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Expert opinion on adherence to the rules of good scientific practice in the subsections "B.6.4.8 Published data (released since 2000)", "B.6.5.3 Published data on carcinogenicity (released since 2000)" and "B.6.6.12 Published data (released since 2000)" in the report "Final addendum to the Renewal Assessment Report. Risk assessment […] for the active substance GLYPHOSATE […]", October 2015, 4322 pages

1. The task

The expert's task was to compare the three subsections B.6.4.8, B.6.5.3 and B.6.6.12 of the report "Final addendum to the Renewal Assessment Report. Risk assessment […] for the active substance GLYPHOSATE […]", October 2015, 4322 pages (hereafter: ***report***) with document M in annex II, section 3, point 5: "Toxicological and toxicokinetic studies" of the license application "Glyphosate & the IPA-, K-, NH_4- und DMA salts of glyphosate […] Application for Renewal of Approval […]" by the 'Glyphosate Task Force' (author reference: "Monsanto Europe S.A. on behalf of the 'Glyphosate Task Force'"), May 2012, Belgium, 1027 pages (hereafter: ***application***) for text concordances.

There were three questions to answer:

1) Are the rules of good scientific practice applicable to these types of texts – the application and the assessment report?
2) If so, have the rules of good scientific practice been properly applied or not?
3) If not, does this constitute scientific misconduct in the form of plagiarism?

The three subsections of the ***report*** to be examined are the assessments of publicly available studies published in scientific journals on the subject of significant health hazards potentially caused by glyphosate, and including **genotoxicity (Chapter B.6.4.8)**, **carcinogenicity (Chapter B.6.5.3)** or **reproductive toxicity (Chapter B.6.6.12)**. For this purpose the reliability and relevance of the most important studies used in assessing the risk of glyphosate were examined. As the rapporteur, it was the duty of Germany to conduct this review of the published studies.[1] These assessments were then reflected in other summary chapters of the ***report***.

[1] Chapter B of the ***report*** refers to the "Rapporteur Member State", in this case Germany.

2. The method

The comparison was conducted both automatically and manually. The texts were matched as text-only files using the software *WCopyfind 4.1.5.* The text concordances highlighted by the software were then reviewed manually in searchable PDF versions of the source text.

3. The result

The rules of good scientific practice are applicable in this case. Scientific misconduct was found. It was possible to identify significant fragments of text which should be classified as plagiarised text.

3.1 Authorship and case examples of plagiarised text

We assume that the BfR, the German Federal Institute for Risk Assessment (Bundesinstitut für Risikobewertung) was the author of the incriminating passages.[2] The BfR is committed to the principles of good scientific practice as recommended by the German Research Foundation (Deutsche Forschungsgemeinschaft - DFG) for universities and research institutes in Germany.[3]

Chapter II.2 of the "Principles of 'Good Scientific Practice' of the BfR" identifies plagiarism as an example of scientific misconduct. Plagiarism is defined as "unauthorised use under the pretence of authorship."[4] Only the 28 October 2014 version of these principles could be found on the internet. However, as this is the standard formulation which the German Research Foundation had established and first recommended for use as early as December 1997, it can be assumed that the principle of adhering to the rules of good scientific practice was also valid at the BfR in the years 2012 (possibly when processing of this assessment started) to 2014.

The following section offers examples of plagiarised text in the three chapters examined.

[2] The press release dated 20 September 2017 refuting the accusation of plagiarism, however, does *not* contest the BfR's responsibility for the incriminating text passages: http://www.bfr.bund.de/de/presseinformation/2017/34/glyphosatbewertung__bfr_weist_plagiatsvorwuerfe_zurueck-201885.html.

[3] http://www.bfr.bund.de/de/grundsaetze_zur_guten_wissenschaftlichen_praxis-192413.html. The German Research Foundation's sources can be found here: http://www.dfg.de/foerderung/grundlagen_rahmenbedingungen/gwp

[4] This is the standard formulation used by almost all universities and research institutes to define "plagiarism". http://www.bfr.bund.de/cm/343/grundsaetze_zur_guten_wissenschaftlichen_praxis_im_bfr.pdf, p.2.

