

**To: Members of the Appeal Committee**

**Subject: Calling upon Member States to oppose the European Commission's proposal extension of the approval period of the active substance glyphosate**

Dear Members of the Appeal Committee,

On the 14th of October, [ScoPAFF did not give a green light](#) to the one-year prolongation of Glyphosate. However, the EU Commission proposed its prolongation (*COMMISSION IMPLEMENTING REGULATION (EU) .../... of XXX amending Implementing Regulation (EU) No 540/2011 as regards the extension of the approval period of the active substance glyphosate*). Glyphosate is currently approved in the EU until 15 December 2022 and earlier this year EFSA announced the postponement of its conclusions on glyphosate by one year. The EU Commission appealed and [the Appeal Committee](#) convened for a possible vote on the 15th of November 2022.

Since there is enough scientific evidence regarding the unacceptable risk of glyphosate use to human health and the environment, based on the precautionary principle according to EC Regulation 1107/2009<sup>1</sup> Commission and the Member States should ban glyphosate right away.

Bellow, you may find some examples of scientific information justifying the need for the immediate ban of glyphosate as an active substance:

- Glyphosate has been classified by the International Agency for the Research on Cancer (IARC) as "probably carcinogenic to humans" (Group 2A) in March 2015. Further studies since supported the cancer risk ([Portier, 2020](#)). [Health and Environment Alliance Analysis revealed](#) clear and statistically significant tumours in 10 out of 11 animal studies.
- A 2022 [review of industry studies](#) on the DNA-damaging effects of glyphosate by scientists at the Vienna Cancer Research Institute concluded that only two of 35 reviewed industry studies can be considered "reliable", 15 others only as "partly reliable" and 18 of these studies had to be classified as "not reliable", due to substantial deviations from applicable test guidelines.

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<sup>1</sup> Provisions of Regulation (EC) No 1107/2009:

-Article 1(3): the purpose of the regulation is to ensure a high level of protection of both human health and animal health and the environment.

-Article 1(4): 1107 is underpinned by the precautionary principle (where there is scientific uncertainty as to the risks with regard to human or animal health or the environment).

-Article 4(1): an active substance cannot be authorised if it has had a harmful effect on human health or an unacceptable effect on the environment (non-target species incl arthropods, amphibians etc. (see 283/2013), soil, water, air, ecosystems).

/ Combined with the specific provisions of Annex II covered the criteria concerned (for Carcinogenicity 1A & B it is point 3.6.3.; bees it's 3.8.3 & 3.10 for metabolites).

-Independent literature has to be included in the dossier: Article 8(5)/substances are assessed in the light of scientific and technical knowledge (article 4), peer-reviewed literature should be considered (see point 3.6.3 for instance).



- A recent [review](#) underlines the neurotoxic properties of glyphosate and [scientist pointed](#) out that even dismissed industry papers showed neurotoxicity concerns many years before.
- Several other studies<sup>2</sup> proved that glyphosate and glyphosate-based herbicides damage aquatic species in environmentally relevant concentrations.

**As glyphosate or pesticides containing glyphosate cannot fulfil the safety requirements laid down in Regulation (EC) No 1107/2009, allowing its continued approval would go against the precautionary principle and Regulation (EC) No 1107/2009. Therefore, we call on you to reject the EU Commission's proposal to extend the approval period for glyphosate as an active substance.**

We remain at your disposal to exchange in more detail.

Sincerely yours,

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<sup>2</sup> Fish: [Webster, Santos 2015](#), [Fiorino 2018](#), [Zhang 2021](#), [Armiliato Et. Al., 2014](#), [Terrazas-Salgado et al, 2022](#); Crustacea: [Cuhra et al. 2012](#); [Canosa et. al, 2018](#); Amphibians: [Bach, 2018](#), [Bach, 2016](#), [Meza-Joya, 2013](#), [Navarro-Martín, 2014](#)