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Sent: 14 September 2006 14:42

To: Juan Caicedo

Cc: Karola.GRODZKI@cec.eu.int; Klaus.Berend@cec.eu.int;

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Subject: RE: Cd Review....FW: Circulation of the review of scientific information on lead and cadmium (revised draft of 18 August 2006)

Dear Mr. Juan Caicedo,

First of all I would like to thank you for sending us the second draft of the Review of scientific information on cadmium and for the very good preparation of the workshop next week.

Having read this second draft we would like to respond to your request to submit initial comments in writing as regards chapter 5.2.5 (Particulars on cadmium in agricultural soils) as this chapter refers extensively to work of our unit in the European Commission on potential Community legislation on cadmium in (phiosphate fertilisers)

As the text of 5.2.5 as it stands contains largely a risk management debate I have some doubts whether it is correctly placed in chapter 5. We may wish to reflect whether chapter 9 is not more appropriate (see para 457). A split of the text could be a solution as well, so that paras 253 -261 are moved to chapter 9.

On para 253

I am not sure whether the current argumentation is understandable. Our understanding of the current situation is that European countries import at present rather large quantities of rock phosphate of a relatively high cadmium content. A shift to low phosphate rock would first of all be difficult as alternative sources are not readily available (see table 5.13), but it would as well have severe socio-economic consequences for some developing countries, which supply rock phosphate to European countries at present.

On para 255

The study of Hutton and de Meeus was produced in 2001 for our unit in DG Enterprise of the European Commission. Alas its conclusions on the technical and financial viability of decadmiation could not be confirmed in subsequent expert discussions and we cannot recommend to use these cost estimates. Consequently we would suggest to drop para 255.

On para 260

This para describes a draft proposal elaborated in 2003 by DG Enterprise of the European Commission which was sent out to stakeholders for consultation purposes. The proposal has not been adopted by the European commission subsequently and the last sentence of the para is therefore factually wrong. As legal owners of the text we would regard it as outdated and it should not be used in the Scientific Review. Consequently para 260 should be dropped.

If time allows I would be happy to explain the current state of our works on cadmium further, however, as we mentioned in our previous submission, discussions on this complex issue are ongoing and the European Commission has not adopted a formal position yet.

I look forward to seeing you next week in Geneva.

With best regards

Wolfgang Hehn

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