3.1.1 Genotoxicity (Chapter B.6.4.8)

The largely verbatim matches in chapter B.6.4.8 of the ***report*** and chapter 4 – *Literature Review of Genotoxicity Publications* in the ***application*** are plagiarised text[5], if only because the original author, namely former Monsanto employee and current Monsanto consultant Larry D. Kier, PhD[6], who is cited in the ***application*** is not mentioned in the ***report:***

4. Literature Review of Genotoxicity Publications

The following genotoxicity literature review was conducted by an expert in the field of genotoxicology. Relevant OECD Tier II-like summaries and Klimisch ratings (Klimisch, 1997), as described in introduction of the overall literature review, follow this genotoxicity literature review.

Review of Genotoxicity of Glyphosate and Glyphosate Based Formulations,
Larry D. Kier, PhD, Genotoxicology Consultant, Buena Vista, CO

Source: ***Application***, p. 886.

The author Larry D. Kier was not mentioned at this point in the ***report***. Large parts of his review were reproduced, with some pages copied word-for-word; several more recent studies which were published after the ***application*** were added in the form of synopses. Several paragraphs on more recent literature were also supplemented.

For the review of the studies up to 2000, which is a part of the total review, Kier for his part referred to an overview paper by Williams et al. 2000. As a result, the author of the ***report*** not only omitted to consult the originals of the empirical studies presented in synopsis and assessed, but also offers assessments of the studies which Kier assessed *after Williams et al.* (or *again*?), but without stating that these are Kier's judgments. This is demonstrated in the following two examples:

[5] Even without stating the name of the author in the original, reproducing these passages meets the definition of text plagiarism.
[6] http://www.monsantoglobal.com/iarc-roundup/Documents/Kier-Larry%20CV.pdf

Example 1: Kier quotes Williams et al., but the BfR does not quote Kier:

4. Gene Mutation

As reviewed by Williams et al., (2000), most gene mutation studies for glyphosate and GBFs were negative. Gene mutation assays included numerous Ames/*Salmonella* and *E. coli* WP2 bacterial reversion assays, *Drosophila* sex-linked recessive lethal assays and a CHO/HGPRT *in vitro* mammalian cell assay. Of fifteen gene mutation assays reported, there were only two positive observations. A reported positive Ames/*Salmonella* result for Roundup formulation was not replicated in numerous other studies. There was one report of a positive result for a GBF in the *Drosophila* sex-linked recessive lethal assay but this was contradicted by a negative result for the same GBF in this assay reported by another laboratory. Further, the positive study had some features that hampered interpretation, including the lack of concurrent negative controls (Williams et al., 2000).

Source: ***Application***, p. 893. Author: Larry D. Kier.

This passage was copied and pasted into the ***report***:

B.6.4.8.4 Gene Mutation

As reviewed by Williams et al., (2000, ASB2012-12053), most gene mutation studies for glyphosate and GBFs were negative. Gene mutation assays included numerous Ames/*Salmonella* and *E. coli* WP2 bacterial reversion assays, *Drosophila* sex-linked recessive lethal assays and a CHO/HGPRT *in vitro* mammalian cell assay. Of fifteen gene mutation assays reported, there were only two positive observations. A reported positive Ames/*Salmonella* result for Roundup formulation was not replicated in numerous other studies. There was one report of a positive result for a GBF in the *Drosophila* sex-linked recessive lethal assay but this was contradicted by a negative result for the same GBF in this assay reported by another laboratory. Further, the positive study had some features that hampered interpretation, including the lack of concurrent negative controls (Williams et al., 2000).

Source: ***Report***, p. 406. Author presumably BfR.

When author B (in this case Kier) references author A (in this case Williams et al.), and author C (here the BfR) adopts this reference as if it had itself reviewed the work of author A, then this is a case of **(secondary) literature plagiarism**.

*Example 2: Kier references and assesses studies after 2000 (i.e. published **after** the overview paper by Williams et al.), but the BfR fails to cite Kier:*

increased with concentration and time. This publication did not report toxicity measurements or, more specifically, measurements of cell viability in the population studied. Positive results were also reported in erythrocytes of the European eel, *Anguilla anguilla*, exposed to 58 and 116 µg/liter of a Roundup GBF in water for 1 or 3 days (Guilherme et al., 2010). Increases in nuclear abnormalities were also observed in erythrocytes from animals exposed for 3 days. Measurement of toxicity was not reported for the animals or erythrocytes; however, several endpoints relevant to antioxidant responses and oxidant effects were made in whole blood samples. No statistically significant effects were observed for catalase, glutathione transferase, glutathione peroxidase, glutathione reductase or reduced glutathione content. A large statistically significant increase for thiobarbituric acid reactive substances (TBARS, a measure of lipid peroxidation) was observed for the 115 µg/liter concentration group at 1 day. Statistically significant TBARS increases were not observed at 3 days, but, the 3-day negative control value appeared to be several fold higher than the 1-day value. Negative alkaline SCGE results were reported in cells of

