

15/03/2015
Rue de la Pepiniere 1
1000 Brussels

Dear Sir or Madam,

Last Tuesday, 8th of March, the Standing Committee on Plant Animal Food and Feed (PAFF) postponed the vote on the re-approval of glyphosate in the EU. Unable to reach a qualified majority voting (QMV), the European Commission (EC) asked the Member States to give their suggestions by 18th of March.

With this letter we are seeking your immediate reaction on this matter and we're hoping you will propose to suspend glyphosate's re-approval in the EU.

In complete disregard to the growing scientific evidence on the toxic potential of glyphosate to humans, the environment, and agriculture, the EC proposal includes not only its authorization for nearly the maximum period possible (14 years) but has also increased the acceptable daily intake (ADI) by 66% (from 0.3 mg/kg to 0.5 mg/kg), i.e. higher amount of glyphosate residues will now be tolerated in our food.

Glyphosate-based weed killers are far from harmless. Last year, glyphosate was classified by the International Agency for Research on Cancer (IARC) of the World Health Organisation (WHO), as a "probable human carcinogen" (equivalent to carcinogenic category 1B in Europe). In Europe according to the Plant Protection Product Regulation (PPPR) 1107/2009 such a pesticide ingredient must not be authorised unless exposure is proven to be negligible (Article 4.1; Annex II 3.6.3).

But in Europe, the assessment of glyphosate by German Federal Institute for Risk Assessment (BfR) acting as a rapporteur member state (RMS) for the European Commission and the peer-review of European Food Safety Authority (EFSA) concluded that glyphosate poses "no carcinogenic hazard for humans" or any other hazard related to human health or the environment¹.

This divergence in the cancer-induction potential of glyphosate is in the interpretation of the results. IARC took into account only publicly available studies and considered: "limited" evidence for cancer the malignant tumours in 2 mice studies, "sufficient" evidence for cancer the non-Hodgkins lymphoma in 3 human case studies from 3 different countries and in 1 meta-analysis study, and finally "strong evidence" the results for genotoxicity following exposure to glyphosate or glyphosate-based products². BfR and EFSA considered all these effects as "weak evidence" and not relevant to glyphosate exposure, and used other undisclosed studies to support their argument.

In reality BfR in its addendum found not two but five mice studies with significant malignant tumours, when using the same statistical test as IARC, and recommended

¹ <http://www.pan-europe.info/press-releases/2015/11/efsa's-un-scientific-opinion-glyphosate-not-carcinogen>

² <http://monographs.iarc.fr/ENG/Monographs/vol112/mono112-09.pdf>



by OECD³ (Annex 1). The lack of scientific justification in the way BfR and then EFSA dismissed all the positive cancer findings, is extremely concerning and has already been publicly exposed and criticized by independent scientists and toxicology experts⁴.

The fact that the industry provides the tests for its own products, is already problematic and casts doubt on the validity and impartiality of the data. But the Pesticide Unit of the European Commission is known to favour pesticide industry data even when they contain vital evidence gaps that, if included, might not permit approval. The assessment of glyphosate appears to be another such example. In a recent verdict, the European Ombudsman criticized the Directorate of Health (DG Sante) for maladministration, authorising pesticides with data gaps in their evaluation that may have serious consequences for human and environmental health⁵.

But this is not the end of the story, as the carcinogenicity of glyphosate appears to be only the tip of the iceberg for this compound. The European Authority dismissed dozens of independent studies showing a range of adverse effects resulting from glyphosate exposure: reproduction problems and diseases in farm animals (Krüger and Shehata, 2014)⁶, diseases in humans^{7,8}, reproduction and development effects in laboratory animals⁹, resistance of harmful bacteria and susceptibility of beneficial bacteria¹⁰, crop debilitation and pest resistance¹¹. Scientists around the world have sent their warnings to the EC^{12,13} and it is literally dangerous to ignore them.

Taking into account all the adverse effects related to glyphosate exposure from the independent literature and the correct interpretation of regulatory studies glyphosate should be banned since the criteria set in Annex II 3.3.3 to 3.6.4 and 3.7 of PPPR 1107/2009 are not satisfied (Article 4.1).

