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BRUSSELS, 12 SEPTEMBER 2023

To:
Member States representatives,
Standing Committee on Plants, Animals, Food and Feed

Subject: September 15th SCoPAFF meeting: support the non-renewal of glyphosate's market license

Dear Member States' representatives,

We, the undersigned health groups, are writing to you ahead of the **Standing Committee on Plants, Animals, Food and Feed (SCoPAFF) meeting due to take place on 15th September in order to discuss the renewal process of active substance glyphosate** [1]. During this meeting, we ask you to take into account the existing **scientific evidence of the serious adverse effects associated with the exposure to glyphosate and glyphosate-based products for human health** and to **support a non-renewal of the active substance's market license on this basis**.

We are extremely concerned at EFSA's recent conclusion that glyphosate does not pose unacceptable risks for human health despite important data gaps in the industry renewal dossier [2] and in contradiction with findings from independent scientific literature. Considering glyphosate's wide use and the ubiquitous population exposure to the substance, we cannot understand that the European Commission is considering renewing the market license of the substance, which puts the health of millions of citizens at risk over the long-term through continued exposure.

In 2015, the World Health Organization's International Agency for Research on Cancer (IARC) concluded that glyphosate is a potential carcinogen based on an extensive independent peer-review of all the scientific evidence available [3]. These carcinogenicity concerns were echoed in a recent review on the health impacts of pesticides carried out by France's national institute for public health INSERM [4]. In 2022, a HEAL report [5] showed that studies provided by pesticide companies as part of the current renewal dossier indicate clearly a potential for glyphosate's carcinogenicity. HEAL has raised those concerns during meetings of the Risk Assessment Committee (RAC) at the European Chemical Agency (ECHA) earlier this year [6]. Independent experts have also raised the alarm on the remaining concern of carcinogenicity based on industry data and they have recently alerted about the further need for EU official experts to reconsider the data on oxidative stress in relation to carcinogenicity [7].

Besides carcinogenicity concerns, independent scientific literature has associated glyphosate exposure to numerous serious health conditions, including among others kidney disease, potential contributions to the development of Parkinson's disease, impacts for the human developmental and the reproductive systems, as well as other transgenerational effects [8, 9, 10, 11].

Based on the above, it is clear that there is significant independent scientific evidence pointing to glyphosate's serious long-term health effects, while EFSA itself has highlighted important data gaps in the renewal dossier, including regarding the assessment of impurities, the conclusion of the consumer dietary risk assessment, the assessment of risks to aquatic systems - which constitute critical elements for the finalising of the risk assessment

and are left to your and the Commission's appreciation.

The primary objective of the EU Regulation on plant protection products (EC 1107/2009) is to protect human health and the environment, notably through the non approval of substances presenting unacceptable risks for humans and wildlife [12]. Independent science points to glyphosate meeting such unacceptability criteria.

Finally, through the Budapest declaration recently agreed at the seventh WHO ministerial conference on environment and health, all EU Member States committed to step up action to reduce the health impacts of pollution, through addressing both established and emerging environmental risk factors [13]. Based on the available scientific evidence about the harm of glyphosate, living up to the promises of this declaration is incompatible with the prolonged market license of the substance.

For these reasons, at the upcoming SCoPAFF meeting on 15th September, we ask you to put health first and to support the non-renewal of active substance glyphosate.

Yours sincerely,

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On behalf of:

International Society of Doctors for Environment (ISDE) Italy
Mutualités Libres/Onafhankelijke Ziekenfondsen (MLOZ)

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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.

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