Source: ***Application***, p. 901. Author: Larry D. Kier.

time. This publication did not report toxicity measurements or, more specifically, measurements of cell viability in the population studied. Positive results were also reported in erythrocytes of the European eel, *Anguilla anguilla*, exposed to 58 and 116 µg/liter of a Roundup GBF in water for 1 or 3 days [redacted]., 2010, ASB2012-11836). Increases in nuclear abnormalities were also observed in erythrocytes from animals exposed for 3 days. Measurement of toxicity was not reported for the animals or erythrocytes; however, several endpoints relevant to antioxidant responses and oxidant effects were made in whole blood samples. No statistically significant effects were observed for catalase, glutathione transferase, glutathione peroxidase, glutathione reductase or reduced glutathione content. A large statistically significant increase for thiobarbituric acid reactive substances (TBARS, a measure of lipid peroxidation) was observed for the 115 µg/litre concentration group at 1 day. Statistically significant TBARS increases were not observed at 3 days, but, the 3-day negative control value appeared to be several fold higher than the 1-day value.

Source: ***Report***, p. 416. Author presumably BfR.

This is a case of a **genuine text plagiarism.** The statements are simply adopted verbatim, without identifying them as such and with no source citation, as if this were the assessment of the BfR. As a result, it is not clear whether the BfR had conducted its own assessments which had delivered exactly the same result as Kier's assessment.

3.1.2 Carcinogenicity (Chapter B.6.5.3)

Summaries and assessments in this subsection were also taken verbatim from the ***application.*** This has happened to a lesser extent than in subsection B.6.4.8, although here too, many longer passages of text have been taken, sometimes several paragraphs at a stretch (value judgments underlined):

The authors reported statistically significant associations for NHL with: reported use of any herbicide (OR = 1.6), reported use of any fungicide (OR = 3.7), and reported use of 4-chloro-2-methylphenoxyacetic acid (OR = 2.7). The major limitations of this study were: the reliance on reported pesticide use (not documented exposure) information, the small number of subjects who reported use of specific pesticides, the possibility of recall bias, the reliance on secondary sources (next-of-kin interviews) for approximately 43% of the pesticide use information, and the difficulty in controlling for potential confounding factors, given the small number of exposed subjects.

The authors also reported a moderately elevated OR of 2.3 for glyphosate. This OR was not statistically significant and was based on only four "exposed" cases and three "exposed" controls. This finding needs

Critique

This study has several important limitations: no exposure assessment, dependence on next-of-kin's recollections of study subjects' pesticide use for approximately 43% of study subjects, potential recall bias, and the very small number of subjects who reported using specific herbicides. The latter leads to findings that are statistically imprecise. Due to the potential for bias and the statistical imprecision, the results of this study are not convincing.

Source: ***Application***, p. 854 and 857.

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Source: ***Report***, p. 535. Author presumably BfR.

3.1.3 Reproductive toxicity (B.6.6.12)

As in the other two subsections, the same practice of copy and paste is evident here:

Epidemiology Glyphosate DART/ED Publications

Several epidemiology studies in which glyphosate exposure was considered have evaluated the following range of reproductive outcomes; miscarriage, fecundity, pre-term delivery, gestational diabetes mellitus, birth weights, congenital malformations, neural tube defects, attention-deficit disorder / attention-deficit hyperactive disorder (ADD/ADHD). In most instances, glyphosate and reproductive outcomes lack a statistically significant positive association, as described in a recent review of glyphosate non-cancer endpoint publications by experts in the field of epidemiology, Pam Mink, Jack Mandel, Jessica Lundin and Bonnielin Sceurman (Mink et al., 2011). In evaluating ADD/ADHD a positive association with glyphosate use was reported by Garry et al (2002), but cases were parent reported with no clinical confirmation and the reported incidence rate of approximately 1% for the study population was well below the general population incidence rate of approximately 7%. Regarding *in utero* exposures, McQueen et al. (2012) report very low measured dietary exposures, from 0.005% to 2% of the current glyphosate ADI in Europe. Given the low perfusion rate of glyphosate across the placenta (Mose et al., 2008), human *in utero* exposures would be very limited.