The use of glyphosate is increasing globally, not only in our crops, orchards, and vineyards but also in our parks, gardens, train tracks, and cemeteries. Glyphosate food residues have doubled in the last 3 years, and recently in Germany, traces of glyphosate were detected in 99.6% urine samples of 2000 consumers, and 3/4 were above the safety limits, of which most were children¹⁴. Thus, we are much more

³ http://www.pan-germany.org/download/PAN_Germany_Addendum_analysis_09112015.pdf

⁴ <http://jech.bmj.com/content/early/2016/03/03/jech-2015-207005.full>

⁵ <http://www.ombudsman.europa.eu/press/release.faces/en/64156/html.bookmark>

⁶ http://www.ensser.org/fileadmin/files/Science_in_the_Eye_of_the_Storm/II_Monika_Krueger_-_Collateral_damages_of_the_herbicide_glyphosate_in_dairy.pdf

⁷ Swanson NL, Leu A, Abrahamson J, Wallet B, 2014. Genetically engineered crops, glyphosate and the deterioration of health in the United States of America. *Journal of Organic Systems*, 9(2): 6-37

⁸ Samsel A, Seneff, S, 2015. Glyphosate, pathways to modern diseases III: Manganese, neurological diseases, and associated pathologies. *Surg Neurol Int.* 6:45

⁹ Mesnage R, Defarge N, Spiroux de Vendomois J, Seralini G.E., 2015. Potential toxic effects of glyphosate and its commercial formulations below regulatory limits

¹⁰ Shehata AA, Schrodil W, Aldin AA, Hafez HM, Kruger M, 2012. The Effect of Glyphosate on Potential Pathogens and Beneficial Members of Poultry Microbiota In Vitro. *Curr Microbiol* DOI 10.1007/s00284-012-0277-2

¹¹ <http://www.i-sis.org.uk/glyphosatePoisonsCrops.php>

¹² <http://ehjournal.biomedcentral.com/articles/10.1186/s12940-016-0117-0>

¹³ <http://www.ensser.org/media/0116/>

¹⁴ <https://www.euractiv.com/section/agriculture-food/news/overwhelming-majority-of-germans-contaminated-by-glyphosate/>



exposed than what we previously thought and we are putting our children's health in danger.

Furthermore we would like to bring your attention to the following points:

- There is a lack of scientific consensus between regulators and independent scientists on the carcinogenicity of glyphosate. In such cases the Pesticide Regulation must apply "the precautionary principle to ensure that active substances or products placed on the market do not adversely affect human or animal health or the environment" (PPPR 1107/2009; Article 1.4).
- The data on the endocrine disrupting potential of glyphosate for humans and non-target organisms are missing. According to the Pesticide Regulation "particular attention should be paid to the protection of vulnerable groups of the population, including pregnant women, infants and children" (PPPR 1107/2009, recital 8). The European assessment has dismissed all independent studies showing endocrine-related effects of low, environmentally relevant doses of glyphosate, without having the data from the required OECD test guidelines for endocrine disruption.
- Glyphosate threatens the future of agriculture as it gradually weakens the crops by immobilising soil nutrients and promoting the development of fungi, pathogens, and diseases, which then require the use of different pesticide products along with glyphosate¹⁵. Farmers are becoming even more pesticide-dependent, which is against the principles of Sustainable Use Directive (2009/128/EC) and Integrated Pest Management, which must be implemented in all EU countries as of 2014 to promote low pesticide-input management using non-chemical methods.

Finally, the European Chemical Agency (ECHA), being the official agency for harmonized classification of chemicals in EU, will also review the carcinogenic potential of glyphosate but its assessment, which just started, won't be completed before the end of 2017. Considering the scientific controversies, it will be irresponsible towards European citizens to take a final decision before ECHA delivers its conclusion.

We hope you take into consideration our concerns related to glyphosate exposure and you decide to prevent the re-authorisation of this harmful chemical in Europe.

Yours faithfully,

Angeliki Lyssimachou, PhD
On the behalf of PAN Europe

¹⁵ <http://www.i-sis.org.uk/glyphosatePoisonsCrops.php>