



26 February 2016
Location XX

Dear XXX

I am writing to you on behalf of XXX to express our concern about the possible re-approval of the controversial active substance glyphosate in Europe, used in herbicide products, for a period of fifteen years.

Last year, glyphosate was classified by the International Agency for Research on Cancer (IARC) of the World Health Organisation (WHO), as a “probable human carcinogen”, following a thorough analysis performed by 17 independent experts using publicly available studies¹.

But in Europe, the assessment of glyphosate by the European Commission (EC) and European Food Safety Authority (EFSA) concluded that glyphosate poses “no carcinogenic hazard for humans” or any other hazard related to human health or the environment².

This has given the green light to the re-authorization of glyphosate in the EU and the Member States representatives are expected to vote in favour in the next standing committee of phytopharmaceuticals on the 7th of March 2016.

The reason for this carcinogenicity divergence lies in the interpretation of data. IARC considered the tumours in laboratory animals and non-Hodgkins lymphoma in humans following exposure to glyphosate as significant, whereas EC and EFSA conclude they are not relevant to exposure³. The “tricks” used by the European Authorities to dismiss positive tumour data and arrive at the wrong conclusion have already been publicly exposed and criticized by independent scientists and toxicology experts⁴.

The fact that the industry has to provide the tests for its own products is already problematic and casts doubt on the validity and impartiality of the data. On the top of that the Pesticide Unit of the European Commission is known to favour pesticide industry data even when they contain vital evidence gaps that if included might not permit approval. In a recent verdict, the European Ombudsman criticized the Directory of Health (DG Sante) for maladministration, authorising pesticides with data gaps in their evaluation that may have serious consequences for human and environmental health⁵. Having the European Commission permitting data gaps and approving the erroneous assessment of the industry is completely unacceptable.

¹ <http://www.iarc.fr/en/media-centre/iarcnews/pdf/MonographVolume112.pdf>

² <http://www.pan-europe.info/press-releases/2015/11/efsa's-un-scientific-opinion-glyphosate-not-carcinogen>

³ http://www.pan-germany.org/download/Analysis_EFSA-Conclusion_151201.pdf

⁴ http://www.efsa.europa.eu/sites/default/files/Prof_Portier_letter.pdf

⁵ <http://www.ombudsman.europa.eu/press/release.faces/en/64156/html.bookmark>

But this is not the end of the story, as the carcinogenicity of glyphosate appears to be only the tip of the iceberg for this compound. Chronic exposure to low doses of glyphosate has been associated with toxic effects in reproduction (birth defects) and teratogenicity, early puberty, neuron degeneration observed in Parkinson disease, autism, problems of the gastrointestinal track, among others⁶. Glyphosate is also linked to crop diseases, pest resistance, soil and ecosystem degradation⁷.

Unfortunately the regulatory risk assessment that exposes mainly adult animals to high sub-lethal doses of pesticides, fails to detect these low-dose effects. This was exactly the warning of the group of fourteen experts that published an article highlighting that current safety assessments of glyphosate-based herbicides are based on outdated science⁸.

The use of glyphosate is increasing globally, not only in our crops, orchards and vineyards but also in our parks, gardens, train tracks, cemeteries and golf courses. Glyphosate food residues have doubled in the last 3 years, and traces of glyphosate were recently detected in human urine of consumers⁹, beer samples and even organic products.

Taking into account all the adverse effects related to glyphosate exposure and the lack of scientific consensus between regulators and independent scientists, we are asking you to put human health and the environment as a priority and demand an urgent review of the matter to prevent the re-authorisation of this harmful chemical in Europe.

Yours faithfully,

XXX

⁶ http://www.i-sis.org.uk/pdf/Glyphosate_research_papers_compiled_by_Dr_Alex_Vasquez_and_Dr_Eva_Sirinathsinghi.pdf

⁷ http://www.i-sis.org.uk/pdf/Glyphosate_crop_interactions_reviewed_by_Dr_Don_Huber.pdf

⁸ <http://ehjournal.biomedcentral.com/articles/10.1186/s12940-016-0117-0>

⁹ <http://www.omicsonline.org/open-access/detection-of-glyphosate-residues-in-animals-and-humans-2161-0525.1000210.pdf>