Source: ***Application***, p. 736.

Epidemiology Glyphosate DART/ED Publications

Several epidemiology studies in which glyphosate exposure was considered have evaluated the following range of reproductive outcomes; miscarriage, fecundity, pre-term delivery, gestational diabetes mellitus, birth weights, congenital malformations, neural tube defects, attention-deficit disorder / attention-deficit hyperactive disorder (ADD/ADHD). In most instances, glyphosate and reproductive outcomes lack a statistically significant positive association, as described in a recent review of glyphosate non-cancer endpoint publications (Mink et al., 2011, ASB2012-11904). In evaluating ADD/ADHD, a positive association with glyphosate use was reported by Garry et al. (2002, ASB2012-11626), but cases were reported by parents with no clinical confirmation and the reported incidence rate of approximately 1 % for the study population was well below the general population incidence rate of approximately 7 %. Regarding *in utero* exposures, McQueen et al. (2012, ASB2012-11898) report very low measured dietary exposures, from 0.005 % to 2 % of the current glyphosate ADI in Europe. Given the low perfusion rate of glyphosate across the placenta (Mose et al., 2008, ASB2012-11914), human *in utero* exposures would be very limited.

Source: ***Report***, p. 674. Author presumably BfR.

3.2 On the "value judgment chains" which result from the plagiarism, as demonstrated in subsection B.6.4.8

The following chain of adopted evaluations can be reconstructed in subsection B.6.4.8:

- Kier adopts (parts) from Williams et al.;
- Kier himself assesses the studies published after 2000;
- The Task Force takes over Kier's evaluations word-for-word;
- The BfR adopts Kier in the Task Force almost word-for-word, but without citation.

The Task Force notes in the ***application***: "Relevant OECD Tier II-like summaries and Klimisch ratings (Klimisch, 1997), as described in introduction of the overall literature review, follow this genotoxicity literature review." (p. 886). **And it is precisely this evaluation which is copied and pasted verbatim into the report.**

