



BRUSSELS, 4th NOVEMBER 2021

Julien Denormandie
French Minister responsible for agriculture and food

Barbara Pompili
French Minister responsible for the ecological transition

RE: France's position regarding the renewal of the pesticide active substance glyphosate

Dear Minister Pompili,
Dear Minister Denormandie,

On behalf of the Health and Environment Alliance (HEAL), the Association of European Cancer Leagues, and La Ligue contre le Cancer, we are writing to you regarding France's position in the context of the renewal process of the pesticide active substance glyphosate, of which current market license expires on 15th December 2022.

France is co-rapporteur in the European assessment of the renewal dossier together with The Netherlands, Sweden and Hungary, which are jointly referred to as the Assessment Group on Glyphosate (or AGG). According to the recently released AGG preliminary conclusions regarding the renewal of the substance, "*glyphosate meets the approval criteria for human health as laid down in Regulation (EC) No 1107/2009 and its amendments for the approval as an active substance to be used in plant protection products*"¹.

France's participation to the AGG suggests that the French authorities fully support this conclusion and the absence of unacceptable risks for human health. This is a surprise for our organisations and respective constituencies for the following reasons:

- Throughout the last assessment process, France supported the non-renewal of the active substance due to concerns for human health and subsequently voted against the reapproval in November 2017²;
- In 2017, French President Macron himself publicly stated that he requested the Government to take steps in order to get glyphosate banned within three years from the date of the European renewal³;
- France's current position as part of the AGG appears to contradict the conclusions of its leading public

¹ AGG preliminary conclusions, https://ec.europa.eu/food/system/files/2021-06/pesticides_aas_agg_report_202106.pdf , 15 June 2021

² <https://www.actu-environnement.com/ae/news/rapport-premier-ministre-plan-sortie-glyphosate-produits-substitution-29710.php4> ; https://www.lemonde.fr/europe/article/2017/11/27/la-commission-europeenne-autorise-l-utilisation-du-glyphosate-jusqu-en-2022_5221037_3214.html; <https://www.lesoir.be/123522/article/2017-11-09/glyphosate-nicolas-hulot-fier-que-la-france-tienne-bon-bruxelles>

³ French President Emmanuel Macron, « J'ai demandé au gouvernement de prendre les dispositions nécessaires pour que l'utilisation du glyphosate soit interdite en France dès que des alternatives auront été trouvées, et au plus tard dans trois ans. #MakeOurPlanetGreatAgain », Official Twitter account, 27 November 2017, last accessed 5th August 2021

health institute INSERM in relation to the health impacts of glyphosate. Indeed, the recently updated INSERM state of the science concerning associations between exposure to pesticides and health outcomes⁴. The collective expert report points to scientific evidence in support of a moderate presumption of a link between glyphosate exposure and an increased risk of non-hodgkin lymphoma as well as a suggested excess of risk for multiple myeloma and leukaemia (weak presumption). It highlights that, while the available mutagenicity tests are generally negative, genotoxicity tests are generally positive, which is found to be consistent with an induction of oxidative stress. Experimental carcinogenesis studies in rodents, although not consistent, also show an increase of cancer incidents at high doses. Finally, the report points to the relevance of other mechanisms of toxicity (such as intergenerational effects and disruption of microbiota composition and function) - that are currently not fully investigated - in the context of regulatory assessments.

As you are well aware, the process that led to the 2017 renewal of glyphosate gave rise to significant scientific and political controversies and the integrity of the process was heavily questioned⁵. This included revelations of concerning industry-coordinated efforts to undermine the independent scientific evidence that led to the conclusion by the International Agency for Research on Cancer (IARC) that glyphosate is a probable carcinogen as well as of a copy-paste of major sections of the renewal dossier directly from the industry's application⁶. Furthermore, a recent independent scientific analysis of the dossier filed by industry applicants at the time further found that only two out of the 53 industry-funded genotoxicity studies could be considered scientifically 'reliable'⁷. In this context, rapporteur Member States for the current renewal discussions, including France, have a special responsibility to guarantee the scientific excellence and independence of this process against the occurrence of any such malpractices.

Based on the above, our organisations and respective health constituencies would like to express their concerns about France's support for the recent AGG conclusions, which suggest that glyphosate meets the approval criteria for human health. We fail to understand the reasons and scientific justification for such a position. If confirmed the latter would constitute a major u-turn in terms of the French authorities' earlier judgement as regards the human health risks of glyphosate.

