





To: Ursula von der Leyen, President of the European Commission  
Cc: Maroš Šefčovič, Executive Vice-President for European Green Deal, Interinstitutional Relations and Foresight  
European Commission  
Rue de la Loi 200 B-1049 Brussels

Brussels, on November 14th 2023

Subject: Stop the re-approval of glyphosate in light of new scientific evidence on cancer risk

Dear President of the European Commission,

We, the undersigned 106 European civil society organisations, wish to express our support for the European Commission's commitment, under the European Green Deal, to transition the EU towards sustainable food systems, reduce reliance on chemical pesticides, and protect human health, the environment, and biodiversity from pesticide pollution. In this regard, we are writing to you to request your intervention in ensuring that the Commission withdraws its proposal to renew glyphosate's approval for 10 years, in light of new compelling evidence showing that the substance causes leukaemia in young rats. Considering the increasing evidence from independent scientific studies that link exposure to this popular pesticide with a range of harmful effects on humans and the environment, we call upon you to take action and propose the non-renewal of its approval.

The [first carcinogenicity data](#) from the Global Glyphosate Study (GGS) were recently made public and show that even low doses of glyphosate-based herbicides<sup>1</sup> (GBHs) - which were previously assumed to cause no adverse effects during the EU assessment - resulted in early deaths from leukaemia in rats, following early-life exposure<sup>2</sup>. One of the GBHs tested in the GGS was the representative formulation BioFlow (MON 52276), for which the European Food Safety Authority (EFSA) had recently wrongfully 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. As the European Commission is aware, this representative formulation is widely sold in Europe<sup>3</sup>. These findings are extremely concerning given that glyphosate is the most widely used herbicide in Europe, with [widespread exposure](#) among humans, including children, and is [ubiquitous in the environment](#).

The GGS results add to the [already existing evidence of the substance's carcinogenic potential](#) and unequivocally affirm the concerns voiced by NGOs, trade unions, and independent scientists, offering concrete evidence of the important shortcomings in the EU's scientific evaluation process. It is clear that

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<sup>1</sup> At the No Observed Adverse Effect Level (NOAEL)

<sup>2</sup> The Global Glyphosate Study (GGS) is a multi-institutional international toxicological study. The GSS first carcinogenicity data, released on the 25th of October show that half of the leukaemia deaths seen in rats occurred between 21 weeks (comparable to about 16 years in humans) and 1 one year of age (comparable to roughly 40 years in humans).

<sup>3</sup>Renewal Assessment Report (RAR), 2021 "The representative formulation is widely registered in the EU. The products with following trade names, have been registered in the three zones (corresponding to South, Central, North EU): Roundup Bioflow – Italy, Roundup Evolution – Netherlands, Roundup Ultra – Sweden".

glyphosate's carcinogenicity and genotoxicity potential has not been properly assessed and crucial evidence from independent literature has not been taken into account in the EU assessment [1]. Furthermore, existing scientific literature points to the genotoxic potential of the representative formulation "Bioflow", and EFSA also reported data gaps in the assessment and indicated potential genotoxicity of certain ingredients. However, instead of raising concerns, EFSA disregarded this evidence and concluded that its use is safe even in the absence of a long-term toxicity or carcinogenicity study on this representative formulation submitted by the applicants. This is beyond comprehension as, according to Regulation (EU) 1107/2009 (Article 4) 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 and GBHs 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], as well as amyotrophic lateral sclerosis [4] and Parkinson's disease in adults [5]. It has also been linked to endocrine disruption [6] and alterations in the microbiome [7]. From an environmental perspective, exposure to glyphosate has been shown to cause toxicity to a wide range of terrestrial [8] and aquatic non-target species [9], potentially causing serious [impacts on biodiversity](#). Alarmingly, all these important harmful effects were also not considered as 'critical areas of concern' by EFSA in its conclusion, for which [the scientific community](#) has already voiced its objections.

Evidently glyphosate fails to meet the approval criteria laid down in Regulation (EU) 1107/2009 according to which pesticide active substances and pesticide products used in the EU should cause no harm to humans, animals and the environment. Taking into account the widespread use and exposure to glyphosate-based products, neglecting the reported adverse effects poses a grave health risk to both farm workers and the general population, and also threatens biodiversity. As the President of the European Commission, it is your responsibility to uphold the principles of the European Green Deal and evoke the precautionary principle, given glyphosate's alarming health and environmental implications. We urge you to intervene and ensure that the European Commission withdraws its proposal for a 10-year renewal of the glyphosate licence and instead proposes its non-renewal, prioritising in this way human health and the environment over maintaining this harmful substance on the market.

Thank you in advance for your consideration.