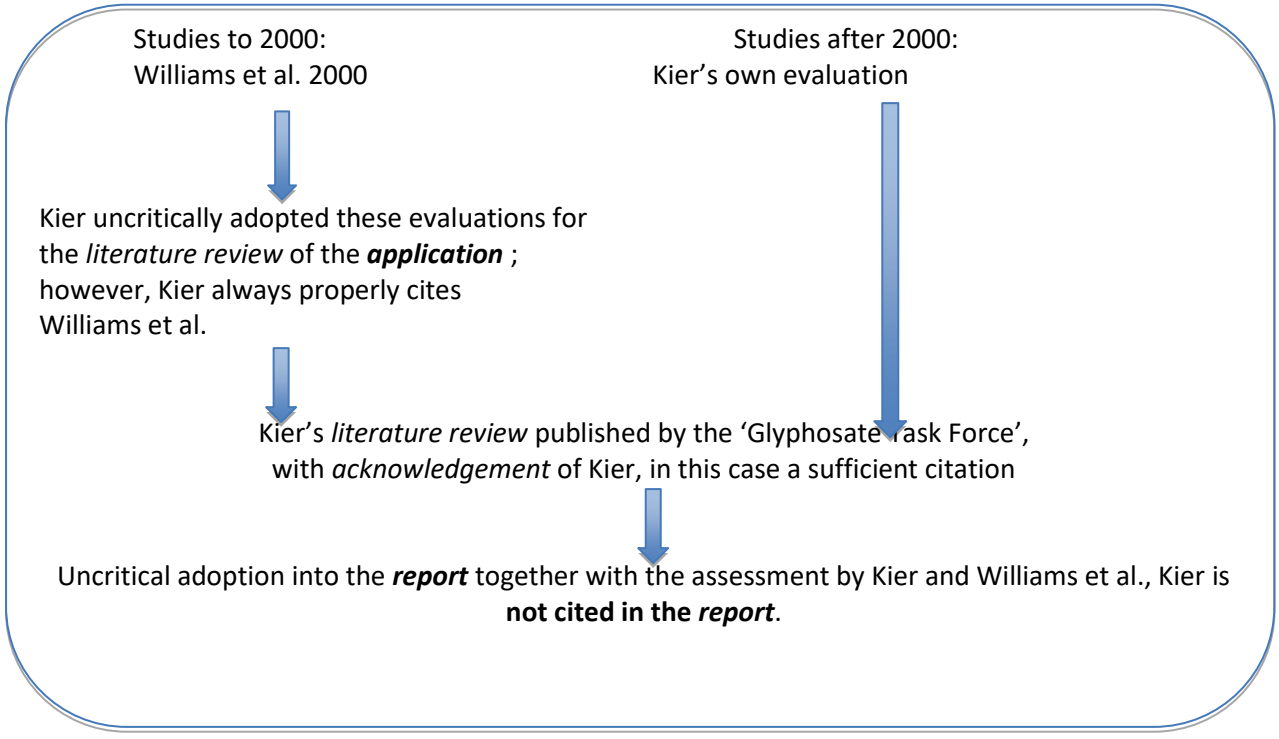

Fig. 1 (System according to S.W.)

The following example shows how value judgments (underlined) are typically adopted as the result of word-for-word text plagiarism:

Overall there appear to be a number of studies in which glyphosate or GBFs have been reported to produce positive responses in DNA damage endpoints of SCE or alkaline SCGE *in vitro* in mammalian cells. Most of these have occurred with exposures to mM concentrations of glyphosate. Although this dose level range is lower than the limit dose of 10 mM recommended for several *in vitro* mammalian cell culture assays (OECD473, 1997; OECD476, 1997; OECD487, 2010), an even lower limit dose of 1 mM was recently recommended for human pharmaceuticals, particularly because of concerns about relevance of positive *in vitro* findings observed at higher dose levels (ICHS2(R1), 2008; Parry et al., 2010). In addition, many of the studies have limitations such as not indicating control of medium pH and not coding slides for visual scoring.

Source: ***Application***, p. 900. Author: Larry D. Kier.

Overall there appear to be a number of studies in which glyphosate or GBFs have been reported to produce positive responses in DNA damage endpoints of SCE or alkaline SCGE *in vitro* in mammalian cells. Most of these have occurred with exposures to mM concentrations of glyphosate. Although this dose level range is lower than the limit dose of 10 mM recommended for several *in vitro* mammalian cell culture assays (OECD473, 1997; OECD476, 1997; OECD487, 2010), an even lower limit dose of 1 mM was recently recommended for human pharmaceuticals, particularly because of concerns about relevance of positive *in vitro* findings observed at higher dose levels. In addition, many of the studies have limitations such as not indicating control of medium pH and not coding slides for visual scoring.

Source: ***Report***, p. 415. Author presumably BfR.

The adopted, uncited evaluations analysed in the three chapters B.6.4.8, B.6.5.3 and B.6.6.12 in turn found their way into the front sections and overviews of the ***report.*** A detail plagiarism analysis will examine this practice.

3.3 Potential objections and those already raised by the BfR and EFSA

The following section will discuss and debunk seven objections. The BfR already raised the first three in its defence, EFSA mentioned the fourth:

1) The citation requirement is lifted when cross-referencing the status of research*:* The justification that an overview of the published data, in the sense of determining the status of research, is not subject to the duty to provide citations as this is a form of general knowledge (at least within the discipline) misses the mark. It is not only the status of research which has been cross-referenced, numerous evaluation/classifications have also been declared, and subsequently also adopted, uncited. Furthermore, the paper incorporated in the application was itself used by Kier as the basis

for a later scientific publication[7] so that the scientific independence of the "original", irrespective of the truth or falsity and/or the reliability of the statements, must be accepted.

In contrast, in a press release dated 20September, 2017, the President of the BfR is quoted as saying: "The dossiers submitted as part of the legal assessment procedure are compilations of pre-existing studies and are therefore not pieces of original scientific work."8 This claim is doubly untrue: 1) the Kier text is an original study, at least a preparatory one, and 2) these are not "compilations" but primarily classifications for evaluation. Moreover, it would be surprising if "compilations of pre-existing studies", in as far as this description is fitting, were not subject to the citation requirement. Such an interpretation would, in any case, contradict all the teachings on scientific working methods.

***2) There was a critical examination of all the details**:* In the press release noted above the BfR claims that, "In Europe and worldwide, it is standard practice and recognised that in assessment procedures, not only for pesticides, after critical examination the assessing authority also integrates relevant passages from submitted documents in its assessment report." However, this integration does not free the authorities of their duty to provide citations, and to distinguish between their own intellectual property and that of third parties. The BfR cannot negate that in the passages provided as examples here (and many others could have been named) all indications of this type are missing: "The following explanations have been taken from the Glyphosate Task Force. The BFR has reconstructed all of the study evaluations and comes to exactly the same results. For this reason, the explanations have been adopted word-for-word and only updates have been made." The plagiarism results from the failure to add this note.

