





To: Ursula von der Leyen, President of the European Commission
Cc: Maroš Šefčovič, Executive Vice-President for European Green Deal, Interinstitutional Relations and Foresight
European Commission
Rue de la Loi 200 B-1049 Brussels

Brussels, on November 14th 2023

Subject: Stop the re-approval of glyphosate in light of new scientific evidence on cancer risk

Dear President of the European Commission,

We, the undersigned 106 European civil society organisations, wish to express our support for the European Commission's commitment, under the European Green Deal, to transition the EU towards sustainable food systems, reduce reliance on chemical pesticides, and protect human health, the environment, and biodiversity from pesticide pollution. In this regard, we are writing to you to request your intervention in ensuring that the Commission withdraws its proposal to renew glyphosate's approval for 10 years, in light of new compelling evidence showing that the substance causes leukaemia in young rats. Considering the increasing evidence from independent scientific studies that link exposure to this popular pesticide with a range of harmful effects on humans and the environment, we call upon you to take action and propose the non-renewal of its approval.

The [first carcinogenicity data](#) from the Global Glyphosate Study (GGS) were recently made public and show that even low doses of glyphosate-based herbicides¹ (GBHs) - which were previously assumed to cause no adverse effects during the EU assessment - resulted in early deaths from leukaemia in rats, following early-life exposure². One of the GBHs tested in the GGS was the representative formulation BioFlow (MON 52276), for which the European Food Safety Authority (EFSA) had recently wrongfully concluded there were "no critical areas of concern" - meaning that it fulfils all the safety criteria for human health and the environment to be approved. As the European Commission is aware, this representative formulation is widely sold in Europe³. These findings are extremely concerning given that glyphosate is the most widely used herbicide in Europe, with [widespread exposure](#) among humans, including children, and is [ubiquitous in the environment](#).

The GGS results add to the [already existing evidence of the substance's carcinogenic potential](#) and unequivocally affirm the concerns voiced by NGOs, trade unions, and independent scientists, offering concrete evidence of the important shortcomings in the EU's scientific evaluation process. It is clear that

¹ At the No Observed Adverse Effect Level (NOAEL)

² The Global Glyphosate Study (GGS) is a multi-institutional international toxicological study. The GGS first carcinogenicity data, released on the 25th of October show that half of the leukaemia deaths seen in rats occurred between 21 weeks (comparable to about 16 years in humans) and 1 one year of age (comparable to roughly 40 years in humans).

³Renewal Assessment Report (RAR), 2021 "The representative formulation is widely registered in the EU. The products with following trade names, have been registered in the three zones (corresponding to South, Central, North EU): Roundup Bioflow – Italy, Roundup Evolution – Netherlands, Roundup Ultra – Sweden".

glyphosate's carcinogenicity and genotoxicity potential has not been properly assessed and crucial evidence from independent literature has not been taken into account in the EU assessment [1]. Furthermore, existing scientific literature points to the genotoxic potential of the representative formulation "Bioflow", and EFSA also reported data gaps in the assessment and indicated potential genotoxicity of certain ingredients. However, instead of raising concerns, EFSA disregarded this evidence and concluded that its use is safe even in the absence of a long-term toxicity or carcinogenicity study on this representative formulation submitted by the applicants. This is beyond comprehension as, according to Regulation (EU) 1107/2009 (Article 4) and as emphasised by the European Court of Justice ([Case C-616/17](#)), products and active substances must be thoroughly assessed to show they cause no long-term toxicity and/or carcinogenicity.

Unfortunately, the carcinogenicity of glyphosate and GBHs is only the tip of the iceberg in relation to the health impacts of glyphosate herbicides. Exposure to glyphosate and GBHs has been linked to neurotoxicity [2], autism spectrum disorders in children exposed from prenatal age [3], as well as amyotrophic lateral sclerosis [4] and Parkinson's disease in adults [5]. It has also been linked to endocrine disruption [6] and alterations in the microbiome [7]. From an environmental perspective, exposure to glyphosate has been shown to cause toxicity to a wide range of terrestrial [8] and aquatic non-target species [9], potentially causing serious [impacts on biodiversity](#). Alarming, all these important harmful effects were also not considered as 'critical areas of concern' by EFSA in its conclusion, for which [the scientific community](#) has already voiced its objections.

Evidently glyphosate fails to meet the approval criteria laid down in Regulation (EU) 1107/2009 according to which pesticide active substances and pesticide products used in the EU should cause no harm to humans, animals and the environment. Taking into account the widespread use and exposure to glyphosate-based products, neglecting the reported adverse effects poses a grave health risk to both farm workers and the general population, and also threatens biodiversity. As the President of the European Commission, it is your responsibility to uphold the principles of the European Green Deal and evoke the precautionary principle, given glyphosate's alarming health and environmental implications. We urge you to intervene and ensure that the European Commission withdraws its proposal for a 10-year renewal of the glyphosate licence and instead proposes its non-renewal, prioritising in this way human health and the environment over maintaining this harmful substance on the market.

