

### General Comments:

The discussion about Glyphosate in the EU is not a scientific discussion, but the result of lobbying for the chemical industry, and in particular by the glyphosate producers:

Monsanto, Syngenta, BAYER AG, BASF and others. This is not a secret but a well-known and researched fact in the public media. I am not a scientist nor a member of a NGO or in any way related to the chemical industry but a very concerned consumer from Germany who researched a lot about this topic. I am not a biologist nor a natural scientist and probably don't use the toxicological or scientific terms correctly, but I have attached and cited all the resources for my arguments and complaints.

### Specific Comments:

#### Table of Content:

1. Over 750 studies prove the toxic effects of glyphosate
2. The vague academic methods of the German BfR
3. The WHO under the influence of the glyphosate producers
4. The JMPR and its experts under the influence of the glyphosate producers
5. The FAO under the influence of the glyphosate producers
6. Efsa experts paid by the glyphosate producers
7. Monsanto hides his secret glyphosate studies with the help of the authorities
8. The German BfR and its experts under the influence of the glyphosate producers
9. FAO experts are paid by the glyphosate producers
10. Monsanto's past and actual lawsuits for hiding the toxic effects of their products
11. Monsanto's vague claims about glyphosate
12. The different maximum values of glyphosate in food are not scientifically verified
13. Glyphosate residues found in over 75% of the population
14. Some supposable glyphosate effects on wild animals
15. The effects of glyphosate on the biodiversity
16. The short and long term effects of the nearly 100 different herbicides formulas with glyphosate are not fully researched
17. Conclusion and claims

## 1. Over 750 studies prove the toxic effects of glyphosate

It is already well researched in over 750 scientific studies and publications that glyphosate is toxic for humans, animals and the ecosystems. These 750+ studies are available via the NGO platform GMO Free USA:

<http://www.gmofreeusa.org/research/glyphosate/glyphosate-studies/>

These glyphosate studies and articles are published and peer-reviewed by other scientists.

The IARC has evaluated these independent (not-paid by the glyphosate producers) studies from international researchers with 17 scientists for one year just in search of proof of the carcinogenic effects of glyphosate on the human body.

## 2. The vague academic methods of the German BfR

The German BfR in contrast just – or mainly – reviewed unpublished secret glyphosate studies from the glyphosate producers. The BfR also used letters to the editors from glyphosate users as scientific studies, as the German newspaper Die Sueddeutsche revealed: (Only in German available) <http://www.sueddeutsche.de/wirtschaft/kampf-um-glyphosat-wenn-leserbriefe-von-monsanto-als-studien-gelten-1.2570374>

Furthermore, the BfR marked a lot of studies that prove the carcinogenic effects of glyphosate as irrelevant, not reliable or false. These are mistakes by the BfR in favor of the chemical industry, because these studies use correct scientific methods and are actually relevant: This is also documented in various TV reports (only in German available): The German ZDF Frontal 21 report via youtube: [https://www.youtube.com/watch?v=GdZ4b\\_5cDRQ](https://www.youtube.com/watch?v=GdZ4b_5cDRQ)

And the German ARD report: <http://www.ardmediathek.de/tv/Europamagazin/Das-Geschäft-mit-dem-umstrittenen-Herbiz/Das-Erste/Video?bcastId=342024&documentId=31161846>

The German BfR admitted in their secret study that they didn't review all of the 1200 glyphosate studies from the glyphosate producers, but the BfR simply adopted the results of 850 studies without a re-evaluation. And these studies are initiated and paid by the glyphosate producers. The details can be found in this interview with the German politician

Harald Ebner (Bündnis 90 / Die Grünen). Only in German available via Euronews:  
<http://de.euronews.com/2016/06/30/mdb-ebner-zu-glyphosat-risiko-der-krebsgefahr/>

Also, 96 international scientists claimed in an open letter by Prof. Christopher J. Portier to the EU Commissioner of Health & Food Safety, Mr. Vytenis Andriukaitis, that the methods used by the German BfR are not academic comprehensible. This letter can be found via Efsa Europe:  
[https://www.efsa.europa.eu/sites/default/files/Prof\\_Portier\\_letter.pdf](https://www.efsa.europa.eu/sites/default/files/Prof_Portier_letter.pdf)

The 250 delegates from the 119. Deutschen Ärztetages 2016 that represent all the doctors in Germany demand from the German government and the EU commission the ban of herbicides that contain glyphosate.

