



Subject: Urgent call to protect European citizens by opposing glyphosate renewal in light of leukaemia risk

Brussels, 2nd November 2023.

Dear Permanent Representative to the European Union,

With this letter the undersigned Civil Society Groups of the [Stop Glyphosate coalition](#) call upon you to oppose the Commission's proposal for a 10-year renewal of glyphosate's approval. Compelling new scientific evidence has emerged, demonstrating that glyphosate-based herbicides (GBHs) can cause leukaemia in rats, even at low doses deemed safe by EU regulatory authorities. In light of this new evidence, we urge you to take a firm stand to protect the health of European Citizens by voting against the renewal proposal for glyphosate and requesting its non-renewal at the upcoming Appeal Committee on November 16th.

On the 25th of October, the [first carcinogenicity data](#) from the Global Glyphosate Study (GGS), a multi-institutional international toxicological study, [was presented](#) at an international scientific conference. The findings show that low doses of GBHs, which were wrongfully assumed to cause no effects during the EU assessment - caused cases of leukaemia in rats below 1 year of age, following prenatal and early life exposures. The data reveal that half of the leukaemia deaths seen in rats occurred between 21 weeks (comparable to about 16 years in humans) and one year of age (comparable to roughly 40 years in humans). One of the GBHs tested in the GGS was the representative formulation BioFlow (MON 52276), which is currently authorised in all EU Member States and for which the European Food Safety Authority (EFSA) had recently concluded there were "no critical areas of concern" - meaning that it fulfils all the safety criteria for human health and the environment to be approved.

The findings of the GGS are extremely concerning as they add to the already existing evidence of the substance's carcinogenic potential, as we explained in our [previous open letter](#). They underscore that glyphosate's carcinogenicity and genotoxicity potential has simply not been properly assessed and that crucial evidence has not been acknowledged in the EU assessment [1]. Throughout the entire re-assessment of glyphosate, NGOs, trade unions and independent scientists have repeatedly alerted about important incoherences and shortcomings in its EU scientific evaluation. Regarding the representative formulation "Bioflow", existing scientific literature points to its genotoxic potential and although EFSA has

reported data gaps and indicated potential genotoxicity of certain ingredients, no long-term toxicity or carcinogenicity study has been carried out on this representative formulation by the applicants.

Considering the GGS data, it is beyond comprehension how a decision on the safety of the representative formulation can be justified in the absence of a long-term toxicity study from the dossier. According to article 4(5) from Regulation (EU) 1107/2009 and, as emphasised by the European Court of Justice ([Case C-616/17](#)), products and active substances must be thoroughly assessed to show they cause no long-term toxicity and/or carcinogenicity.

Unfortunately, the carcinogenicity of glyphosate is only the tip of the iceberg in relation to the health impacts of glyphosate herbicides. Exposure to glyphosate and GBHs has been linked to neurotoxicity [2], autism spectrum disorders in children exposed from prenatal age [3], amyotrophic lateral sclerosis [4] and Parkinson's disease in adults [5]. It has also been linked to endocrine disruption [6] and alternations in the microbiome [7]. Exposure to glyphosate can also lead to toxicity in a wide range of terrestrial [8] and aquatic non-target species [9], potentially causing serious [impacts on biodiversity](#). To our concern, all these important harmful effects were not considered as critical areas of concern by EFSA in its conclusion.

Taking into account the widespread use and exposure to glyphosate-based products, neglecting any reported adverse effects poses an unacceptable health risk to both farm workers and the general population.

In light of these worrying recent findings, we call upon you to ask the Commission to withdraw its proposal to renew glyphosate and immediately revoke glyphosate's licence. Evidently, glyphosate does not meet the approval criteria laid down in Regulation (EU) 1107/2009, according to which pesticide active substances, pesticide products and their residues placed on the market should not be harmful to humans, animals and the environment. In case of uncertainty, Member States and the Commission are entitled to evoke the precautionary principle, to ensure the high level of protection required by the EU law.

If the Commission remains resolute in upholding its proposal despite the alarming GSS findings, you bear the responsibility to safeguard human health and the environment by opposing the ten-year renewal of glyphosate within the Appeal Committee. In this pivotal moment, we call upon you to push for the non-renewal of glyphosate, for the protection of farmers, agricultural workers and the public hangs in the balance.

Thank you in advance for your consideration.

Yours sincerely,
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Head of Science and Policy, PAN Europe

On behalf of:

Bündnis für eine enkeltaugliche Landwirtschaft e.V.

CBG - Coordination against BAYER-Dangers

Corporate Europe Observatory (CEO)

Ecologistas en Acción

European Federation of Trade Unions in the Food, Agriculture and Tourism- EFFAT

Foodwatch International

Friends of the Earth Europe

Génération Futures

Gibanje zdrava družba

Health and Environment Alliance (HEAL)

International Society of Doctors for the Environment- Italia

Pesticide Action Network (PAN) Europe

Pesticide Action Network (PAN) Germany

Pesticide Action Network (PAN) Netherlands

Parkinson Vereniging

Umweltinstitut München E.V.

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ENDNOTES

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