

## Author and editors of glyphosate report reply to ECHA

On 13 July the European Chemicals Agency (ECHA) published a first response<sup>1</sup> to Global 2000's recent report on glyphosate, "Glyphosate and cancer: Authorities systematically breach regulations".<sup>2</sup>

Global 2000 and the author and editors of the report appreciate ECHA's response and the fact that ECHA welcomes "the scientific content" of our report and "the challenges it poses". We look forward to ECHA's full response, announced for early August 2017.

We also appreciate ECHA's transparency and openness in welcoming observers from NGOs at its meetings – an important step to promote public trust. But unfortunately, this did not prevent ECHA's risk assessment committee (RAC) from delivering a faulty cancer assessment of glyphosate. ECHA's assessment could be used to justify the authorization of the carcinogenic pesticide glyphosate in the EU for ten more years – and could put the health of more than 500 millions of Europeans at risk.

We did not intend to offend representatives from ECHA, RAC or any other authority. ECHA's accusation that we used "pejorative language" surprised us, because we do not believe that this is the case.

The main objective of our report was to demonstrate that the dossier submitter (BAuA) did not respect important parts of the CLP regulation on chemicals classification, as well as OECD and ECHA guidance – and that ECHA's RAC failed to correct these faults and repeated a number of them.

We based our argument on scientific principles, providing evidence for every claim we made. If these corrections were made, in our view they would inevitably lead to the conclusion that glyphosate should be classified as a category 1B carcinogen, according to the CLP regulation, and thus could not be re-approved in the European Union.

We contend that contrary to ECHA's suggestion, it is not the arguments presented in our report that undermine the trust of citizens in science and public servants. In our view, the loss of trust is due to the fact that public servants from the European authorities (BfR, EFSA, and ECHA) have failed to perform an appropriate and thorough cancer assessment of glyphosate. Initially they overlooked the vast majority of evidence for glyphosate's carcinogenicity in industry's unpublished studies. Later, after the evidence became obvious, they distorted the facts and breached relevant guidelines, failing to acknowledge an additional seven significantly increased tumour incidences in their documents.

- 1 ECHA (2017). Subject: Global 2000's report on glyphosate. 13 July.  
[https://echa.europa.eu/documents/10162/23294236/global\\_2000\\_glyphosate\\_echa\\_response\\_en.pdf/20f44bb9-be77-28aa-3691-07b1205406c7](https://echa.europa.eu/documents/10162/23294236/global_2000_glyphosate_echa_response_en.pdf/20f44bb9-be77-28aa-3691-07b1205406c7)
- 2 Peter Clausing (2017). Glyphosate and cancer: Authorities systematically breach regulations. Published by GLOBAL 2000 (Friends of the Earth Austria). Edited by Claire Robinson, Helmut Burtscher.  
[http://www.gmwatch.org/files/GLO\\_02\\_Glyphosat\\_EN.pdf](http://www.gmwatch.org/files/GLO_02_Glyphosat_EN.pdf)

The end result was that they concluded that glyphosate is not carcinogenic.<sup>3</sup> Therefore we believe that it is these actions and not our report that undermine public trust.

Recently BfR and EFSA were invited to engage in the scientific debate that they repeatedly asked for. A scientific article authored by Peter Clausing and published in February 2017 in a German peer-reviewed journal<sup>4</sup> concluded: "I request that BfR engage in the objective, science-based discussion that it has repeatedly called for, and that it either refute the five points raised in this critique or admit their correctness." In addition, a letter from Peter Clausing and Prof Christopher Portier to the editor<sup>5</sup> of the journal that published the paper defending EFSA's assessment by Tarazona et al. (2017) so far has not received any response from the authors, even though – according to the editor – they were invited to provide one.

Questions about the differences between the evaluations of glyphosate performed by WHO's cancer research agency IARC and Europe's regulatory authorities have remained unresolved for over two years. GLOBAL 2000 hereby proposes that it arrange a public scientific debate in Vienna between representatives of ECHA and representatives of IARC, and other scientific experts, where the diverging arguments can be exchanged and scrutinized.

We look forward to ECHA's positive response to this invitation.

Sincerely



Helmut Burtscher for Global 2000, Peter Clausing, and Claire Robinson

Vienna, 17 July 2017

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- 3 Portier CJ and Clausing P (2017). Re: Tarazona et al. (2017): Glyphosate toxicity and carcinogenicity: a review of the scientific basis of the European Union assessment and its differences with IARC. [Arch Toxicol.](#) 2017 Jun 15. doi: 10.1007/s00204-017-2009-7.
- 4 This article was subsequently translated into English by its author: [http://www.pan-germany.org/download/The\\_Carcinogenic\\_Hazard\\_of\\_Glyphosate.pdf](http://www.pan-germany.org/download/The_Carcinogenic_Hazard_of_Glyphosate.pdf)
- 5 Portier CJ and Clausing P. (2017).