This info can be obtained via the official site of the German Bundesärztekammer: <http://www.bundesaerztekammer.de/ueber-uns/landesaerztekammern/aktuelle-pressemitteilungen/news-detail/aerzte-fordern-widerruf-der-glyphosat-zulassung/>

Dr. Peter Clausing from the Pestizid Aktions-Netzwerk e.V. (PAN Germany) also analyzed and criticized the method adopted by the BfR to examine the carcinogenic effects on mice, which the BfR marked as irrelevant.

This report, which is only available in German, can be obtained via the official site of the Austrian NGO Global2000:  
<https://www.global2000.at/sites/global/files/Analyse%20Dr.%20Peter%20Clausnig.pdf>

And Prof. Dr. Eberhard Greiser criticized the methods used by the BfR and Efsa too:  
This report, which is only available in German, can be obtained via the official site of the Austrian NGO Global2000:  
[https://www.global2000.at/sites/global/files/Gutachten\\_Prof.Greiser\\_Glyphosat\\_Studien.pdf](https://www.global2000.at/sites/global/files/Gutachten_Prof.Greiser_Glyphosat_Studien.pdf)

Another group of eight scientists, namely, Michael Antoniou, Mohamed Ezz El-Din Mostafa Habib, C. Vyvyan Howard, Carlo Leifert, Rubens Onofre Nodari, et al. have published a 52-page long scientific in-depth review of the non-scientific methods of the BfR. The group reviewed also the independent glyphosate studies in search of birth defects and found evidences:

This full-report, Roundup and Birth Defects, can be obtained via the publication website Scribd: <https://de.scribd.com/doc/57277946/RoundupandBirthDefectsv5>

3. The WHO under the influence of the glyphosate producers

The World Health Organization (WHO), which also claimed that glyphosate is non-carcinogenic, non-toxic for humans, animals and the eco-system works and acts under industry influence. A German TV report revealed that the WHO got 75% of their annual budget, which is 3 billion dollar from the industry in 2011, and in particular directly from glyphosate producers like Syngenta, BAYER and others.

The German ZDF TV reportage can be watched here via youtube (only in German):

<https://www.youtube.com/watch?v=vtuFi0O5rjQ>

The WHO is also funded indirectly by Monsanto because the Bill and Melinda Gates Foundation Trust owns a big share of the glyphosate producer Monsanto.

This info can be obtained via the NGO Wiki: Source Watch

[http://www.sourcewatch.org/index.php/Bill\\_%26\\_Melinda\\_Gates\\_Foundation](http://www.sourcewatch.org/index.php/Bill_%26_Melinda_Gates_Foundation)

And the Gates Trust paid the WHO over 400 million dollars in 2011.

This info can be found via Global Health Policy:

<http://www.globalhealthpolicy.net/?p=826>

Also in 2015, the WHO still got funded from the:

Bill and Melinda Gates Foundation Trust: 185 million dollars

Glyphosate Producer Bayer AG: 0.6 million dollars

Glyphosate Producer Syngenta : 160, 000 dollar

Glyphosate Producer BASF: 130, 000 dollar

All Infos via World Helath Organization: [http://www.who.int/about/finances-accountability/reports/A69\\_INF3-en.pdf?ua=1](http://www.who.int/about/finances-accountability/reports/A69_INF3-en.pdf?ua=1)

And when acknowledging the many decisions the WHO made in the past in favor of some industry companies, as Soren Ventegodt revealed in this article in the Journal for Integrative Medicine & Therapy:

<http://www.avensonline.org/wp-content/uploads/JIMT-2378-1343-02-0004.pdf>

or the journalist, Anne Kleinknecht, in this German TV report:

<http://www.br.de/nachrichten/who-pharma-industrie-100.html>

all the above fundings by the glyphosate producers are in fact not in compliance with the ethical standards of the WHO which states:

*"Funds may be accepted from commercial enterprises whose business is unrelated to that of WHO, provided they are not engaged in any activity that is incompatible with WHO's work."*

Why, because the WHO actually does judge and has judged in favor of particular companies and not in favor of the health of the people in the world.