Yours sincerely,

Martin Dermine  
Executive Director  
Pesticide Action Network Europe

On behalf of a 106 organisations from all over Europe :

Agrolink

Alerte des Médecins sur les Pesticides (AMLP)

Alliance for Cancer Prevention UK

Association Forum of Organic Agriculture named M. Górný

Aurelia Foundation, Germany

Avaaz

Baby Milk Action

Biodynamic Federation Demeter International

Bond Beter Leefmilieu, Belgium

Bors Alapítvány, Hungary

BOS+, Belgium

Broederlijk Delen, Belgium

Bündnis für eine enkeltaugliche Landwirtschaft e.V., Germany

Canopea, Belgium

Cantine sans plastique France

Caring Doctors, Netherlands

Caring Farmers, Netherlands

CCFD-Terre Solidaire, France

Child Rights International Network (CRIN)

Coalition Living Earth, Poland

Corporate Europe Observatory (CEO)

Decade of Action

Dryade, Belgium

E-misszió Environmental Association, Hungary

Earth Thrive

Eco Hvar

ECOCITY

Ecologistas en Acción, Spain

Ekō

Energia és Környezet Alapítvány, Hungary

European Alliance of Initiatives for Applied Anthroposophy

European Environmental Bureau

European Federation of Food, Agriculture and Tourism Trade Unions (EFFAT)

European Network of Scientists for Social and Environmental Responsibility (ENSSER)

FAUNA ALAPÍTVÁNY

Felelős Gasztróhős Alapítvány / Heroes of Responsible Dining Foundation

Fenntarthatóság Felé Egyesület, Hungary

Fészek egyesület, Hungary

FIAN European sections/ FIAN Belgium

foodwatch international

Friends of the Earth Europe  
Générations Futures, France  
GESUNDHEIT AKTIV e.V., Germany  
Gibanje Zdrava družba  
GLOBAL 2000  
Health and Environment Alliance (HEAL)  
Health and Environment Justice Support (HEJSupport)  
Hogar sin Tóxicos, Spain  
INFACT USA  
Instytut Spraw Obywatelskich (Civil Affairs Institute), Poland  
International Baby Food Action Network  
International Society of Doctors for Environment (ISDE), Italy  
Join For Water, Belgium  
Kétker Közösségi Alapítvány  
Kom op tegen Kanker, Belgium  
KonVIB  
La Mutuelle Familiale, France  
Landwijzer vzw, Belgium  
Limburgse Milieukoepel vzw  
Linked.Farm, Belgium  
Magosfa Alapítvány (Magosfa Foundation), Hungary  
Magyar Környezeti Nevelési Egyesület (Hungarian Society for Environmental Education)  
Magyar Természetvédők Szövetsége (Friends of the Earth Hungary)  
Mouvement Ecologique, Luxembourg  
Mutualités Libres/ Onafhankelijke Ziekenfondsen  
Natagora, Belgium  
Nature & Progrès Belgique  
Natuur & Milieu, The Netherlands  
Natuur en Milieufederatie Zuid-Holland, The Netherlands  
Natuurbehoud langs Durme, Moervaart en Schelde  
Natuurmonumenten, The Netherlands  
Parkinson Vereniging  
Pesticide Action Network (PAN) Europe  
Pesticide Action Network (PAN) International  
Pesticide Action Network Netherlands (PAN-NL)  
Pestizid Aktions-Netzwerk e.V. (PAN Germany)  
Polish Ecological Club, Poland  
Pomona vzw, Belgium  
Réseau Civam  
Réseau Environnement Santé  
Reset.Vlaanderen  
Rezero

Safe Food Advocacy Europe  
Schweisfurth Stiftung  
Secrets Toxiques  
Slow Food Deutschland  
Solidagro  
Stichting Urgenda, Netherlands  
Udruženje "Nimbus" Loznica, Serbia  
Umweltinstitut München e.V., Germany  
Union Nationale de l'Apiculture Française (UNAF)  
Veblen Institute for economic reforms, France  
Védegylet Egyesület (Protect the Future Association, Hungary)  
Velt vzw, Belgium - The Netherlands  
Vitale Rassen België  
Vlaamse Parkinson Liga, Belgium  
Voedsel Anders, Belgium  
Vogelbescherming Vlaanderen vzw  
Wemove  
Werkgroep Natuurlijk Imkeren - WNI.  
Wervel, Belgium  
Women Engage for a Common Future (WECF) International  
Zemljane staze, Croatia  
ZERO - associaçao sistema terrestre sustentável  
Zöld Akció Egyesület (Green Action Association), Hungary  
Zveza biodinamikov Slovenije, Slovenia

## ENDNOTES

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