



Brussels, 09/10/2023

Urgent call to take a stand for human health and the environment: Say 'No' to 10 more years of glyphosate.

Dear Permanent Representative to the European Union,

In this letter, the Stop Glyphosate Coalition would like to express its deep concerns regarding the EU's intention to extend the use of glyphosate herbicides for another decade, in light of the significant scientific evidence indicating potential harm. On October 12-13th, Member States are invited to vote on the European Commission's Implementing Regulation proposal at the Standing Committee on Plants, Animals, Food and Feed meeting. We strongly urge you to **oppose the Commission's proposal, as its terms are neither acceptable nor consistent with the commitment to ensuring a high level of protection of human health and the environment**, as stipulated in the EU Regulation on pesticides (EC) 1107/2009. You may already be aware that a significant number of Member States, national institutions, and parliaments have raised concerns or voiced outright opposition to the proposal, as well as to the assessment of the ECHA and EFSA

Given that glyphosate is the most widely used herbicide in Europe, with [widespread exposure](#) among humans, including children, and is [ubiquitous in the environment](#), it is crucial that in the light of evidence demonstrating its toxicity strict measures are taken. Under EU law, pesticides that **may cause harm should not be authorised**, and in case of uncertainty the precautionary principle should be implemented.

As it stands, the Commission's proposal entails the renewal of the EU approval of glyphosate for 10 years, **with hardly any restrictions to minimise the use of glyphosate** included in the text apart from pre-harvest desiccation, which is already restricted in certain Member States. The Commission has only added **non-binding recommendations** of use, which are **insufficient to guarantee implementation and therefore are bound to fail to ensure protection of the health of workers and residents of agricultural zones, including children, as well as of the environmental ecosystems and biodiversity**. The Commission is simply offloading the responsibility for risk management onto the Member States.

The content of the proposal is extremely alarming in light of the considerable amount of scientific knowledge on glyphosate's toxicity, both through independent research, as well as through industry data. Scientific evidence shows that glyphosate can potentially cause carcinogenicity and genotoxicity, as well as oxidative stress, a mechanism, which may result in DNA damage and is linked to cancer. It also disrupts people's microbiome and potentially the endocrine system, it is neurotoxic and massively harms biodiversity. Number of civil society organisations have established that the EFSA and ECHA have discarded hundreds of independent scientific studies that demonstrate such harm, while EU agencies keep giving priority to industry data.

Member state authorities, ECHA and EFSA have downplayed the existing evidence [from animal studies](#) and [epidemiology studies](#) and the evidence that glyphosate [may cause DNA damage in certain organs](#), which indicate the potential of glyphosate to cause cancer, according to the EU (CLP) and international guidelines (OECD Guidance document 116). Renowned independent institutes such as the [International Agency for Research on Cancer](#), the [French Health Institute Inserm](#) and the [Belgian Health Council](#) have concluded that based on all the available evidence a probable link between glyphosate exposure and



cancer development is undeniable. Regarding the neurotoxicity potential of glyphosate, EFSA acknowledges that there are indications that glyphosate-based herbicides cause neurodevelopmental toxicity, but wrongfully did not identify this as a critical area of concern, which could lead to non-approval. This is worrying, as existing studies show that glyphosate exposure has been linked to [autism spectrum disorders](#) in children exposed from prenatal age, [amyotrophic lateral sclerosis](#) (ALS) and [Parkinson's disease](#) in adults. Yet, the studies submitted by the companies are insufficient to examine such long-term neurodegenerative effects. EFSA also acknowledges the impact of glyphosate and glyphosate-based products on microbiome and the possible consequences on health, but **shockingly stated that in the absence of standardised protocols conclusions cannot be drawn.**

Additionally, a big volume of scientific literature shows that glyphosate may adversely affect the environmental species (plants, bees, fish, frogs, small mammals etc) and **biodiversity**, and therefore, the active substance should not be approved according to Regulation 1107/2009. EFSA's peer review acknowledges some of these adverse effects but the Commission has passed the responsibility to Member States.

The Commission's proposal not only violates the provisions of the EU law, but is also a profound disregard of the legitimate concerns voiced by countless Europeans who are exposed to this substance and stand firmly against its renewal. As demonstrated by a [recent IPSOS poll](#) spanning six EU countries—Denmark, France, Germany, Poland, Romania, and Spain—**only a mere 14% of citizens express support for the prolonged use of glyphosate.** In stark contrast, a staggering two-thirds (62%) of respondents advocate for the complete ban of glyphosate throughout Europe.

This decision is taking place while the EU has committed through the European Green Deal to move away from our current agricultural and reduce dependency to synthetic pesticides by cutting down in half their risk and use by 2023 and giving priority to non-chemical and sustainable alternatives.

It is unacceptable that the current proposal intends to reauthorize glyphosate for 10 years, perpetuating a destructive agricultural model that the EU has already decided to move away from, and overlooking the plethora of toxicity studies, particularly from independent literature, indicating the toxic potential of glyphosate and the representative formulation. The Stop Glyphosate Coalition urges you to vote against the Commission's proposal. Taking a resolute stand against the 10 year glyphosate renewal is not simply an option, it is rooted in the provisions of the EU law and the precautionary principle. Your vote on October 13th will be a powerful act demonstrating that you prioritize the well-being of farmers, agricultural workers, the public and our environment, over commercial interests. Your opposition would compel the Commission to present an improved proposal.

Thank you in advance for your consideration,

On behalf of the Stop Glyphosate Coalition

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