Thank you in advance for your consideration.

Yours sincerely,

Martin Dermine
Executive Director
Pesticide Action Network Europe

On behalf of a 106 organisations from all over Europe :

Agrolink
Alerte des Médecins sur les Pesticides (AMLPL)
Alliance for Cancer Prevention UK
Association Forum of Organic Agriculture named M. Górný
Aurelia Foundation, Germany
Avaaz
Baby Milk Action
Biodynamic Federation Demeter International
Bond Beter Leefmilieu, Belgium
Bors Alapítvány, Hungary
BOS+, Belgium
Broederlijk Delen, Belgium
Bündnis für eine enkeltaugliche Landwirtschaft e.V., Germany
Canopea, Belgium
Cantine sans plastique France
Caring Doctors, Netherlands
Caring Farmers, Netherlands
CCFD-Terre Solidaire, France
Child Rights International Network (CRIN)
Coalition Living Earth, Poland
Corporate Europe Observatory (CEO)
Decade of Action
Dryade, Belgium
E-misszió Environmental Association, Hungary
Earth Thrive
Eco Hvar
ECOCITY
Ecologistas en Acción, Spain
Ekō
Energia és Környezet Alapítvány, Hungary
European Alliance of Initiatives for Applied Anthroposophy
European Environmental Bureau
European Federation of Food, Agriculture and Tourism Trade Unions (EFFAT)
European Network of Scientists for Social and Environmental Responsibility (ENSSER)
FAUNA ALAPÍTVÁNY
Felelős Gasztrohős Alapítvány / Heroes of Responsible Dining Foundation
Fenntarthatóság Felé Egyesület, Hungary
Fészek egyesület, Hungary
FIAN European sections/ FIAN Belgium
foodwatch international

Friends of the Earth Europe
Générations Futures, France
GESUNDHEIT AKTIV e.V., Germany
Gibanje Zdrava družba
GLOBAL 2000
Health and Environment Alliance (HEAL)
Health and Environment Justice Support (HEJSupport)
Hogar sin Tóxicos, Spain
INFACT USA
Instytut Spraw Obywatelskich (Civil Affairs Institute), Poland
International Baby Food Action Network
International Society of Doctors for Environment (ISDE), Italy
Join For Water, Belgium
Kétker Közösségi Alapítvány
Kom op tegen Kanker, Belgium
KonVIB
La Mutuelle Familiale, France
Landwijzer vzw, Belgium
Limburgse Milieukoepel vzw
Linked.Farm, Belgium
Magosfa Alapítvány (Magosfa Foundation), Hungary
Magyar Környezeti Nevelési Egyesület (Hungarian Society for Environmental Education)
Magyar Természetvédők Szövetsége (Friends of the Earth Hungary)
Mouvement Ecologique, Luxembourg
Mutualités Libres/ Onafhankelijke Ziekenfondsen
Natagora, Belgium
Nature & Progrès Belgique
Natuur & Milieu, The Netherlands
Natuur en Milieufederatie Zuid-Holland, The Netherlands
Natuurbehoud langs Durme, Moervaart en Schelde
Natuurmonumenten, The Netherlands
Parkinson Vereniging
Pesticide Action Network (PAN) Europe
Pesticide Action Network (PAN) International
Pesticide Action Network Netherlands (PAN-NL)
Pestizid Aktions-Netzwerk e.V. (PAN Germany)
Polish Ecological Club, Poland
Pomona vzw, Belgium
Réseau Civam
Réseau Environnement Santé
Reset.Vlaanderen
Rezero

Safe Food Advocacy Europe
Schweisfurth Stiftung
Secrets Toxiques
Slow Food Deutschland
Solidagro
Stichting Urgenda, Netherlands
Udruženje “Nimbus” Loznica, Serbia
Umweltinstitut München e.V., Germany
Union Nationale de l’Apiculture Française (UNAF)
Veblen Institute for economic reforms, France
Védegylet Egyesület (Protect the Future Association, Hungary)
Velt vzw, Belgium - The Netherlands
Vitale Rassen België
Vlaamse Parkinson Liga, Belgium
Voedsel Anders, Belgium
Vogelbescherming Vlaanderen vzw
Wemove
Werkgroep Natuurlijk Imkeren - WNI.
Wervel, Belgium
Women Engage for a Common Future (WECF) International
Zemljane staze, Croatia
ZERO - associação sistema terrestre sustentável
Zöld Akció Egyesület (Green Action Association), Hungary
Zveza biodinamikov Slovenije, Slovenia

ENDNOTES

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