

CC(16)4732:1 – CG/al

Commissioner Vytenis Andriukaitis  
Health and Food Safety  
(SANTE)  
European Commission  
Rue de la Loi, 200  
BE-1049 Brussels

Brussels, 25<sup>th</sup> May 2016

**Re:      Renewing the approval of the active substance glyphosate in accordance with Regulation 1107/2009**

Dear Commissioner,

Copa and Cogeca are very concerned about the recent developments regarding the renewal of the approval of the active substance glyphosate. Failing to deliver would pose a serious threat to our competitiveness with severe consequences.

First of all, we believe that it is essential to build confidence in the European food safety system by strengthening the role of the European Food Safety Authority (EFSA) to protect consumers by providing scientific advice on risks along the food chain.

EFSA provides independent, transparent and professional scientific assessment. Therefore, Copa and Cogeca are and have always been strong supporters of the mission and objectives of EFSA ever since its inception. In this respect, the EU Institutions and Member States also have a key role to play to support our strong scientific Authority.

Based on the European General Food Law principles, Regulation 1107/2009 establishes the procedure to place plant protection products on the market. In this procedure EFSA plays a key role by ensuring a consistent evaluation of active substances.

Indeed, in the case of glyphosate, EFSA concluded that the substance is unlikely to pose a carcinogenic hazard to humans<sup>1</sup>.

Furthermore, we would like to remind you that the European Parliament approved a Motion for Resolution calling for the renewal of glyphosate<sup>2</sup>.

Glyphosate is an active substance widely used in herbicides, across the sectors and Member States to fight weeds that compete with crops. Withdrawing this active substance may have a negative impact on the climate and land use. Indeed, glyphosate substantially reduces the need to till, which contributes to less greenhouse gas emissions and soil erosion.

No-till or minimum tillage are some of the tools to contribute to sustainable agriculture. For these practices, chemical control is a prerequisite to allowing farmers to sow. These conservation practices help protect the soil from degradation and can improve soil fertility and structure, result in lower fuel consumption and reduction of greenhouse gas emissions. Mechanical weed control implies high fuel consumption and, therefore, higher contribution to climate change.

---

<sup>1</sup> [https://www.efsa.europa.eu/sites/default/files/scientific\\_output/files/main\\_documents/4302.pdf](https://www.efsa.europa.eu/sites/default/files/scientific_output/files/main_documents/4302.pdf)

<sup>2</sup> <http://www.europarl.europa.eu/sides/getDoc.do?type=TA&language=EN&reference=P8-TA-2016-0119>

Finally, glyphosate is also used in agriculture and non-agriculture as an important tool to fight against Invasive Alien Species (IAS). As the European Commission has already acknowledged, IAS are recognised as one of the direct drivers behind the loss of biodiversity<sup>3</sup>.

As for the single market, glyphosate provides three main benefits: it is authorised in all Member States; it has a wide range of uses that can be adapted to different production conditions; and it is sold at a cost-effective price. At the moment, there is no single alternative that meets all of these criteria.

Due to its benefits and wide use, withdrawing this active substance would create serious market disruptions in several agricultural sectors in the EU, thus jeopardizing the competitiveness of European farmers in the global market. This will be particularly important for the cereal sector.

Finally, Copa and Cogeca would like to underline that not approving the active substance would, in fact, benefit third countries that export to the EU, as the substance would still be part of farmers' toolbox in third countries. This would be a clear competitive disadvantage for European agriculture.


Therefore, Copa and Cogeca urge the Commission to take into account European farmers concerns and to proceed accordingly to the renewal of approval. Not delivering would jeopardise confidence in the whole EU food safety system and, in particular, in EFSA's role.

We hope that these comments will be granted for your fully consideration. Please note that a copy of this letter has been sent to your colleagues Commissioner Phil Hogan and Commissioner Cecilia Malmström.



We remain at your disposal should you have any points to clarify.

Yours faithfully,



  
 of Copa



  
 of Cogeca

---

<sup>3</sup> [http://ec.europa.eu/environment/nature/biodiversity/strategy/index\\_en.htm](http://ec.europa.eu/environment/nature/biodiversity/strategy/index_en.htm)