



The authorities' documents themselves belie BfR's statement. For instance, in the past, BfR and ECHA explicitly contended that there were no other studies, except for the Stout and Ruecker (1990) study, that showed an increase in liver cell tumours:

**BfR:** "Based on the lack of increased liver tumour rates in all other long-term/carcinogenicity studies ..."<sup>5</sup>

**ECHA:** "No significant increases in glyphosate-related liver tumours were reported in the other long-term studies in rats."<sup>6</sup>

This proves that the authorities overlooked the significant increase of liver cell tumours in the Brammer (2001) study identified by Prof Portier. How can we trust the authorities when they claim that they noticed the increases in the remaining six tumour incidences, but did not report them?

Previously BfR, in August 2015, was forced to admit that it had overlooked tumour effects because "initially" it relied too much on the statistical evaluation provided in industry's own study reports.<sup>7</sup>

BfR, EFSA and ECHA repeatedly take recourse to the argument that statistical significance is not the same as biological relevance. But they use it to make blanket dismissals of the relevance of statistically significant findings. This is an outrageous abuse of this argument. And it is in strong contradiction to the fact that in concrete cases the statistically significant findings are supported instead of being rebutted by considerations of biological relevance. This, for instance, applies to malignant lymphoma and kidney tumours.<sup>8</sup>

In contributions to peer-reviewed journals in February and June 2017, BfR and EFSA were invited to explain their position regarding the biological relevance of tumour increases in the context of a scientific debate.<sup>9</sup> To date they have not done so. As long as this situation persists, the concerned public and scientific community can only assume that BfR's and EFSA's repeated calls for a "scientific debate" are not sincere but are a tactical manoeuvre.

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<sup>5</sup> BfR: CLH-Report (2016), p. 65

<sup>6</sup> ECHA Opinion (2017), p. 34.

<sup>7</sup> Addendum to Renewal Assessment Report on Glyphosate (2015), p. 36.

<sup>8</sup> Peter Clausing (2017). Glyphosate and cancer: Authorities systematically breach regulations. Published by GLOBAL 2000 (Friends of the Earth Austria). [http://www.gmwatch.org/files/GLO\\_02\\_Glyphosat\\_EN.pdf](http://www.gmwatch.org/files/GLO_02_Glyphosat_EN.pdf)

<sup>9</sup> Clausing, P. (2017): Krebsgefahr durch Glyphosat: Der „Weight of Evidence Approach“ des BfR. *Umwelt – Hygiene – Arbeitsmedizin* 22: S. 27-34; Portier, C.J. und Clausing, P. (2017): *Archives of Toxicology*, DOI 10.1007/s00204-017-2009-7

