions, their colour, etc. While agreeing in principle with the provisions set out in this article, the Committee on Public Health and the Environment feels nevertheless that it would be advisable to make one change in paragraph 4 of this article. This paragraph states that Member States may require the text of the label to be in the national language or languages. This naturally also applies to the wording of the safety advice on the packaging.

It may be presumed that most of those people who handle dangerous preparations will not understand labels in a foreign language. In the interests therefore of safety and of health protection, the Committee on Public Health and the Environment suggests that the word 'may' be replaced by the word 'must'.

The protection of human health is one of the main objectives of the Community legislator.

20. Article 8 of the directive permits a Member State to use labelling other than that prescribed in the case of non-toxic pesticides and pesticides which do not present any danger to persons handling the preparations, provided that it informs the Commission of its action.

The Committee on Public Health and the Environment has no objections to this article, since the safety and health of the user are not at issue in this case, and agrees to this exception.

21. However, a pesticide, while satisfying the requirements of this directive, may turn out to be of a nature such as to present a safety risk. In this case the Member State may, pursuant to Article 10, prohibit the sale of this preparation, informing the Commission immediately of its action.

This is by way of exception to the previous article, Article 9, which forbids any Member State to prohibit, restrict or impede the placing on the market of pesticides where the requirements of this directive with regard to classification, packaging and labelling are satisfied. The protection of public health is, however, ample justification for this exception.

22. The procedure for adapting the Annex to technical progress is that laid down in Article 8(c) of the directive of 26 June 1967, as stated in Article 11. This article provides for the setting up of a committee for the adaptation to technical progress of directives aimed at the elimination of technical obstacles to trade in the dangerous substances sector.

The Committee on Public Health and the Environment once again expresses its reservations on the operation of 'committees' in the process of implementing secondary Community legislation. It has always considered and still considers that these committees should be given a purely consultative function within the implementing procedure.

CONCLUSIONS

The Committee on Public Health and the Environment favours the adoption of this directive, the purpose of which is to reinforce the protection and the safeguarding of public health and particularly of workers using pesticide products.

It urges the Commission, however, to see to it that this directive is followed as soon as possible by others relating to the use and distribution of pesticide products so as to provide comprehensive provisions on the sale of these products and preparations. It insists similarly that a directive governing the authorization of pesticides should be submitted for its consideration as soon as possible. It also insists that the amendments proposed to the text of this directive be adopted by the Commission.

OPINION OF THE LEGAL AFFAIRS COMMITTEE

Letter from Mr W. J. Schuijt, chairman of the Legal Affairs Committee, to
Mr Della Briotta, chairman of the Committee on Public Health and the
Environment

Luxembourg, 5 March 1975

Dear Mr Chairman,

At its meeting of 5 March 1975, the Legal Affairs Committee considered and unanimously approved¹ the proposals from the Commission of the European Communities to the Council

- for a Directive on the approximation of the laws of the Member States relating to ceramic articles intended to come into contact with food (limitation of extractable quantities of lead and cadmium) (Doc. 458/74); and
- for a Directive on the approximation of the laws, regulations and administrative provisions of Member States relating to the classification, packaging and labelling of pesticides (Doc. 460/74)

which had been forwarded to the committee for its opinion by the President of the European Parliament with the letters from the Secretary-General of the European Parliament dated 5 February 1975.

Although the Legal Affairs Committee considers that these proposals present no essential problems of a legal nature, it nevertheless feels that attention should be drawn to the following points concerning the first proposal for a directive:

- (a) Article 2(2) might be thought superfluous. This Article lays down provisions on the marketing of products which have the appearance of the articles listed in Article 1, but which are nevertheless outside the scope of the directive. In other words, these are products which, according to Article 1, may not be 'employed for these purposes' (the purposes of the articles listed). There seems little point in laying down provisions in this connection for such products which, at least in the area covered by the directive, do not present any health risk.

