

***Annex to the European Citizens' Initiative:
Ban Glyphosate and Protect People and the Environment from Toxic Pesticides***

Our European Citizens' Initiative (ECI) aims to achieve a ban on glyphosate as well as further EU-wide measures to protect people and the environment from exposure to toxic pesticides. Specifically, our ECI calls on the European Commission to propose to EU member states:

1. To ban glyphosate-based herbicides, exposure to which has been linked to cancer in humans, and has led to ecosystems degradation
2. To ensure that the scientific evaluation of pesticides for EU regulatory approval is based only on published studies, which are commissioned by competent public authorities instead of the pesticide industry
3. To set EU-wide mandatory reduction targets for pesticide use, with a view to achieving a pesticide-free future

1. We call for a ban on glyphosate, in line with EU pesticide law that prohibits the use of substances that may cause cancer in humans

Glyphosate is one of Europe's most widely used pesticides, and its negative impacts on the environment and biodiversity are clearly documented. In addition, expanding scientific evidence demonstrates that glyphosate is also a serious threat to human health. In 2015, the International Agency for Research on Cancer (IARC) of the World Health Organisation (WHO), classified glyphosate as "*probably carcinogenic to humans*" (a Group 2A carcinogen). IARC has found sufficient evidence in laboratory animals, and limited evidence in humans, that glyphosate can cause cancer. IARC also found that glyphosate exhibits two characteristics associated with carcinogens, namely genotoxicity and the ability to induce oxidative stress. EU Regulation 1107/2009 prohibits the use of pesticides when there is sufficient evidence in laboratory animals that these substances can cause cancer, based on IARC criteria. Therefore EU approval for glyphosate must be withdrawn.

2. We call for changes in the EU scientific evaluation procedures for pesticides

One of the reasons why toxic properties of pesticides are uncovered so late, and these products kept on the market so long, is the way the EU carries out regulatory safety evaluations. These evaluations largely rely on unpublished studies that are commissioned and submitted by the pesticide producers themselves. Two changes are crucial to enhance the rigour of evaluations and public trust in EU regulatory decisions on pesticides:

A. Regulatory studies to support EU pesticide approvals must be commissioned by public authorities, not the industry itself

Laboratories carrying out regulatory studies on pesticides are under tough competition. Their economic welfare crucially depends on their industry customers' appreciation of their work. Despite stringent requirements under OECD Guidelines and the GLP standard, these laboratories retain a certain scope for planning and interpreting study results. Laboratories that report hazardous properties may face disadvantages compared to competitors who overlook possible hazards or downplay the relevance of such findings. This could explain the fact that the majority of regulatory studies on the

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carcinogenicity and genotoxicity of glyphosate performed by contract laboratories reported no adverse health impacts, whereas the majority of independent and published studies indicated the carcinogenicity and genotoxicity of glyphosate.

Studies to assess the safety of pesticides should not be commissioned by those with a very clear vested interest in their outcome. Instead, it must be up for public authorities to decide who carries out the studies. The overall costs of the pesticide authorisation process must continue to be paid by industry, as is already the case.

B. All studies used to back up regulatory approval of pesticides must be published

Public authorities in the EU rely on both published and unpublished data to evaluate the health and environmental impacts of pesticides. When the European Food Safety Authority (EFSA) stated that glyphosate was “unlikely” to cause cancer to humans, it argued that an important reason for this was the fact that it had reviewed additional unpublished industry studies that were not available to the IARC experts. Several persons have filed requests to access these studies. However, more than a year after the publication of the EFSA opinion, the studies have yet to be fully disclosed, despite EFSA's promises for greater transparency.

A recent ruling of the European Court of Justice¹ has confirmed that toxicological data on hazards and risks of pesticides cannot be concealed as trade secrets. Based on this landmark decision, national and EU authorities should release such studies automatically as soon as they receive them, not following freedom of information requests. This would enhance transparency without putting additional strain on public resources. The fact that studies are open to scrutiny by independent experts will improve their quality and help to identify potential scientific misconduct.

C. Industry must not be able to decide which EU member state will lead on the scientific evaluation of their products

Evaluations of pesticide substances are first carried out in one EU member state, and then peer-reviewed by other national authorities and EFSA. Currently, a manufacturer who wishes to have a chemical substance approved or re-approved in the EU can choose in which member state they submit their dossier. In the case of glyphosate, the producers went to Germany, which had already carried out the previous evaluation of the substance. In fact, much of the evidence that led IARC to classify glyphosate as a Group 2A carcinogen was already available to German authorities when glyphosate was first authorised at EU level in 2002. The German authorities dismissed it back then, and glyphosate producers could reasonably expect them to confirm their assessment this time around. The decision as to which EU member state will lead on the scientific evaluation of a pesticide must not be left to the industry.

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3. We call for EU-wide mandatory reduction targets for pesticide use, with a view to achieving a pesticide-free future

In addition to glyphosate, more than 480 other pesticide substances are currently authorised for use in the EU. Most farmers treat their crops with a variety of pesticides on a routine basis, rather than as a last resort in rare cases of heavy pest infestations. Pesticides are also used in cities and in private households. As a result, overall use of pesticides remains high, and a wide variety of pesticide residues is found in food and the environment. The combined effect of these pesticides on the environment and our health is not routinely tested for.

When toxic pesticides are withdrawn from the market, or their use is restricted, the pesticide industry is usually quick to replace them with other chemical substances. In the past, insecticides that were highly toxic to birds and mammals, such as organophosphates, were substituted with neonicotinoids (which are harmful to bees). Glyphosate could be replaced with other toxic herbicides such as dicamba, glufosinate or 2,4-D.

A. EU-wide mandatory reduction targets for pesticide use must be set

EU Directive 2009/128/EC requires that pesticides should only be used when all other methods have failed, and mandates EU member states to establish concrete measures and objectives to reduce overall pesticide use. Member states are currently not sufficiently implementing the directive, and the European Commission has yet to evaluate its effect. The directive must be strengthened by setting EU level targets, accompanied by support measures for farmers, to effectively reduce pesticide use.

B. The goal of the EU must be to achieve a pesticide-free future

The chemicals used in pesticides can affect all organisms and the environment they live in and depend upon, with potentially serious ecological consequences. Ultimately, this puts essential ecosystem services such as pollination, nutrient cycling, soil fertility and, paradoxically, also natural processes of pest control, at serious risk.

A growing body of evidence also shows how the use of pesticides undermines the health of farmers and their families, as well as the wider population. People are exposed to a cocktail of pesticides through the food we consume each day, the water we drink, and air drift in agricultural areas. In cities, and suburban and rural areas, spraying of recreational and public spaces and infrastructure areas also exposes people nearby to a mixture of chemicals. Many substances are also used in households, contaminating homes and gardens.

The only way to avoid the risks and dangers posed by pesticides is to phase out their use in the long term. Non-chemical alternatives to pest and weed management are already available but need political and financial support to be mainstreamed.

¹ <http://curia.europa.eu/jcms/upload/docs/application/pdf/2016-11/cp160128en.pdf>