3) *A 're-write' had not been necessary because the data were correct:* The BfR argued: *"Whenever the applicant correctly cites studies and interprets them in the relevant summaries in a correct manner, both in terms of the science and the methodology, in the past the European assessment authorities have had no reason to re-write such statements in the numerous application and licensing procedures for pesticides, chemicals and drugs*." It is astonishing that the BfR even considers the option of a 're-write', as if this would constitute good scientific practice at best. However, this is not about paraphrasing or 'leaving' the original text, but about *failing to cite sources* and about *failing to identify texts written by other authors* – also in the sense of optical highlighting.

In the end it is all about the reader's understanding of the text: in the incriminating passages the reader has no doubt that the BfR is describing its own literature research – including presenting its methodology – and giving its own judgments, while in reality these are the judgments either of the 'Glyphosate Task Force'" or of Dr Kier.

[7] See Kier/Kirkland 2013: https://www.ncbi.nlm.nih.gov/pubmed/23480780
[8] http://www.bfr.bund.de/de/presseinformation/2017/34/glyphosatbewertung__bfr_weist_plagiatsvorwuerfe_zurueck-201885.html

4) ***When agreeing with the content it is permissible, and even standard practice, to adopt the text verbatim:*** The EFSA states in its press release of 9 September 2017: "*If the RMS agrees with a particular summary or evaluation it may incorporate the text directly into the draft assessment report.*"[9] The approach described here seems unusual: The review criteria are neither transparent, nor can the reader discern which passages come from the applicant and which from the authority. Once more it is important to stress that incorporating text passages from the application is consistent with good scientific practice **only when the text passages are marked as such**, i.e. visually highlighted (indentation, different font or font size, or a combination of all three, etc.) or by using quotation marks. Deviating from this norm, however, leads to the (un)culture of copy & paste and a lack of transparency.

5) ***Only an expert in the same discipline (e.g. biochemistry) is able to evaluate the text concordances:*** To the contrary, as past cases have repeatedly shown, experts in plagiarism research are most suited to judging accusations of plagiarism. While citation rules may vary among the disciplines, there is always a ban on plagiarism: *"Scientific work is based on principles which are the same in all countries and in all scientific disciplines. The primary principle is that of honesty with oneself and with others."*[10]

6) ***The authorities' input is not "scientific work", at least not in the strict sense:*** Here is a quote from page 2 of the "Principles of 'Good Scientific Practice' of the BfR": "*Scientific misconduct exists where incorrect information is provided knowingly or as a result of gross negligence, where the intellectual property of others is violated, or where their research activity is compromised in any way."* The BfR could counter that providing input for the EFSA does not constitute "scientific work", at least in the strict sense. But then the question of which papers written by the BfR are scientific papers would arise. Are the scientific methodology and fundamental scientific principles not applicable to this input? Scientific papers are not only academic papers, monographs and papers in reviewed journals but, in the broader sense, all papers to which the application of scientific methodology is both fundamental and essential. A paper referenced in science and scientifically cited is a scientific paper.

7) ***There is no author and as such "claims of (own) authorship" cannot apply***: The author does not always have to be a natural person. Institutions and groups of authors can be authors too.

[9] https://www.efsa.europa.eu/sites/default/files/170922_glyphosate_statement.pdf, RMS: Rapporteur Member State.
[10] Deutsche Forschungsgemeinschaft (Ed.) (1998): Sicherung guter wissenschaftlicher Praxis. Denkschrift, Weinheim: Wiley-VCH, p. 5.

If plagiarism could only occur where the names of the authors are known, there could be no discussions about plagiarism in encyclopaedias and Wikipedia.[11]

3.4 Summary

It is absolutely correct to call this plagiarism in the sense of scientific misconduct because the presumed author, the Federal Institute for Risk Assessment (BfR), is committed to the same principles of good scientific practice as universities, and defines the concept of plagiarism in the same way. The systematic omission of 1) *indications* and 2) *source references* over several pages can only be interpreted as deliberately concealing the origin of the text in the sense of conditional intent. Formal errors must be excluded.