Far from having weakened, the scientific evidence that already supported concerns about the substance carcinogenicity among other health risks in 2017 has been further reinforced and remains significant in the context of the ongoing renewal discussions. It is also worth noting that the monograph on glyphosate from IARC – which remains the gold standard for carcinogenicity assessment – has never been modified since its first publication in 2015. Meanwhile, the world renown Ramazzini institute has initiated the most comprehensive toxicity study ever carried out on glyphosate and the initial results also support a cautious approach to the reassessment of the substance⁸.

We therefore call on you to clarify publicly the position of the French authorities in relation to the health risks posed by glyphosate as well as the scientific evidence supporting it.

⁴ INSERM, « Pesticides et effets sur la santé : Nouvelles données », 30 June 2021, <https://presse.inserm.fr/publication-de-l'expertise-collective-inserm-pesticides-et-effets-sur-la-sante-nouvelles-donnees/43303/>; <https://www.inserm.fr/wp-content/uploads/2021-06/inserm-expertisecollective-pesticides2021-synthese.pdf>

⁵ European Parliament resolution of 16 January 2019 on the Union's authorisation procedure for pesticides (2018/2153(INI)), PEST Committee report, https://www.europarl.europa.eu/doceo/document/TA-8-2019-0023_EN.html?redirect

⁶ <https://www.europeanpressprize.com/article/monsanto-papers/>; <https://theintercept.com/2019/08/23/monsanto-republicans-cancer-research/>

⁷ <https://www.env-health.org/revealed-eu-glyphosate-assessment-was-based-on-flawed-science/>

⁸ <https://glyphostatstudy.org/fr/about-us/>. The preliminary results of the study were presented in a webinar hosted by HEAL on 28th June 2021, <https://www.env-health.org/webinar-the-global-glyphosate-study-the-most-comprehensive-study-on-worlds-most-used-pesticide-ever/>

We thank you for considering our letter and would welcome the opportunity to exchange on this important matter with you at your earliest convenience.

Yours sincerely,

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Health and Environment Alliance

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The Health and Environment Alliance (HEAL) is the leading not-for-profit organisation addressing how the environment affects human health in the European Union (EU) and beyond. HEAL works to shape laws and policies that promote planetary and human health and protect those most affected by pollution, and raise awareness on the benefits of environmental action for health.

HEAL's over 90 member organisations include international, European, national and local groups of health professionals, not-for-profit health insurers, patients, citizens, women, youth, and environmental experts representing over 200 million people across the 53 countries of the WHO European Region.

As an alliance, HEAL brings independent and expert evidence from the health community to EU and global decision-making processes to inspire disease prevention and to promote a toxic-free, low-carbon, fair and healthy future.

HEAL's EU Transparency Register Number: 00723343929-96

The Association of European Cancer Leagues (ECL) is the only not-for-profit organisation that unites, supports and represents national and regional cancer leagues across the WHO European region.

ECL provides a voice and forum for cancer leagues to collaborate and share knowledge, primarily in the areas of cancer prevention, access to medicines and patient support, and create opportunities to advocate for these issues at the EU level and beyond.

ECL's 30 member organisations are cancer societies operating across the whole cancer continuum and patient pathway. Cancer leagues are the main resource for the public for cancer control information and services. From Iceland to Israel, they contribute to preventing and fighting cancer by raising awareness and educating people about cancer, investing in research and providing support to cancer patients and their families during and after treatment.

ECL's member leagues together employ more than 8,000 people and over 300,000 volunteers. They spend more than €750 million every year to fight cancer and represent over 570 million citizens. ECL's EU Transparency Register Number: 19265592757-25

A PROPOS DE LA LIGUE CONTRE LE CANCER

1er financeur associatif indépendant de la recherche contre le cancer, la Ligue contre le cancer est une organisation non-gouvernementale indépendante reposant sur la générosité du public et sur l'engagement de ses militants. Forte de près de 600 000 adhérents et 11 200 bénévoles, la Ligue est un mouvement populaire organisé en une fédération de 103 Comités départementaux. Ensemble, ils luttent dans quatre directions complémentaires : chercher pour guérir, prévenir pour protéger, accompagner pour aider, mobiliser pour agir. Aujourd'hui, la Ligue fait de la lutte contre le cancer un enjeu sociétal rassemblant le plus grand nombre possible d'acteurs sanitaires mais aussi économiques, sociaux ou politiques sur tous les territoires. En brisant les tabous et les peurs, la Ligue contribue au changement de l'image du cancer et de ceux qui en sont atteints.

Pour en savoir plus : www.ligue-cancer.net