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Subject: Re: The Year of the Bumblebee. How the regulators made false claims about glyphosate
Reply-To: R MASON <rosemary.mason01 (b) (6)>

Dr José V
Tarazona

Head of the Pesticides Unit
European Food Safety Authority
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Dear Dr Tarazona

Thank you for your e-mail of 29 January 2016. I am not surprised to hear that EFSA has found 'data gaps' in the RMS's environmental assessment. I sent EFSA's Executive Director a copy of our photo-journal The Year of the Bumblebee for a very good reason. This is a 10-year study of the effects of Roundup® sprayed on Japanese knotweed (some miles away) on a small nature reserve **in a REAL LIFE situation**. According to hydrologists in the US Geological Survey (USGS) glyphosate and its degradation product AMPA occur frequently and widely in U.S. Soils, surface

water, groundwater, and precipitation sampled "between 2001 and 2010 from 38 states." Levels in farmland have correlated with losses of biodiversity. Our reserve in the UK is approaching what Craig Childs described as **a biological desert** (when he spent a long weekend in a farm which grew Monsanto's and Dow's GE herbicide-resistant crops).

What is more, **unlike all the Regulatory Agencies which claim 'sound science'**, we (and the USGS) have actually measured glyphosate levels. In 2013, the level of glyphosate in one Welsh river draining from areas of Japanese knotweed spraying was 190 parts per trillion (ppt) and local tap water was 30 ppt. These were of the order of concentrations found in a study in 2013 which showed that breast cancer cell proliferation is accelerated by glyphosate in extremely low concentrations: "The present study used pure glyphosate substance at log intervals from 10^{-12} to 10^{-6} M. These concentrations are in a crucial range which correlated to the potential biological levels at part per trillion (ppt) to part per billion (ppb) which have been reported in epidemiological studies."

Here is a single document that shows that the European Food Safety Authority, the European Commission, the British Government and Defra are colluding with the Agrochemical Industry

The **Open Letter from America** was from 60 million American citizens to David Cameron (and the EU) warning them not to authorize GM crops because of the devastating effects on human health and the environment. It was delivered to 10 Downing Street on 11 November 2014.

Here are extracts: "In our country, GM crops account for about half of harvested cropland. Around 94% of the soy, 93% of corn (maize) and 96% of cotton grown is GM. The UK and the rest of the EU have yet to adopt GM crops in the way that we have, but you are currently under tremendous pressure from governments, biotech lobbyists, and large corporations to adopt what we now regard as a failing agricultural technology...Studies of animals fed GM foods and/or glyphosate, however, show worrying trends including damage to vital organs like the liver and kidneys, damage to gut tissues and gut flora, immune system disruption, reproductive abnormalities, and even tumors.³⁵...These scientific studies point to potentially serious human health problems that could not have been anticipated when our country first embraced GMOs, and yet they continue to be ignored by those who should be protecting us. Instead our regulators rely on outdated studies

and other information funded and supplied by biotech companies that, not surprisingly, dismiss all health concerns..."

"Through our experience we have come to understand that the genetic engineering of food has never really been about public good, or feeding the hungry, or supporting our farmers. Nor is it about consumer choice. Instead it is about private, corporate control of the food system.

Americans are reaping the detrimental impacts of this risky and unproven agricultural technology. EU countries should take note: there are no benefits from GM crops great enough to offset these impacts. Officials who continue to ignore this fact are guilty of a gross dereliction of duty."

Most of the countries in the EU took that advice and opted out of GM (including Scotland, Wales and Ireland).

David Cameron ignored that advice on behalf of England. He and Defra concealed the letter from the British public. The European Commission and the European Food Safety Authority ignored it as well and have continued to approve GM Crops for growing and for food and feed in the EU.

Approval has continued, despite these grave warnings from American citizens of their experiences (Living with GMOs) and from independent organisations in Europe, such as Testbiotech (Germany), CRIIGEN (France), Corporate Europe Observatory, Earth Open Source and Pesticides Action Network.

