

1. From: ECPA  
2. Sent: 11 April 2016 17:10  
3. Subject: Vote on Glyphosate Motion for Resolution/Objection - Thursday 14th April - ECPA  
4. position against the Motion/Objection

5. Dear Honourable Member of the European Parliament,

6.  
7. As I am sure you are aware, this Thursday the European Parliament will vote on a Motion for  
Resolution from the ENVI Committee: 'Objection pursuant to Rule 106: renewal of the approval  
of the active substance glyphosate'.

8.  
9. As representatives of the European Crop Protection Industry, we disagree with this Motion for  
Resolution and objection, for the following reasons:

10.

11. - The EU system for approval and renewal of active substances is governed by  
Regulation 1107/2009, and EFSA has the role of carrying out the scientific evaluation. The  
process and roles played by EFSA and the other regulatory bodies as established by the  
legislation must be respected by all institutions (EU and National).

12.

13. - It is paramount the European Parliament as the representative of EU citizens and  
co-legislator, who adopted this Regulation, both respect and protect the role of the agency  
and the regulatory authorities.

14.

15. - According to Regulation 1107/2009, the approval and renewal of active substances  
rely entirely on the assessments of the Rapporteur Member State (for Glyphosate it was  
Germany) and EFSA, and the decision of the Commission supported by a vote in the Standing  
Committee on Phytopharmaceuticals (SCoPAFF). It is the role of the European Parliament and the  
Council to ensure the legislation is respected.

16.

17. - IARC is not a body of the EU, and so it is not an official part of the EU decision  
making process when it comes to active substance approval or renewal, and the assessment  
process. However, IARC's work was also reviewed by EFSA in its assessments and did not prevent  
it from drawing a positive conclusion on Glyphosate, when considering all available scientific  
evidence. Furthermore, IARC monographs are not framed and drawn up in the context and format  
required for the EU approval & renewal process.

18.

19. - It must be noted that both Germany (as Rapporteur Member State) and EFSA considered  
Glyphosate as safe in their scientific evaluations, when used appropriately, and thus  
concluded that Glyphosate is not carcinogenic. Furthermore, residues in food and water are  
monitored by EFSA, and normally, samples tested for glyphosate residues are completely  
undetectable. In the vast majority of cases, where residues are present they are within  
legally permissible limits and well below the threshold which would pose a risk to human  
health.

20.

21. - Access to data & studies have been requested by NGOs and the Commission, with  
regard to this renewal dossier. Although understandable, there are legal measures in place to  
prevent the release of confidential business information when it comes to these substances in  
order to protect intellectual property and investment in innovation. This must be respected  
and borne in mind by the Parliament and others. These rules do not just apply to the  
pesticides industry, similar rules exist for biocides, industrial chemicals, and cosmetics,  
including fragrances. However, to address political and public concern, we believe our member  
companies involved are considering a mechanism for access to support this particular case.

22.

23. - Last but not least, the motion to object neglects the impact of such a measure on

EU agriculture. Pesticides are a vital tool in EU farmers' toolbox, and this includes products containing Glyphosate. We need our farmers to remain competitive, while ensuring the protection of human health and the environment.

24.  
25. It is important that MEPS and the Parliament protect the decision making process agreed for the approval and renewal of active substances, and fully support the role of EU scientific bodies which are regarded amongst the best in the World. We hope we can rely on your support in this matter.

26.  
27. Yours Sincerely,  
28.  
29. Jean Charles BOCQUET  
30. Director general