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Commissioner for Health and Food Safety
Cabinet of Commissioner Andriukaitis

BERL 8/366
B-1049 Brussels/ Belgium

May 26, 2016
Ref.: Glyphosate renewal application – draft regulation

Dear 5.1.2.e Woo

Thank you for the meeting yesterday. We appreciated your time to explain the situation regarding the status of the Renewal of Approval process for Glyphosate. We discussed that Glyphosate is a vital tool for farmers, providing economic and environmental benefits to all sized farms across the EU.

As we indicated during the meeting, the Glyphosate Task Force (GTF) strongly believes that neither a short term Approval, nor a further extension (prolongation) of the period of review under the current Approval is an acceptable option for the industry.

1. There are no valid scientific or legislative reasons for not granting a 15 year Approval.
    - The Glyphosate Task Force provided all information and documentation required for the assessment.
    - The Rapporteur Member State and the European Food Safety Authority have both concluded that there are no safety concerns which would prevent the Approval of Glyphosate. They also confirmed that there is no risk to consumers regarding carcinogenicity and other health effects.
    - Recently other major competent authorities have published reviews that reach similar conclusions (WHO JMPR, US EPA, Canada PMRA, Japan FSC, Australia PMVA).
2. Existing legislation stipulates that the European Commission can amend the Approval at any time if it considers that new information has become available which impact the conditions of Approval of an active substance.
    - The extension is, therefore, unnecessary
    - The hazard classification of Glyphosate is already under review by the European Chemicals Agency, and its classification may be amended according to the outcome.
    - Data on potential for endocrine effects are already required by the draft Regulation proposed to SCoPAFF to address the EFSA opinion that "although experts agreed that there is no evidence for endocrine mediated effects for Glyphosate", a firm conclusion cannot be reached now and a data gap is proposed".
3. An extension would delay the re-registration of products at Member State level and create additional burden on the industry and on the Member States to extend existing registrations.

- Renewal of existing registrations is currently under a different set of data requirements and technical guidance documentation to that which would be applicable when re-registration is required after the extension of renewal, so current extensive and expensive dossiers will have to be revised again.

4. An extension would prolong the current uncertainty with no clear outcome or predictability and would probably lead to further uncertainty for and disruption of the markets.
5. There is a legal proceeding at the ECJ concerning the first extension of Approval of List 2 substances, and another extension would likely increase the legal pressure to the detriment of the legal framework
6. There is no reason to believe that the extension will make the granting of Approval any easier.

In conclusion, the GTF believes that an extension is not necessary given the clear case for Approval and can be a bad outcome and precedent for all stakeholders. Based on the provisions of Regulation 1107/2009 and the detailed assessment carried out, approval for 15 years remains the most appropriate outcome,

We trust that you will find our comments constructive towards achieving the Renewal of Approval of Glyphosate within the deadline of 30 June 2016, and remain at your disposal should you have any need for further information.

Yours sincerely,

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