These infos about the WHO have been revealed by this German ZDF TV report: (Only available in German):

<https://www.youtube.com/watch?v=vtuFi0O5rjQ>

#### 4. The JMPR and its experts under the influence of the glyphosate producers

The WHO expert committee, JMPR, which claimed that glyphosate is harmless to the human body is also heavily influenced by the industry as this German ARD TV report revealed: (Only available in German)

<https://www.youtube.com/watch?v=gB3pFQQHJil>

Furthermore, the JMPR has seven experts who get paid – directly or indirectly – by the glyphosate producers, as this article by Stéphane Horel reveals, via Environmental Health News:

<http://www.environmentalhealthnews.org/ehs/news/2016/june/endocrine-disrupters-final-maneuvers-by-brussels2019-industry-linked-scientific-community>

Here are a few examples from the article:

Prof. Dr. Helmut Greim is a member of the Monsanto Expert Group and gets paid by Monsanto. Helmut Greim works also for the European Centre for Ecotoxicology and Toxicology of Chemicals (ECOTEC). The members of the ECOTEC that are paid for their work as experts and consultants are the glyphosate producers: Syngenta, BAYER, BASF, Dow Chemical and others. This info can be obtained via the ECOTEC website:

<http://www.ecetoc.org/ecetoc-membership/member-companies/>

Also, Colin Berry, Alan Boobis, Daniel Dietrich, and Richard Sharpe are experts who get paid by the glyphosate producers as stated in the above Environmental Health News article.

Also, Wolfgang Dekant, the German professor of toxicology at the University of Würzburg (Germany) works as a paid expert for the ECOTEC:

<http://www.ecetoc.org/wp-content/uploads/2014/08/>

[ECETOC\\_WR\\_27\\_Expert\\_panel\\_to\\_better\\_understand\\_endocrine\\_disrupter\\_low\\_doses\\_effects.pdf](http://www.ecetoc.org/wp-content/uploads/2014/08/ECETOC_WR_27_Expert_panel_to_better_understand_endocrine_disrupter_low_doses_effects.pdf)

Wolfgang Dekant works also for ILSI Europe:

<http://ilsi.eu/task-forces/food-safety/packaging-materials/>

And the ILSI Europe is funded by Monsanto, and in addition by the Croplife International group and their members, which are the glyphosate producers:

Monsanto, BASF, DuPont, Dow Europe (Dow Chemical) et al.

This info can be obtained via the official ILSI website:

<http://ilsi.eu/about-us/>

The British newspaper, The Guardian, revealed in May 2016 how the ILSI is influenced by the payments from the chemical industry:

<https://www.theguardian.com/environment/2016/may/17/unwho-panel-in-conflict-of-interest-row-over-glyphosates-cancer-risk>

Prof Dr. Pat Heslop-Harrison from the Leicester University, UK has also strong connections to the glyphosate producers, Monsanto and Syngenta, because these companies support Leicester students with free scholarships.

This info can be obtained via the Monsanto news site:

<http://www.monsanto.com/global/in/ourcommitments/pages/monsanto-beachell-borlaug-international-scholarship-program.aspx>

And Syngenta cooperates with the Leicester University in projects or provides their students with job opportunities. This info can be obtained via the official Leicester University website: <https://le.ac.uk/search?q=syngenta>

## 5. The FAO under the influence of the glyphosate producers

Also, the FAO that judged glyphosate as non-toxic to the human body received in fall 2015 a voluntary financial contribution of € 300, 000 by the European Seed Associations (ESA):

This info can be obtained via the official ESA website:

<https://www.euroseeds.eu/esa-hands-300000€-voluntary-financial-contribution-fao-it>

And the paying members of the ESA are glyphosate producers: Monsanto, Syngenta, Bayer, and BASF. This info can be obtained via the official ESA site:

[https://www.euroseeds.eu/esa\\_members/Individual-Members](https://www.euroseeds.eu/esa_members/Individual-Members)

## 6. Efsa experts paid by the glyphosate producers

Eight members of the Efsa expert group that judged glyphosate as non-toxic to the human body are under the influence of the glyphosate producers. In addition, 4 of the 18 experts never worked on endocrine disrupters as the German NGO Lobbycontrol revealed:

<https://www.lobbycontrol.de/2015/06/efsa-bfr-gefaehrden-unsere-gesundheit-zugunsten-der-industrie/>

Also, the PAN Europe Network came to a conclusion in its analysis that nearly all Efsa experts are industry-biased. This info can be obtained via the PAN Europe report: A Toxic Mixture? Industry bias found in EFSA working group on risk assessment for toxic chemicals:

<http://www.pan-europe.info/old/Resources/Reports/PANE%20-%202011%20-%20A%20Toxic%20Mixture%20-%20Industry%20bias%20found%20in%20EFSA%20working%20group%20on%20risk%20assessment%20for%20toxic%20chemicals..pdf>

The Efsa staff is also under the influence of the chemical industry:

Jan Mousing, for example, worked for the private Danish Knowledge Centre of Agriculture SEGES P/S:

<https://www.linkedin.com/company/seges>.

And the Danish SEGES P/S works in close cooperation with the chemical industry, like glyphosate producer, Syngenta.

This info can be obtained via this Danish website (Only available in Danish): <http://www.danskgartneri.dk/nyheder/2015/september/handlingsplan-for-prosulfocarb-i-2015>

Jan Mousing's vita before he joined the Efsa team as a board member can be read on his LinkedIn page:

<https://de.linkedin.com/in/janmousing?trk=pub-pbmap>

Jan Mousing was also a member of the board of the food and agriculture lobby organization European Technology Platform, ETA "Food for Life", which is a division of the EU food industry lobby group, FoodDrinkEurope.

This info can be found via the website of The Parliament Magazine:

<https://www.theparliamentmagazine.eu/articles/news/no-place-food-lobby-efsa-board-says-ngo>

## 7. Monsanto hides his secret glyphosate studies with the help of the authorities

As mentioned before, the German BfR reviewed only glyphosate studies by the glyphosate producers which are not publicly available and are labeled as confident and trade secret. This is strange because the patents for Monsanto's glyphosate are expired in most of the countries.

This is also strange because the European Court has judged in 2013, in the law case, Greenpeace against Monsanto (Case T-545/11), that Monsanto has to make his glyphosate studies public because the health of over 600 million people in the European Union depend on the trade secret of the company.

This judgment can be obtained via the official European InfoCuria website:

<http://curia.europa.eu/juris/document/document.jsf?jsessionid=9ea7d0f130d589f04532581f4b588a7cc2074f2fd759.e34KaxiLc3eQc40LaxqMbN4Pa3aPe0?text=&docid=142701&pageIndex=0&doclang=EN&mode=lst&dir=&occ=first&part=1&cid=244708>

Despite this European Court judgement, the EU food safety institutes, BfR and Efsa, are not forcing Monsanto to publish their glyphosate studies.

Not only this, the BfR defends Monsanto strategy to hide the glyphosate studies by saying that Monsanto is authorized to do so.

And there are more reasons why the BfR is influenced by the glyphosate industry.

## 8. The German BfR and its experts under the influence of the glyphosate producers

Many of the BfR commissioners for pesticides get also paid directly by the glyphosate producers or are closely connected to them.

This info can be obtained via the official BfR website:

<http://www.bfr.bund.de/de/>



honeybees:

This info can be obtained via the NGO website Corporate Europe Observatory:

<http://corporateeurope.org/agribusiness/2013/04/pesticides-against-pollinators>

The managing director and Business Unit Head for Ecotoxicology of Eurofins is Dr. Marco Candolfi. And Marco Candolfi worked for Syngenta and BASF before he joined Eurofins Dr. Specht Laboratorien GmbH. This info is available via the official website of Eurofins: <http://www.eurofins.com/agroscience-services/about-us/latest-news/new-md-bu-head-for-ecotoxicology-eas-germany/>

In summary, 7 of the 13 BfR experts get paid or are influenced by the glyphosate producers. Another BfR expert works not directly for the chemical industry, but his institution has been criticized for its chemical industry friendly decisions.

