

To all UK MEPs
European Parliament
Rue Wiertz
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1047 Brussels

April 12, 2016

Dear MEP

Re: Plenary vote on EU Commission's draft measure to renew EU market approval for glyphosate (Wednesday 13th April 2016)

I write on behalf of Breast Cancer UK, to ask you to support the Environment Committee's objection to renew the EU market approval for glyphosate, at the plenary vote on Wednesday 13th April (tomorrow) because of concerns that it may be damaging to human health.

Glyphosate-based herbicides are widely used in agriculture, forests and public spaces including parks, schools and road sides as well as in private gardens. The use of this substance is so extensive that it is now detected in food, drinks and in the human body including babies and young children.

You will be aware that in November 2015, the European Food Safety Agency (EFSA) concluded that glyphosate is "unlikely to pose a carcinogenic hazard to humans"¹ which is counter to the WHO's International Agency for Research on Cancer's (IARC) conclusion earlier in the year that glyphosate *is* a "probable human carcinogen" (2A group)². The contents and conclusions of the EFSA report have been questioned by over 90 leading scientists from around the world³.

Breast Cancer UK is especially concerned about glyphosate's possible role in increasing breast cancer risk. Glyphosate acts as an oestrogen mimic⁴ and has the ability to inhibit aromatase (an enzyme involved in oestrogen biosynthesis), and therefore has the potential to adversely affect breast development.

Glyphosate's cancer causing and hormone disrupting properties would disqualify it from EU market approval under EU pesticides law.

In addition to human health concerns, there are many environmental problems associated with heavy

¹ EFSA (2015). European Food Safety Authority. Conclusion on the peer review of the pesticide risk assessment of the active substance glyphosate. EFSA Journal 2015: 13:4302. http://www.efsa.europa.eu/sites/default/files/scientific_output/files/main_documents/4302.pdf

² Guyton, K. Z. et al. (2015). Carcinogenicity of tetrachlorvinphos, parathion, malathion, diazinon, and glyphosate. Lancet Oncology 16(5): 490-1. [http://www.thelancet.com/journals/lanonc/article/PIIS1470-2045\(15\)70134-8/abstract](http://www.thelancet.com/journals/lanonc/article/PIIS1470-2045(15)70134-8/abstract)

³ Portier, C. J. et al. (2015). Open letter: Review of the Carcinogenicity of Glyphosate by EFSA and BfR. November 27 2015 <http://www.zeit.de/wissen/umwelt/2015-11/glyphosat-offener-brief.pdf>

⁴ Thongprakaisang S, et al. (2013) [Glyphosate induces human breast cancer cells growth via estrogen receptors](#). Food and Chemical Toxicology 59C: 129-136.

Defarge, N. (2016). [Co-Formulants in Glyphosate-Based Herbicides Disrupt Aromatase Activity in Human Cells below Toxic Levels](#). International Journal of Environmental Research and Public Health 13(3) 264

and repeated uses of glyphosate-based herbicides according to scientists.

Despite these serious concerns, the European Commission's initial proposal

- is for the maximum period possible (15 years),
- bans only one of the nearly 500 possible co-formulants, polyethoxylated (POE)-tallowamine, already no longer used in Germany -one of Europe's largest pesticides markets,
- allows a 66% increase in residues on food.
- allows glyphosate producers to prove the absence of hormone disruption *after* obtaining approval, a practice deemed inappropriate by the [EU Ombudsman, for this sort of case](#).

The European Chemicals Agency (ECHA), which is formally responsible for the EU carcinogen classification, is about to review the possible [carcinogenicity, germ cell mutagenicity and reproductive toxicity](#) of glyphosate. That process will not be finalised before the end of 2017.

It is our strong view that the EU should not take any final decision before the potential health and environmental impacts of glyphosate have been fully established. In addition, the EU should ban immediately all uses of glyphosate that result in the greatest public and worker exposure, either directly or through residues in food.

Therefore we call on you to vote in favour of the Environment Committee's objection to the Commission's proposal for glyphosate renewal on Wednesday (13th April) and to stand for the protection of human health, environment, and safer farming for all agricultural communities.

For further information on [glyphosate](#) and its possible role in breast cancer please visit our [website](#) to read our background briefing.

Yours sincerely



Lynn Ladbrook
Chief Executive
Breast Cancer UK

Further Information

In March 2015, the WHO's **International Agency for Research on Cancer (IARC)** classified glyphosate as a '[probable carcinogen](#)' based on 'limited evidence' in humans and 'sufficient evidence' in animals that glyphosate can cause cancer in humans. IARC has also found 'strong evidence' that glyphosate exhibits two characteristics associated with carcinogens, namely genotoxicity and the ability to induce oxidative stress.

In November 2015, the **European Food Safety Agency (EFSA)** arrived at the [opposite conclusion](#). It stated that evidence in humans is 'very limited' and that there is 'no evidence' of carcinogenicity in animals. EFSA also dismissed the evidence of genotoxicity and oxidative stress. EFSA had access to at least three [additional industry studies](#) that IARC had not seen, and that José Tarazona, head of EFSA's Pesticides Unit, described as "key" and "pivotal".

However, **94 independent scientists** – including 8 out of 17 members of the IARC Working Group – argue in a recent [editorial](#) that: *"Serious flaws in the scientific evaluation in the RAR incorrectly characterise the potential for a carcinogenic hazard from exposure to glyphosate."*

The **EU Ombudsman** has recently [slammed](#) the European Commission's practice of accepting proof of a pesticide's safety after its formal approval. She said the practice should be applied *"restrictively"* and only *"where there is no risk that the conclusion on the safety of the active substance could be flawed"*. Nonetheless, the European Commission has proposed to "submit confirmatory information as regards the absence of endocrine disrupting properties that may cause adverse effect in humans" by 1 August 2016, whereas the current EU approval runs out on 30 June 2016.

Glyphosate residues have been found in [bread](#) and [beer](#), as well as [human urine](#). EFSA has [stated](#) that existing monitoring efforts are insufficient to reliably measure glyphosate residue levels in food.

Widespread use of glyphosate has led to the emergence and spread of **glyphosate-resistant weeds**, causing farmers to spray additional herbicides. It can also "significantly increase the severity of various plant diseases, impair plant defense to pathogens and diseases, and immobilize soil and plant nutrients rendering them unavailable for plant use," according to [Johal and Huber, 2009](#). The scientists warned that "ignoring potential non-target detrimental side effects of any chemical, especially used as heavily as glyphosate, may have **dire consequences for agriculture** such as rendering soils infertile, crops non-productive, and plants less nutritious".