Gottfried Glöckner & Gilles-Éric Séralini published new scientific data on Bt toxins and a thorough study of the records show that this GMO Bt maize is most probably toxic over the long term. Press Release: 25/01/2015.

Pathology reports on the first cows fed with Bt176 maize (1997-2002)

"Over the years, and coinciding with regular increases in GMO content of the diet (0-40%), the proportion of healthy cows with high milk yield diminished from 70% (normal rate) to only 40%. At the peak of mortalities in 2002, 10% of the cows died, preceded by a long-lasting paresis syndrome without hypocalcemia or fever, but with kidney biochemical failure and mucosa or epithelial problems." The only toxicological test, before being commercialized, was conducted by Novartis (subsequently Syngenta) in the United States, and consisted of feeding 4 cows for 15 days; one cow died after a week. This early GM maize Bt176 produced an insecticidal Bt toxin and contained an antibiotic resistance marker gene. Prof Séralini had access to the veterinary records as well as the farmer's archives.

The Science Media Centre (sponsored by corporations such as Monsanto, BP, Syngenta, AstraZeneca and the Nature Publishing Group) together with the UK media, are silent.

The world is being drowned in unsafe and untested chemicals to which we are all exposed

It has been estimated that there are more than 100,000 toxic substances in commercial use and approximately 2,300 new chemicals developed and submitted for registration every year. "The capacity of industry to produce chemical substances outstrips research."

Glyphosate usage on crops in the US has increased from 25 million pounds since 1996 (when GM crops started) to 300 million pounds in 2012. There are usage graphs for 456 other agrochemicals used by US farmers. But only in 39 are the levels being monitored. These 39 do not include glyphosate or the neonicotinoid insecticides. It is the same in Europe.

The human race has learned nothing since 'Silent Spring'

The global pesticides industry has been allowed to dominate the regulatory agencies. They have created chemicals of mass destruction that can no longer be controlled. Furthermore, successive British and US governments have allowed themselves to be persuaded that only a chemical-based agricultural system can feed the world.

Fifty-four years ago Rachel Carson's description of systemic pesticides was correct; nothing has changed apart from the fact that industry has devised more powerful and persistent weapons.

Rachel Carson wrote:

"The world of systemic insecticides is a weird world, surpassing the imaginings of the brothers Grimm. It is a world where the enchanted forest of the fairy tales has become a poisonous forest. It is a world where a flea bites a dog and dies...where a bee may carry poisonous nectar back to its hive and presently produce poisonous honey".

Defra had denied that cancers, neurological conditions and allergic symptoms affecting rural residents living next to fields were due to exposure to pesticides sprayed by farmers. In its calculations of exposure it considered 'residents' to be the same as 'bystanders'.

However, in November 2008, Georgina Downs Pesticides UK campaign had a landmark victory in the High Court that ruled that the UK Government's policy on pesticides was not in compliance with European legislation. Eight months later it was overturned when the Government appointed another judge.

Bystander Risk Assessment Working Group (BRAWG) undertook a review of the Health and Safety Executive's regulatory risk assessments for bystanders and residents who are potentially exposed to pesticides. In its response to the review the UK government did nothing, but said: *We will work closely with the European Food Safety Authority to ensure that those BRAWG recommendations are used in developing the EU approach to risk assessment for bystanders and residents.*

EFSA caved in to pressure from the Pesticides Industry. The European Crop Protection Association wrote 88 comments on the draft. In particular they objected to including residents in the acute exposure assessments. They claimed it was covered by the acute exposure of bystanders.

In November 2014 EFSA published: Guidance on the assessment of exposure of operators, workers, residents and bystanders in risk assessment for plant protection products in which it: *"sets out for the first time a harmonised methodology for calculating exposure to pesticides for four major population groups".* It added that *"the methodology is designed to help risk assessors and industry applicants evaluate the risk" to these exposure groups, and as a result, it "increases protection for operators, workers, residents and bystanders."*