One can only speculate about the cause(s) of the plagiarism which range from simple time saving (reducing the work volume), understaffing and insufficient skills, to the deliberate and uncritical adoption of the review and numerous additional passages from the ***application.***

However, in a currently sensitive and scientifically highly controversial research area such as this, it is vital to work with extreme diligence and to locate and cite the original sources without exception, while here, in the case examined, descriptions of the second or even third order were copied.

All in all, the writers of the ***report*** must be **accused of significant scientific misconduct** and of **fulfilling all the definitional criteria of text plagiarism in the sense of conscious deception about the true authorship.**

That the rules of good scientific practice were not adhered to means that, in this case, the BfR obviously did not conduct its own assessment of the cited studies.

This is relevant because EU regulation requires that an independent, objective and transparent assessment be conducted: "*The rapporteur Member State shall make an independent, objective and transparent assessment in the light of current scientific and technical knowledge."*[12]

Moreover, a template published by the EU Commission (November 2012) points out that the comments and conclusions of the national rapporteur (RMS) need to be clearly marked out from the

[11] See also Armin von Weschpfennig (2012) on the delimitation and restrictions of the concept of plagiarism, in: Plagiate, Datenfälschung und kein Ende – Rechtliche Sanktionen wissenschaftlichen Fehlverhaltens, in: Humboldt Forum Recht, book 6. http://www.humboldt-forum-recht.de/deutsch/6-2012/beitrag.html

[12] http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32009R1107&from=en, Art. 11 ("Draft assessment report") para. 2. The expert assumes that those quality criteria also apply for the re-licensing application. He, however, recognizes that the legal details would need to be examined.

conclusions of the study author and the applicant. *"For each individual study, comments and conclusions of the RMS should be clearly identified and separated from the conclusions of the study author or applicant. It should be clearly indicated whether the RMS's conclusion deviates from the conclusion of the applicant or the study author."*[13]

Furthermore, State Secretary Peter Bleser of the German Federal Ministry of Agriculture and Food claimed that the BfR had undertaken its own assessment:

"'Volume 3' of the RAR at issue also contains only assessments of the analytical methods, the toxicology of the preparations and co-formulants, the application safety, the residue assessment written by the BfR employees, as well as studies published in scientific journals."[14]

And:

"The health-related risk assessment in the RAR is based solely on BfR's own assessment of all cited studies. In order to provide the greatest possible level of transparency, the 'Toxicology and Metabolism' chapter of the RAR also includes text passages taken from the pre-assessment by the 'Glyphosate Task Force'."[15]

The last sentence in the quote is contradictory. Transparency would have been possible only if the passages had been marked, but not when they merge with the continuous text.

Only a detailed examination of the entire report could show the extent to which other chapters in the ***report*** contained plagiarised text. The subject of this analysis was limited to the three subsections noted.

Cursory reading, however, shows that in other chapters a distinction has been made between continuous text printed in standard font, and *comments made by the RMS (Rapporteur Member States) in italics.*

[13] https://ec.europa.eu/food/sites/food/files/plant/docs/pesticides_ppp_app-proc_guide_doss_temp-assess-report_201211.pdf, Volume 3 – Annex B (AS), p. 18.
[14] http://dipbt.bundestag.de/doc/btd/18/054/1805455.pdf, p. 38. Answer to an inquiry of 29 June 2015.
[15] http://dipbt.bundestag.de/doc/btd/18/059/1805977.pdf, p. 40. Answer to an inquiry from September 7 2015.

4. Declaration of impartiality

The reviewer is an expert in analysing texts for plagiarism. He is the author of the book *Das Google-Copy-Paste-Syndrom. Wie Netzplagiate Ausbildung und Wissen gefährden* (EN: The Google copy &paste syndrome. How online plagiarism endangers knowledge and education, Heise, 2nd edition, 2008) and has documented over 150 cases of plagiarism in business, politics and journalism to this day. He has been preparing expert assessments and applying specialized software in this field since 2007. He has examined hundreds of texts ranging from dissertations and patent specifications, to project reports and expert opinions.

The expert does not have, and has not had any connection with the institutions and companies responsible for producing the texts examined here, and has drawn up this report according to objective parameters and scientific standards, and independently of any personal, political or economic influence. His plagiarism benchmark accords with standard teaching on the subject and the relevant court rulings.

This expert opinion was commissioned from the author by Global 2000 and was undertaken free of charge on the basis of the documentation provided to him by this organisation.

Yours faithfully,

Doz. Dr. Stefan Weber

Salzburg, 30 September 2017