







Members of the ENVI and the EMPL Committees of the European Parliament

Date 31 August 2023 Our reference 23-083/KJ/PB/MS/tvm Subject Renewal glyphosate's license Extension number +31 6 11379098 Email address marike.schooneveldt@fnv.nl Annex

Dear Members,

With this letter, the Dutch Trade Union Confederation FNV would like to express its profound concerns about the current developments in the EU assessment of glyphosate. We would like to draw your attention to the current proposal for a reapproval of glyphosate's license by 15 years. We think that reapproval of glyphosate's license is the wrong choice and we ask you to prevent this from happening. Underneath, we will explain why we get to this conclusion.

Glyphosate is an active substance that is widely used in herbicide products. Glyphosate-based pesticides (formulations containing glyphosate and other chemicals as co-formulants) are used in agriculture and horticulture to combat weeds that compete with cultivated crops, and in the maintenance of railway lines, amongst other uses.

Glyphosate is currently approved for use in the EU until 15 December 2023. It is planned to present a renewal Regulation proposal at the ad-hoc Standing Committee of Plants Animals Food and Feed (SCoPAFF) on the 15<sup>th</sup> of September and invite the Member States to vote at the 11-12<sup>th</sup> October ScoPAFF meeting. The current proposal is a renewal of glyphosate's license by 15 years, despite the fact that the maximum term for extension of substances like glyphosate is said to be 10 years on the webpage of the European Chemicals Agency (ECHA).

In April 2023, the FNV, together with Natuur & Milieu, the Parkinson Vereniging and the Parkinsonalliantie Nederland, already issued a social manifesto on pesticides, in which we listed our concerns<sup>1</sup>. Thereafter, the European Food Safety Authority (EFSA) published a *Peer review of* 

<sup>&</sup>lt;sup>1</sup> Manifest-Bestrijdingsmiddelen 1.pdf (fnv.nl)

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the pesticide risk assessment of the active substance glyphosate on 26<sup>th</sup> of July<sup>2</sup>. However, EFSA has acknowledged that there are outstanding issues in relation to missing data for co-formulants and regarding the impact of glyphosate use on biodiversity, neurotoxicity, and microbiome health. The assessment could not be finalized on all elements. Noteworthy is that EFSA itself found that the current pesticide approval policies are insufficient to assess the risk of neurodegenerative diseases, such as Parkinson's disease.

Furthermore, glyphosate is classified as probably carcinogenic to humans by the WHO's International Agency for Research on Cancer and by the Belgian Superior Health Council. Additionally, several scientific studies link glyphosate with Parkinson's disease, as well as having negative effects on the microbiome in its entirety. For the FNV, it is unacceptable for workers to be exposed to a substance where there is so much doubt about possible negative health effects. The precautionary principle should be applied here.

Note also that glyphosate is highly damaging to biodiversity, including aquatic life and bees and it is a major problem substance for drinking water extraction from groundwater. This is set against a background wherein the European Commission proposes to reduce the use and risk of chemical pesticides by 50% in 2030. The Nature Restoration Law aims to restore degraded nature for at least 20% of all land and sea areas in the EU. In this perspective, since glyphosate is the most widely used pesticide of all pesticides, the extension of the license could sincerely undercut reaching this ambition.

All these points make that the FNV has serious concerns whether the renewal of glyphosate's license should be extended, let alone for the duration of 15 years. For these reasons, we would like to ask you to question the European Commission why the decision will be made for to extend glyphosate's license, whilst it is clear up front that there are information gaps in the research on which this decision should be based.

In addition, we would like to call upon you to alert your national party colleagues who are spokespersons on social affairs and employment, public health and agriculture, nature and food quality, since national governments will have to cast their vote on the extension in September and October.

We take the position it is better to ban glyphosate as long as there is doubt and unclarity about the possible harmful effects of this pesticide on health and/or the ecosystem. Prevention is far better than cure. It also helps the European Commission's objectives to reduce the use of chemical pesticides. Alternatives, like mechanical weeding and strip farming, already exist.

In case it is not possible to stop glyphosate's license renewal in total at this stage anymore, then at least advocate for a limited renewal period, of maximally two years, under strict conditions.

<sup>&</sup>lt;sup>2</sup> <u>Peer review of the pesticide risk assessment of the active substance glyphosate | EFSA (europa.eu)</u>

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In any event, further research into missing data and in particular additional research into the risk of neurodegenerative diseases en effects on the microbiome should be commissioned.

We hope we can count upon your involvement. Thank you in advance for your consideration.

Best regards,

Kitty Jong Vice President FNV

Petra Bolster-Damen International Secretary, General Board Member FNV

(R. Milbur)

Rob van Tilburg Director of Programs Natuur & Milieu

Nickie van der Wulp Director Parkinson Vereniging

Jan van Zijl President Parkinsonalliantie