Georgina Downs of Pesticides UK campaign claimed the guidance was negligent and unlawful: *"ECPA (the European Crop Protection Association - the body that represents the pesticides industry in Europe) strongly objected to the inclusion of the acute exposure assessment for residents. ECPA asserted that it was "redundant to assess the acute exposure and risk for residents as proposed in the guidance, as this is covered by the acute assessment for the bystander exposed to substances." ECPA went on to propose that for residents there should be a long term exposure assessment only.*

So as a result of EFSA's allowing the pesticides industry to have the last word: *"many millions of people who live near conventionally farmed cropland have absolutely no protection at all from exposure to the cocktails of poisons sprayed on fields in the locality of residents' homes, schools, children's playgrounds, nurseries, hospitals, amongst other areas."* The Civil Servant who had helped to defend the Government in the High Court in 2008 and had drafted the harmonised regulations in EFSA was given an MBE in the New Year's Honours for 'services to the regulation of pesticides'.

Will the global élite survive the contamination of the environment with pesticides?

The global élite may be able to survive by eating organic food, but not the pollution of water, soil and air by genotoxic and teratogenic herbicides, insecticides and other industrial chemicals. Governments and Regulators only measure a small fraction of them.

The chemical industry has created a toxic environment from which none can escape. The devastating effects of these silent killers in our environment do not distinguish between farmers or city dwellers, the wealthy or the poor, between media moguls, editors or their reporters, Monsanto, Syngenta or Bayer Executives, Prime Ministers or Presidents. The recent episodes of extreme weather and severe flooding caused by climate change merely spreads the chemicals further.

Cancers and moderns diseases have been affecting people in towns through food and water and pesticides sprayed on weeds for a number of years, but the industry and lobbyists are burying it Many people now are failing to reach the biblical age of "three-score-years-and-ten" because they are dying of cancer and other diseases before that. This is a result of exposure to biocidal chemicals.

Attached is a document:

Glyphosate causes cancer and birth defects. Humans are being poisoned by thousands of untested and unmeasured chemicals

<http://onlinelibrary.wiley.com/doi/10.1111/jawr.2014.50.issue-2/issuetoc>
www.theletterfromamerica.org
https://twitter.com/beyond_gm/status/532224079605288960
<http://scholarly-journals.com/sjas/archive/2016/January/pdf/Gl%20ckner%20and%20S%20eralini.pdf>
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http://www.theecologist.org/News/news_analysis/2661835/negligent_and_unlawful_efsas_la_test_guidance_on_pesticide_use_and_exposure.html
http://www.theecologist.org/News/news_analysis/2986890/disgraceful_honour_for_failing_to_protect_people_from_poisons.html

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Cc: URL Bernhard <Bernhard.URL@efsa.europa.eu>

Sent: Friday, 29 January 2016, 14:08

Subject: RE: The Year of the Bumblebee. How the regulators made false claims about glyphosate

Dear Dr. Mason,

Thank you for your e-mail and letter from 18 January 2016 addressed to the EFSA Executive Director.

Your points have been noted, but please consider that in reality, we have identified in the EFSA Conclusion a set of issues regarding the environmental risk assessment of glyphosate.

In particular, we have identified data gaps (Section 7 of the EFSA Conclusion) regarding the degradation rate of the major metabolite AMPA in soils with pHs in the acidic range, the contamination route through run-off and subsequent surface water contamination and bank infiltration to groundwater, the risk to small herbivorous mammals and the long-term risk assessment for insectivorous birds for some representative uses. Not unexpected for an herbicide, we have identified the need for mitigation measures (Section 8 of the EFSA Conclusion) including drift reduction and/or in-field no-spray buffer zone regarding the risk to terrestrial non-target plants for all the representative uses. We have also identified risk to wild non target terrestrial vertebrates for four out of the five representative uses assessed in the EFSA Conclusion (Section 9.3 of the EFSA Conclusion).

You may also be interested to know that in an effort to clarify scientific divergences – and in line with EFSA's principles of openness and transparency – EFSA and the International Agency for Research on Cancer (IARC) have agreed to meet next month to discuss the different evidence and the different methodologies that the two organisations have used in their assessments of glyphosate.

Yours sincerely,

Dr José V. Tarazona
Head of the Pesticides Unit