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1 MAJ 2014

## Høringsvar: 'Strategi for risikovurdering af 'Visse kobberforbindelser': Kobber(I)oxid, Kobber(II)sulfat og Kobber(I)Chlorid

Til Miljøstyrelsen,

Jeg har med interesse læst Miljøstyrelsens 'Strategi for risikovurdering af 'Visse kobberforbindelser'. Jeg har mere end 10 års forskningserfaring med kobber og dets effekter på mikroorganismer i jord; herunder specifik erfaring med koblingen mellem kobber og antibiotikaresistens. Derudover har jeg i de sidste to år været en del af et internationalt netværk af forskere fra universiteter, industri og udenlandske 'miljøstyrelser', der arbejder med at tilvejebringe og udveksle viden af relevans for risikovurdering af antibiotikaresistens i naturen. Jeg har flg. bemærkninger til strategien:

1. Jeg anerkender i høj grad behovet for vidensopbygning vedrørende forbedret kortlægning af kobbers eventuelle ophobning i danske landbrugsjorder, der modtager svinegylle; her især svinegylle fra smågrisebesætninger.
2. Jeg anerkender i høj grad behovet for vidensopbygning om udvikling af kobberresistens i danske landbrugsjorder, der modtager svinegylle; her især svinegylle fra smågrisebesætninger. Vi har vist, at kobber selekterer for kobber- og antibiotikaresistens i jordbakterier, men der er et behov for undersøgelser under realistiske kobber udbringningsscenarier.
3. Jeg vil anbefale, at vidensopbygningen under Pkt 1 og 2 koordineres, således de samme jordprøver anvendes til begge undersøgelser. KU indgår gerne i en dialog med Miljøstyrelsen med henblik på at sikre den bedst mulige planlægning og udførelse af den krævede vidensopbygning.

Med venlig hilsen,

A handwritten signature in black ink, appearing to read 'K.K. Brandt'.

Kristian Koefoed Brandt, lektor, Ph.D.

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