¹ Present: Mr Schuijt, chairman; Mr Jozeau-Marigné and Mr Bermani, vice-chairmen; Mr Bayerl, Mr Brugger, Mr D'Angelosante, Mr Geurtzen, Mr Rivierez, Mr Santer and Mr Vernaschi.

- (b) It would be better in Article 4(3) to speak of '... language or languages ...' because two Community countries, Belgium and Ireland, have more than one official language. There is also the question - although this is really the concern of the committee responsible - of whether it would not be advantageous to the consumer if it were compulsory for the labelling to be in the language of the country in which the product is used. The same applies to Article 6(4) of the second proposal for a directive.
- (c) According to the Commission's observations on Article 7 and 8, the Committee for Adaptation to Technical Progress in the ceramic products sector referred to in these provisions should be replaced by the Standing Committee on Foodstuffs, set up on 13 May 1969, when the proposed outline directive on the approximation of Member States' legislation materials and articles intended to come into contact with foodstuffs (Doc. 226/74) enters into force. The present proposal for a directive, as judged in the first recital of the preamble, is in fact a regulation implementing the outline directive referred to above, which has not yet been adopted, which refers in Article 9 to the Committee on Foodstuffs and on which the European Parliament delivered its opinion on 11 November 1974¹.

It may be asked why the Commission did not already mention the Standing Committee on Foodstuffs in Articles 7 and 8 as it is reasonable to assume that the present proposal for a directive is not to enter into force before the proposed outline directive referred to above is adopted by the Council.

If, however, the present directive is adopted before the outline directive, it might well be desirable to stipulate expressly in this draft that the Standing Committee on Foodstuffs will replace the Committee for Adaptation to Technical Progress in the ceramic products sector as soon as the outline directive enters into force.

.....

(sgd.) Dr W. J. SCHUIJT

¹ OJ No. C 135, 9 December 1974; ORTH Report (Doc. 321/74)

OPINION OF THE COMMITTEE ON ECONOMIC AND MONETARY AFFAIRS

Letter from Mr K. Mitterdorfer to Mr L. Della Briotta, chairman
of the Committee on Public Health and the Environment

Brussels, 28 February 1975

Dear Mr Della Briotta,

On 5 February 1975 the Committee on Economic and Monetary Affairs was asked by Parliament to draw up an opinion for your committee on proposals for directives Docs.460/74 and 458/74. It considered these documents on 27 February and instructed me to forward to you the following observations by way of an opinion:

Doc. 460/74:

This proposal for a directive represents a further step towards the removal of technical obstacles to trade necessary for the free movement of goods within the Common Market. The Committee on Economic and Monetary Affairs stresses that the Commission has chosen the method of complete harmonization for the protection of health and the environment.

Doc. 458/74:

This proposal for a directive also represents a contribution towards the free movement of goods. Nonetheless, the committee would point out that a somewhat formalistic approach has been adopted on labelling and that it might be wise to reconcile a legitimate concern with consumer safety with the practical necessities of the market.

The Committee on Economic and Monetary Affairs has maintained for years that complete harmonization of national provisions provides the best guarantee of consumer protection through the removal of technical obstacles to trade.

Please consider these remarks as the unanimously approved opinions of the Committee on Economic and Monetary Affairs to your committee¹ on the Commission's proposals for directives on the approximation of the laws, regulations and administrative provisions of Member States relating to the classification, packing and labelling of pesticides (Doc. 460/74) and to ceramic articles intended to come into contact with food (limitation of extractable quantities of lead and cadmium) (Doc. 458/74).

.....

(sgd.) Karl MITTERDORFER

¹ The following members were present: Mr Lange, chairman; Mr Notenboom and Sir Brandon Rhys Williams, vice-chairmen; Mr Mitterdorfer, draftsman; Mr Artzinger, Mr Bersani, Mr Burgbacher, Mr Carpentier, Mr Normanton, Mr Petersen (deputizing for Mr Achenbach), Mr Radoux (deputizing for Mr Delmotte), Mr Scholten and Mr Starke.

