



PAN Europe’s Policy Recommendations Concerning Renewing the Approval of Glyphosate in the EU

- 1) **We call on the European Commission** to withdraw the current implementing Regulation proposal on renewing the authorisation of the active substance glyphosate in the European Union for 10 years (from 16/12/2017 to 15/12/2027), with no restrictions, as this substance does not fulfil the requirements of the Plant Protection Products Regulation 1107/2009 to provide a high level of protection for humans, animals, the environment and its ecosystems, taking into consideration the precautionary principle. This is based on the following facts:
 - a. Glyphosate was officially classified as a probable carcinogen by the International Agency Research on Cancer of the World Health Organization; according to Article 4.1 of Plant Protection Product Reg. 1107/2009, active ingredients that are probable carcinogens should not be authorized for use;
 - b. It’s toxic to aquatic organisms with long lasting effects (Aquatic Chronic 2; H411)¹ and the risk of long-term toxicity to birds is high²;
 - c. Disturbs soil communities and consequently soil fertility and is detected in 45% of European soils³;
 - d. Is a non-selective herbicide, which means that it kills all plants, including the ones attracting pollinators and natural predators;
 - e. Being broad-spectrum, glyphosate does not comply with Integrated Pest Management and Directive 128/2009, where pesticides used as a last resort have to be specific to the target pest and have no impact on non-target species;
 - f. Has an impact on ecosystem services;
 - g. Having antibacterial properties, it affects the balance of microbial communities, including the ones of soil, that have a key role in combatting pathogens and diseases⁴;

¹ CLP Regulation (EC) No 1272/2008

² EFSA, 2015. Peer review of the pesticide risk assessment of the active substance glyphosate

³ Silva et al. (2017). Distribution of glyphosate and aminomethylphosphonic acid (AMPA) in agricultural top soils of the European Union. *Sci Tot Environ*
<https://doi.org/10.1016/j.scitotenv.2017.10.093>

⁴ Johal GS, Huber DM, 2009. “Glyphosate Effects on Diseases of Plants.” *European Journal of Agronomy* 31: 144–52.



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- h. There are hundreds of studies in the scientific literature which reveal various adverse health effects of glyphosate-based products on experimental animals, wildlife, the environment and its ecosystems that cannot be overlooked as these product formulations are not as rigorously assessed as the active ingredient⁵;
- 2) We call on the European Commission to submit, and Member States to vote in favour of a new proposal with the necessary provisions to:
 - Withdraw, as from 15/12/2017, the authorisation of glyphosate for use in public areas such as parks, sidewalks, school yards, cemeteries and others, in all Member States by adopting weed management methods that do not incorporate the use of substances that are toxic to living beings.
 - Withdraw, as from 15/12/2017, the authorisation of glyphosate for private and non-professional uses;
 - Withdraw, as from 15/12/2017, the authorisation for pre-harvest use of glyphosate as a crop desiccant, giving farmers a one-year deadline to ensure compliance. This method results in high residue levels in crops, exposing both wildlife (e.g. birds) and consumers;
 - Include the necessary conditions for environmental monitoring after glyphosate use (Art 6, 1107/2009);
 - Phase out as from 15/12/2017 the use of glyphosate in agriculture where alternative methods such as integrated weed management exist;
- 3) We call on the European Commission to phase out all uses of glyphosate by 15/13/2020 giving Member States a 3-year period, to make a clear plan on how to assist farmers in this change, as for some it will be challenging.
- 4) We call on the European Commission to accelerate the process of identifying which co-formulants are toxic and thus should not be included in pesticide products
- 5) We call on the European Commission to reform through REFIT the authorization system of pesticide approval in EU by increasing transparency, using studies that are publicly available, carrying out the assessment in blinded experiments and removing the confidentiality for tests that involve human and environmental exposures and health risks.
- 6) We call on the European Commission to help the move towards a glyphosate-free future by undertaking the following actions starting from now:
 - Reform the CAP; support transition to low impact agriculture, use pesticide dependency reductions as one of the CAP's success indicators;

⁵ Watts et al. 2016. The Glyphosate Monograph. PAN International.



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- Keep giving priority in European research and innovation projects based on the transition to low-impact farming, and as part of the studies on alternatives to herbicides. Start by composing a database of weeds and non-chemical solutions for weed management and make it available to farmers and public authorities.

We call on Member States to help the move towards a glyphosate-free future by undertaking the following actions starting from now:

- 1) Monitor glyphosate residues in the environment, food and biota, in accordance to Article 68, Reg. 1107/2009:
 - a. measure glyphosate levels in topsoils as part of the Land Use and Coverage Area Frame Survey, with next soil sampling being done in 2018, to follow up on the fact that glyphosate and its metabolite AMPA were detected in 45% of European soils;
 - b. measure glyphosate levels in water;
 - c. measure glyphosate levels in environmental sentinel species;
 - d. measure the glyphosate levels in food, particularly where glyphosate was used as a desiccant (cereals, bread, oats, muesli).
- 2) Provide use statistics and sale statistics at the level of active substance in accordance with Regulation (EC) No 1185/2009 concerning statistics on pesticides, based on the reference to Article 67 of the EU Regulation no 1107/2009 on authorization and marketing of plant protection products making it mandatory for all farmers to register their use of pesticides and keep record of their use over the last three years.
- 3) Expand already-existing forecast and warning systems on pest outbreaks, for example regular bulletins established in the majority of member states to also include weeds, as already foreseen in EU Directive 128/2009 on sustainable use of pesticides.
- 4) Offer financial support as part of the current rural development scheme helping farmers to meet some of the costs linked to the transition, giving priority to preventive agronomic measures, helping farmers move towards the approach of integrated weed management.
- 5) Disseminate knowledge through the Farm Advisory Service (FAS) on integrated weed management and alternatives to pesticides already gathered by projects (like e-print), farmers' knowledge and organisations like the European Weed Research Society, among others. As of 1st January 2015, advisors within the Farm Advisory Service (FAS) whose advisers, need to be prepared to inform farmers about uptake of integrated pest management according to EU Regulation (EU) No 1306/2013.