



March 16, 2016, Brussels

Dear National representative on the Standing Committee on Plant Animal Food and Feed (PAFF),

The European Commission has asked you to submit amendments to their proposed renewal of the glyphosate marketing authorisation in the EU, after postponing the vote last week due to lack of agreement.

As Health and Environment Alliance (HEAL)¹, a leading European non-profit organisations with over 70 member organisations working for better health through a healthier environment, we ask you to consider the following procedural issues and public health concerns, both for your own amendment(s) as well as for the position you take on any suggested amendments and the overall (amended) proposal for renewal of glyphosate's authorisation. ***In brief, we urge you to oppose the renewal until the below conditions are met.***

You are no doubt aware that the German (BfR) draft assessment and EFSA's peer review have been strongly criticized by nearly 100 scientists, who maintain that the EFSA conclusion is based on a flawed assessment. The current profound disagreements on the carcinogenicity of glyphosate between IARC and EFSA are a serious problem, given that regulation 1107/2009 prohibits active substances that are carcinogenic. Moreover, Glyphosate does not yet have an EU harmonised classification, and this process will probably be completed until 2017. It is scientifically questionable to completely disregard the IARC position and criticisms and assume that EFSA is entirely correct. Procedurally, it is pre-emptive to give a full renewal to glyphosate as if the EU harmonised classification will necessarily find glyphosate is not a carcinogen 1A or 1B.

Equally, you will be familiar with the stipulation in 1107/2009 that prohibits active substances which have endocrine disrupting properties which may harm human health. EFSA stated in its peer-review that **“an endocrine-mediated mode of action could not be ruled out”**. Another recent scientific publication noted that the current models and data from the biological sciences predict that glyphosate disrupts endocrine signalling systems in ways that affect the hormones of vertebrate animals². Hence, although the criteria to identify endocrine disrupting properties have not yet been finalised, it seems premature to assume that glyphosate would not come under this prohibition. The European Commission has indicated that it will propose the criteria before the summer, meaning its approval procedure would be completed before the end

¹ The Health and Environment Alliance (HEAL) is a leading European not-for-profit organisation addressing how the environment affects health in the European Union (EU).

With the support of more than 70 member organisations, HEAL brings independent expertise and evidence from the health community to different decision-making processes.

Our broad alliance represents health professionals, not-for-profit health insurers, doctors, nurses, cancer and asthma groups, citizens, women's groups, youth groups, environmental NGOs, scientists and public health research institutes. Members include international and Europe-wide organisations as well as national and local groups.

Website: www.env-health.org. Follow HEAL on Facebook and Twitter [@HealthandEnv](#) [@EDCFree](#) and [@CHM_HEAL](#)

² <http://ehjournal.biomedcentral.com/articles/10.1186/s12940-016-0117-0>

of this year (earlier than the harmonised classification for carcinogenicity). Therefore, a renewal of the glyphosate authorisation should not be considered before the criteria are available.

Finally, we must point to the increasing exposure of Europeans to glyphosate, which makes the above two unfinished procedures on glyphosate's cancer causing and endocrine disrupting properties very disturbing. Last week a study showed traces of glyphosate detected in 99.6% urine samples of 2000 German consumers, and three-quarters of these samples tested above the existing maximum permissible limit. This trend could be similar across Europe. Regulation 1107/2009 states that particular attention be paid to the protection of vulnerable groups of the population, including pregnant women, infants and children (Recital 8). At the same time, more and more national cancer and medical groups, for example from Portugal, France, Belgium, UK and Malta, are calling for greater protection of our health.

In conclusion, in the absence of certainty that glyphosate is not carcinogenic and not endocrine disrupting, and given the high level of exposure of vulnerable groups, a renewal of the glyphosate license does not respect the law. We therefore urge you to oppose renewal, until

- the EU classification process for glyphosate has been completed
- glyphosate has been formally assessed for its endocrine disrupting properties according to the forthcoming criteria
- Advise for an immediate **ban on the uses that result in the greatest public and worker exposure**, either directly or through residues in food, such as private individuals in the non-agriculture sector.

We look to you to contribute actively towards the primary prevention of cancer and other diseases related to endocrine disruption, and to ensure that the existing law is upheld to the fullest.

Sincerely,

A handwritten signature in black ink, appearing to read 'Génon K. Jensen'. The signature is stylized with large, sweeping loops.

Ms. Génon K. Jensen

Executive Director, Health & Environment Alliance (HEAL)