



To: Mr. Vytenis Andriukaitis
European Commissioner for Health and Consumer Policy
European Commission
B-1049 Brussels.
Vytenis.Andriukaitis@ec.europa.eu

Brussels, April 7, 2015

Concerning : The inclusion of the pesticides Glyphosate and Malathion in the positive list of Regulation 1107/2009.

Dear Commissioner Andriukaitis,

The World Health Organisation's cancer agency IARC has declared the pesticide Glyphosate and Malathion a "probable human carcinogen". The IARC reached its decision recently based on the view of 17 experts from 11 countries, who met in Lyon, France, to assess the carcinogenicity of 5 organophosphate pesticides. The IARC's assessment of the 5 pesticides in its entirety will be published as volume 112 of the IARC Monographs, an overview is already available and is published in the latest issue of The Lancet Oncology (the article is attached to this letter).

We think this important scientific opinion must have an immediate impact on the current inclusion of the pesticide Glyphosate in the positive list of Regulation 1107/2009 as well as on the regulatory procedure for the application for a re-approval of the substance that is ongoing. We specifically ask you to review the approval of Glyphosate and mandate Food Authority EFSA to include the IARC decision in the peer-review that is undertaken by EFSA and use all information such as the 16 epidemiology

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studies assessed by IARC and all other independent peer-reviewed literature to evaluate the evidence available.

Glyphosate is a controversial pesticide and is linked already for decades to adverse effects on the unborn (Report "Roundup and birth defects", <http://www.pan-europe.info/Resources/index.html>), effects which were even observed in the industry studies delivered by the applicant a decade ago. Now the evidence is growing on carcinogenic effects. The studies assessed by the IARC demonstrates induction of renal tubule carcinomas, of pancreatic islet-cell adenoma, of skin tumours as well as DNA and chromosome damage. A classification 1A or 1B for cancer ("may cause cancer") is thus required for Glyphosate and this will automatically trigger the discussion on the Annex II, 3.6.3 provision in Regulation 1107/2009. In addition, the Reassessment Report submitted to the EFSA completely missed to pay attention to the third line of evidence offered by the IARC, i.e. oxidative stress. This serious gap needs urgently to be addressed

In the same Lancet article it is decided by IARC to declare the pesticide Malathion a probable carcinogen too. Also for this pesticide convincing evidence is available for the potential to cause cancer. We ask you to review the approval of the substance based on Article 21 of Regulation 1107/2009 and mandate EFSA to develop an opinion of the classification on carcinogenicity of Malathion urgently.

Glyphosate and Malathion should be taken from the market as a precautionary measure to protect workers, consumers, bystanders and residents against the risks of these chemicals.

We hope for your reaction,
Sincerely yours,

H. Muilerman
PAN Europe chemicals coordinator,
Also on behalf of:

- VELT, Belgium
- CEPTA, Slovakia
- WECF, Netherlands
- Global 2000, Austria
- PAN Italy, Italy
- PAN Germany, Germany

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