

Commissioner Stella Kyriakides
Directorate-General for Health and Food Safety
European Commission
B-1049 Brussels - Belgium

December 14th 2022

Subject: Take the side of European people and ban glyphosate

Dear Commissioner Kyriakides,

We, the undersigned 28 environmental and health groups, urge you to immediately ban glyphosate from the European market on the basis of the overwhelming amount of scientific evidence showing that glyphosate, and glyphosate-based products, likely cause serious diseases to humans and are toxic for the environment and its species.

We are deeply concerned about the Commission's decision to extend the glyphosate license for yet another year. In 2017 the [European Parliament backed a full ban](#) on glyphosate-based herbicides by December 2022 and supported immediate restrictions on the use of the substance. The Pesticides Regulation (EC) 1107/2009 aims to provide a high level of protection for humans, animals and the environment. In that respect, the current scientific and technical knowledge, as well as the monitoring data that we present in this letter, reveal that the approval criteria laid down in the Article 4 of Regulation 1107/2009 are not satisfied. Therefore, we urge you to withdraw glyphosate's market license.

Glyphosate has been linked to cancer and genotoxicity in humans by the International Agency for Research on Cancer (IARC) of the World Health Organisation (WHO)¹ and recently by the French institute INSERM². It was also linked to chronic toxicity in aquatic species by the Risk Assessment Committee of European Chemicals Agency (ECHA)³, whereas the European Food Safety Authority (EFSA) has identified risks to wild non-target terrestrial vertebrates following exposure to glyphosate-product (representative formulation)⁴.

Moreover, the public scientific literature linking glyphosate exposure to serious diseases and environmental damage keeps increasing. For example, in addition to its carcinogenicity potential, recent studies show that glyphosate and glyphosate products can be [neurotoxic](#) and contribute to the development of [Parkinson's disease](#), can cause kidney disease⁵ and disrupt the human and animal microbiome⁶. Maternal exposure to glyphosate has also been linked to spontaneous deliveries [with shortened gestational length](#) and abnormal development of reproductive organs in newborns⁷.

In terms of procedure, independent scientists, academics and civil society organisations have revealed fundamental shortcomings in the EU assessment of glyphosate that deviate

¹ IARC monograph 2015 <https://www.iarc.who.int/featured-news/media-centre-iarc-news-glyphosate/>

² INSERM 2022

<https://presse.inserm.fr/en/publication-de-lexpertise-collective-inserm-pesticides-et-effets-sur-la-sante-nouvelles-donnees/43303/>

³ ECHA 2022 Opinion, harmonised classification and labelling at EU level of glyphosate:
<https://echa.europa.eu/documents/10162/882a2dc7-9e6f-b0ac-491a-ed3526b4018a>

⁴ EFSA 2015 Conclusions Risk assessment of glyphosate <https://doi.org/10.2903/j.efsa.2015.4302>

⁵ Zhang et al. 2021 <https://doi.org/10.1016/j.envpol.2021.117082>; Gunatilake et al., 2019 <https://doi.org/10.3390/ijerph16152734>

⁶ Mesnage et al. 2021 <https://doi.org/10.1289/EHP6990>

⁷ Lesseur et al. 2021 <https://doi.org/10.1016/j.envpol.2021.117002>

from the endorsed principles of “excellence, transparency and independence” resulting in a whitewash of all the evidence that indicates the potential toxicity of glyphosate^{8,9}.

In the Annex to this letter, you may find a few examples of recent scientific findings justifying the need for an immediate ban.

Consequently, glyphosate has remained in the market in pure violation of the provisions of Regulation (EC) 1107/2009 according to which pesticide active substances, pesticide products and their residues placed on the market should not have any harmful effect on humans, animals and no unacceptable effects to the environment.

For civil society, issuing a 1-year extension and prolonging the exposure of farm workers, residents of agricultural zones, EU citizens and the environment to this harm-causing pesticide is beyond comprehension.

Therefore, we urge the European Commission and you as Commissioner to urgently ban glyphosate from the EU market, which is long overdue, based on the current scientific state of play and the precautionary principle, which is at the heart of the Treaty on the Functioning of the European Union and EC Regulation (EC) 1107/2009, aiming to ensure a higher level of human health and environmental protection

The European Commission should take the side of [European citizens](#) and immediately propose an EU ban on glyphosate.

Yours sincerely,

In alphabetical order:

- Bond Beter Leefmilieu, Belgium
- Bündnis für eine enkeltaugliche Landwirtschaft e.V., Germany
- Coordination gegen BAYER-Gefahren, Germany
- Corporate Europe Observatory
- Earth Thrive, Serbia
- ECO CITY, Greece
- Ecologistas en Acción, Spain
- FODESAM, Spain
- Friends of the Earth Europe
- Générations Futures, France
- Health and Environment Alliance
- Hogar sin Tóxicos, Spain
- International Society of Doctors for Environment (ISDE)
- Justice Pesticides, France
- Living Earth Coalition, Poland
- National Society of Conservationists – Friends of the Earth Hungary

⁸ Risk Assessment Committee, presentations by independent scientists
<https://www.env-health.org/health-and-environmental-groups-raise-alarms-over-eu-chemicals-agencys-failure-to-classify-glyphosate-as-a-carcinogen-for-human-health/>

⁹ Health and Environment Alliance, 2021
<https://www.env-health.org/scientific-evidence-of-glyphosate-link-to-cancer-dismissed-in-ongoing-eu-assessment-new-report-reveals/#1528198360361-d0c48b01-9fca743e-c979>

