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Subject: Global 2000's report on glyphosate

ECHA is aware of Global 2000's report and is looking at the detail now. We will respond in full in early August and we will also publish that response.

ECHA encourages and welcomes scientific debate and challenge – it is fundamental to our work. We therefore welcome the scientific content of the report and the challenges it poses in terms of – for example – the use of statistical methodology.

However, we most strongly refute the allegation made in title of the report and the pejorative language used within it.

ECHA was created to achieve one goal – the safer use of chemicals, by protecting human health and the environment from their potentially toxic effects. To suggest that we systematically do otherwise or collude to subvert the very reason for our existence is not only wrong, but completely without justification. We also regret the contribution such language makes to maligning the trust of citizens in science and public servants. This is extremely unhelpful.

The evidence of our rigour, transparency and openness to discussion is visible on our website. Our welcome to scientific debate is one of the reasons why stakeholders – including the author of the GLOBAL 2000 report in the case of glyphosate – are routinely invited to participate in all our Committee meetings.

ECHA has invited the stakeholder organisation represented by Dr Clausing to attend ECHA's Risk Assessment Committee (RAC) meetings and their scientific views and approach were presented by Dr Portier and considered in the RAC in December 2016 and March 2017. Dr. Clausing attended the plenary meetings in which glyphosate was discussed and used the opportunity to contribute his interventions to these meetings. Dr Portier also raised some of these issues in his letter to President Juncker in May 2017. ECHA and EFSA's response is publicly available here. Dr Clausing also kindly agreed to be interviewed by ECHA for a video explaining the process of harmonising the classification of glyphosate.

We remain confident that the dossier submitter (BAuA) and RAC have correctly followed not only all of the legal steps but also the best practice during the process to harmonise the classification and labelling of glyphosate, respecting the CLP Regulation as well as all the OECD and ECHA's own guidance.

RAC's independent scientific experts assessed glyphosate's hazardous properties, including carcinogenicity, against the criteria in the CLP Regulation. They considered all the scientific data in coming to their opinion, including both published scientific studies and industry data that RAC considered relevant. The Committee used a weight of evidence approach in its assessment, as required by the CLP Regulation. The EU Member States and the European Commission are currently considering RAC's independent scientific opinion as they decide whether to renew the approval for glyphosate as a pesticide or not.

The classification of chemical substances is based solely on the hazardous properties of the substance. It does not take into account the likelihood of exposure to the substance and, therefore, does not address the risks of exposure. The risks posed by exposure are considered

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under the relevant downstream pieces of legislation, such as the Plant Protection Products Regulation in the case of glyphosate.

Background information:

ECHA is responsible for managing the harmonised classification and labelling (CLH) process for hazardous chemical substances. This process and each step in it are outlined in detail in the Guidance on the preparation of dossiers for harmonised classification and labelling, and are consistent with the requirements of the CLP Regulation and in the rules of procedure of ECHA's Committee for Risk Assessment (RAC).

Active substances in plant protection products (PPPs) are normally subject to harmonised classification and labelling. As part of the procedure for the renewal of approval for glyphosate under the PPP legislation, the German Federal Institute for Occupational Safety and Health (BAuA) submitted a harmonised classification and labelling proposal to ECHA in May 2016. A Member State competent authority triggers the CLH process for an active substance by submitting a proposal for harmonised classification to ECHA.

ECHA followed the procedure as defined in the regulation. After checking that the dossier was in accordance with requirements, ECHA organised a 45-day public consultation on the German proposal (from 2 June to 18 July 2016). The results of this consultation are publicly available here: https://echa.europa.eu/harmonised-classification-and-labelling-previous-consultations/-/substance-rev/13838/term

To increase the transparency of the process, there was exceptionally a preparatory discussion in RAC on glyphosate on 7 December 2016, when the committee heard six presentations from interested parties on the topic, including NGOs. These presentations are available here: https://echa.europa.eu/-/the-committee-for-risk-assessment-starts-discussing-the-harmonised-classification-for-glyphosate.

ECHA published RAC's full opinion on classification of glyphosate on 15 June 2017. https://echa.europa.eu/-/echa-s-opinion-on-classification-of-glyphosate-published.

More information on ECHA's work on glyphosate is available here: https://echa.europa.eu/chemicals-in-our-life/hot-topics/glyphosate