



12th May 2016

Sent by email only

To: Ministers of Agriculture, Environment, Health and Food Safety of 28 EU Member States and Members of the Standing Committee on Plants, Animal, Food and Feed of the European Commission

Subject: The renewal of the authorisation of glyphosate violates the European Regulation (EC) No. 1107/2009 on pesticides

With regard to the imminent vote on the reauthorisation of the herbicide ingredient glyphosate, we, the undersigned 39 European organisations are writing to you to emphasize that the International Agency for Research on Cancer (IARC) of the World Health Organisation (WHO) categorized glyphosate as a “**probably carcinogenic to humans**” in 2015. In humans, exposure to glyphosate caused an increased incidence of a malignant lymphoma (Non-Hodgkin-Lymphoma) and in animal studies, it caused increased incidences for different tumour types, including lymphoma.

Therefore, it is “probable” that the reauthorization of glyphosate in Europe will increase the rate of cancers, which are correlated to the use of glyphosate-containing pesticides and most likely to the consumption of glyphosate-contaminated food.

The assessment of glyphosate as carcinogenic by the IARC is based on a transparent and thorough evaluation of the best scientific literature available by 17 scientists enlisted by the IARC who have no conflicts of interest.

Glyphosate pollutes our environment, our food, and our bodies. A study published in March 2016 revealed that glyphosate was found in the urine of more than 99 percent of those 2.000 Germans who enrolled for this study.

Further, the use of glyphosate contributes to a massive loss of plant biodiversity, which has far reaching consequences for the food web, for pollinators and birds in particular.

Therefore, we ask you to vote against the reauthorisation of the pesticide active ingredient glyphosate on the 18th and 19th of May, 2016.

The IARC concluded that there is sufficient evidence in experimental animals, combined with limited evidence in humans for the carcinogenicity of glyphosate and strong evidence in genotoxicity studies. The human assessment is based on 14 epidemiological case-control studies concerning the “Non-Hodgkin-Lymphoma” (NHL) evaluated by the experts of IARC. A meta-analysis of these studies by the epidemiologist Prof. Eberhard Greiser, University Bremen, Germany, revealed that people exposed to glyphosate had a 45 percent higher risk of suffering from NHL, a malignant tumour of lymphatic tissues. NHL is fatal in more than half of the cases.

The EU regulations provide for an authorization of pesticides only when specific conditions are met.

The industry needs to ensure “that substances or products produced or placed on the market do not have any harmful effect on human or animal health or any unacceptable effects on the environment.” (Regulation (EC) No. 1107/2009, recital 8).

According to the applicable exclusion criteria, pesticide active ingredients shall not be approved if they show carcinogenic effects in animal studies or humans (Regulation (EC) No. 1107/2009, Article 4.1; Annex II, section 3.6.3).

“In particular, when granting authorisations of plant protection products, the objective of protecting human and animal health and the environment should take priority over the objective of improving plant production.” (Regulation (EC) No. 1107/2009, recital 24)

In an open letter 94 international scientists from 25 different countries raised their strong concerns against the hazard assessment by the German Federal Institute of Risk Assessment (BfR), acting as a Rapporteur Member State for the European Commission, and the European Food Safety Authority (EFSA), calling it “scientifically unacceptable”, “fundamentally flawed” and “misleading”.

Detailed statements of experts annexed to this letter show that these authorities disregarded relevant OECD Guidelines in their cancer risk assessment and misinterpreted scientific studies revealing cancer incidences in humans or laboratory animals. These issues have been reported as a legal offence in three EU Member States and at the European Anti-fraud office (OLAF) by several NGOs and politicians.

In accordance with the Regulation (EC) No. 1107/2009, **a reauthorisation of the active ingredient glyphosate should be illegal in the European Union.**

The renewal of the authorisation of glyphosate will have harmful effects on human and animal health. Moreover, the victims from exposure to glyphosate and their relatives will seek responsibility for these foreseeable health damages.

For all of the above reasons, we urgently call on you to respect the precautionary principle and refuse the renewal of the authorization of glyphosate.

Yours sincerely,



Leonore Gewessler

Director GLOBAL 2000-FOE Austria



F. Veillerette

President of PAN Europe

Annexes:

- Evidence in animal testing_PeterClausing
- Human evidence_EberhardGreiser
- Differences between IARC and EFSA_Portier et al
- Statement for the German parliament_IvanRusyn
- Contradictions in the RAR

Also on behalf of the organisations (in alphabetical order):

ÄrztInnen für eine gesunde Umwelt (Doctors for the Environment Austria)
Asociación Española de Educación Ambiental - Spain
Bürgerinitiative Landwende - Germany
Centre for sustainable Alternatives (CEPTA) Slovakia
Corporate Europe Observatory - Europe
Earth Thrive - UK
Ecologistas en Acción - Spain
Environment and Health. Capacity building for Decision Making (UOA)- Greece
European Coordination Via Campesina
European Environmental Bureau
Fédération Inter-Environnement Wallonie - Belgium
Forschungs- und Dokumentationszentrum Chile-Lateinamerika
Friends of the Earth Czech Republic
Friends of the Earth Europe
Friends of the Earth Germany
Friends of the Earth UK
Fundación Alborada - Spain
Fundación Vivo Sano - Spain
Generation Futures -France
Global2000 - Austria
GMWATCH
Greenpeace Europe
Health and Environmental Alliance
Magyar Természetvédők Szövetsége- Friends of the Earth Hungary
Nature & Progrès Belgique
Pesticide Action Network Europe
Pesticide Action Network Germany
Pesticide Action Network Italy
Pesticide Action Network UK
Polish Ecological Club - Poland
Quercus- Portugal
Selena Akcija- Friends of the Earth Croatia
Slow Food Europe
SumOfUs
The Danish society for Nature Conservation
The Ecological Council - Denmark
International federation of trade unions (IUF)
Velt- Belgium
WemoveEU - Europe