- Nature & Progrès Belgium
- Parkinson Vereniging, Netherlands
- Pesticide Action Network Europe
- Pestizid Aktions-Netzwerk e.V. (PAN Germany)
- Plataforma Transgenicos Fora, Portugal
- SumOfUs
- The Civil Affairs Institute, Poland
- Umweltinstitut München e.V., Germany
- Quercus, Portugal
- Velt, Belgium
- Voedsel Anders, Belgium
- WeMove Europe

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Annex

Examples of recent scientific findings justifying the need for an immediate ban:

- Glyphosate has been classified by the International Agency for the Research on Cancer (IARC) as “**probably carcinogenic to humans**” (Group 2A) in March 2015. Further studies since, support the cancer risk (Zhang et al 2019¹⁰, Portier 2020¹¹, Weisenburger 2021¹²). A [recent analysis](#) revealed the occurrence of clear and statistically significant tumors in 10 out of 11 animal studies.
- A 2022 [review of the industry studies](#) on the **DNA-damaging potential** of glyphosate by scientists at the Vienna Cancer Research Institute, came to the conclusion that only 2 of 35 reviewed industry studies can be considered "reliable", 15 others only as "partly reliable" and 18 of these studies had to be classified as “not reliable”, due to substantial deviations from applicable test guidelines. This is of concern as these studies were submitted by the companies to prove that glyphosate is not genotoxic. Moreover, according to the scientists, despite the high number of studies submitted, two key studies that could reveal the genotoxic potential of glyphosate [were completely missing from the industry’s application](#).
- A recent [review](#) underlines the **neurotoxic** properties of glyphosate and [scientists pointed](#) out that one dismissed industry study showed neurotoxicity concerns many years before. Furthermore number of case studies showing a link between Glyphosate exposure and **Parkinson’s disease**¹³.
- Several other studies proved that glyphosate and glyphosate-based herbicides damage **aquatic species** (fish¹⁴, crustacea¹⁵, amphibians¹⁶, mollusca¹⁷) in environmentally relevant concentrations.
- Several studies investigate the devastating effect glyphosate has on the **microbiome of different species**¹⁸, such as the human¹⁹ microbiome and that of cows²⁰, fish²¹, earthworms²² or bees²³, potentially leading to different health disorders.
- Glyphosate and its main metabolite AMPA have been detected not only in food but also in humans²⁴ and in the environment, including in the air²⁵, soil²⁶ and surface waters²⁷. The environmental concentrations are at levels that are not considered safe for different species²⁸.

¹⁰ Zhang et al. 2019 <https://doi.org/10.1016/j.mrrev.2019.02.001>

¹¹ Portier 2020 <https://doi.org/10.1186/s12940-020-00574-1>

¹² Weisenburger 2021 <https://doi.org/10.1016/j.cml.2021.04.009>

¹³ Barbosa et al. 2001 <https://doi.org/10.1002/mds.1105>; Eriguchi et al. 2019 <https://doi.org/10.2169/internalmedicine.2028-18>;

Wang et al. 2011 <https://doi.org/10.1016/j.parkreldis.2011.02.003>; Wang et al. 2011

<https://doi.org/10.1016/j.parkreldis.2011.02.003>; Zheng et al. 2018 <https://doi.org/10.1016/j.parkreldis.2018.01.021>

¹⁴ Webster & Santos 2015 <https://doi.org/10.1186/s12864-015-1335-5>; Fiorino et al. 2018

<https://doi.org/10.1007/s11356-017-1141-5>; Ames et al. 2022 <https://doi.org/10.1007/s10646-022-02581-z>; Nazari et al. 2014

<https://doi.org/10.1080/15287394.2014.880393>; Terrazas-Salgado et al. 2022 <https://doi.org/10.1080/03601234.2022.2115780>

¹⁵ Cuhra et al. 2012 <https://doi.org/10.1007/s10646-012-1021-1>; Canosa et al. 2018 <https://doi.org/10.1007/s11356-017-0581-2>

¹⁶ Bach et al. 2018 <https://doi.org/10.1016/j.chemosphere.2018.03.110>; Bach et al. 2016

<https://doi.org/10.1007/s11356-016-7631-z>; Meza-Joya et al. 2013 <https://doi.org/10.1002/em.21775>; Navarro-Martín et al. 2014 <https://doi.org/10.1016/j.aquatox.2014.05.017>

¹⁷ Wathsala et al. 2022 <https://doi.org/10.1016/j.etap.2022.103997>

¹⁸ Ruuskanen et al. 2022 <https://doi.org/10.1016/j.tree.2022.09.009>

¹⁹ Puigbò et al. 2022 <https://doi.org/10.3390/life12050707>; Mesnage et al. 2021 <https://doi.org/10.1289/EHP6990>

²⁰ Ackerman et al. 2015 <https://doi.org/10.1007/s00284-014-0732-3>

²¹ Ding et al. 2021 <https://doi.org/10.1016/j.envpol.2021.117685>

²² Morowati 2000 <https://doi.org/10.1023/A:1006704009184>

²³ Batisti et al. 2021 <https://doi.org/10.1016/j.scitotenv.2021.145397>

²⁴ Conrad et al. 2017 <https://doi.org/10.1016/j.ijheh.2016.09.016>

²⁵ Kruse-Platz et al. 2022 <https://doi.org/10.21203/rs.3.rs-495444/v1>

²⁶ Silva et al. 2018 <https://doi.org/10.1016/j.scitotenv.2017.10.093>

²⁷ Marques-Brovini et al. 2021 <https://doi.org/10.1007/s11356-021-14609-8>

²⁸ Herbert et al. 2014 <https://doi.org/10.1242/jeb.109520>; Farina et al. 2019 <https://doi.org/10.3390/insects10100354>,

Weidenmüller et al. 2022 <https://doi.org/10.1126/science.abf7482>; Owagboriaye et al. 2021

<https://doi.org/10.1016/j.toxrep.2021.03.021>