Dr. Albert Bergmann, in particular, works for the Austrian Institute, AGES, which has been criticized by NGOs for their industry-friendly decision about the neonicotinoids. In this particular case, AGES received over €100, 000 from BAYER, Syngenta and BASF for creating a study that proves that the neonicotinoids are non-toxic to honeybees. This info is only available in German via the independent media website NEOPresse: <http://www.neopresse.com/umwelt/bienensterben-syngenta-zahlt-unbedenklichkeits-studien-selbst/>

And even the Austrian chamber of agriculture, the Landwirtschaftskammer Österreich (LKÖ), offered the apiarists (hush-) money when they are not talking in public about the mass death of their honeybees, as the Austrian media revealed. This article is only available in German via the official ORF website:

<http://www.orf.at/stories/2182223/2181992/>

It is also an academic flawed, that Dr. Jürg Zarn works for the BfR and for the FAO/WHO expert group that reviewed the work of the BfR. This means that the Swiss scientist, Zarn, was authorized to review, as a member of the FAO, his own glyphosate review which he did in the BfR.

And Dr. Jürg Zarn, who already worked together with Alan Boobis, works also for the industry-friendly Swiss organization, Bundesamt für Landwirtschaft (BLW), which got criticized many times by NGOs for their studies and decisions in favor of the chemical industry.

This info (only available in German) can be obtained via the independent and investigate

Swiss journalists platform Investigativ: <http://www.investigativ.ch/aktuell/detail/bundesamt-fuer-landwirtschaft-gegen-unbequeme-journalistin.html>

## 9. FAO experts are paid by the glyphosate producers

Furthermore, the individual FAO experts who reviewed the glyphosate studies and/or the BfR glyphosate review, are also under the influence of the glyphosate producers:

[http://www.who.int/foodsafety/areas\\_work/chemical-risks/JMPR\\_2016\\_ListOfExperts.pdf](http://www.who.int/foodsafety/areas_work/chemical-risks/JMPR_2016_ListOfExperts.pdf)

In particular, the following experts get paid by the glyphosate producers:

Alan Boobis, see details via Environmental Health News:

<http://www.environmentalhealthnews.org/ehs/news/2016/june/endocrine-disrupters-final-maneuvers-by-brussels2019-industry-linked-scientific-community>

Marloes Busschers worked for TNO Quality for Life for 6 years. The company connects people and knowledge to create innovations that boost the sustainable competitive strength of industry, and strongly cooperates in projects with the glyphosate producers: Monsanto, Syngenta and Bayer. These projects are probably also paid by these companies.

These infos can be obtained via the official TNO website:

<https://www.tno.nl/en/focus-area/healthy-living/food-nutrition/food-innovations/high-scale-and-high-level-protein-purification/>

Carl Cerniglia works for the U.S. Food and Drug Administration (FDA), which is very closely linked to Monsanto as many international publications unveiled.

This info can be obtained via this list of Monsanto Employees in Government, by Mathias Olsen via Metabunk: <https://www.metabunk.org/partially-debunked-list-of-monsanto-employees-in-government.t3664/>

And via Global Research Canada: <http://www.globalresearch.ca/monsanto-controls-both-the-white-house-and-the-us-congress/5336422>

Sylvaine Cordier works for the INSERM which has also been accused of lobbying for the industry. This info can be obtained via the official website of the French NGO Lobbycratie: <http://www.lobbycratie.fr/2010/03/16/alimentation-le-lobby-du-sel-n'en-manque-pas/>

David Eastwood works for the University of California, a public institution, which helps Monsanto, a billion-dollar private company, to fight a lawsuit against farmers.

This info can be found via the website Synbio Watch by Jeff Conant:

<http://www.synbiowatch.org/2013/02/uc-berkeley-joins-monsanto-in-fight-against-farmer/>

Monsanto also paid the University of California 100 million dollar for their patent for Posilac. And in addition, every year a minimum of \$5 million annual royalty will be paid until the year 2023:

<http://news.monsanto.com/press-release/monsanto-company-university-california-resolve-dispute-over-technology-used-produce-bo>

Andrea Hartwig works not only for the FAO but also for the German MAK Commission, where Andrea Hartwig has been accused, in an open letter by the German party, Bündnis 90 / Die Grünen, for not publishing her interest of conflicts while making decisions in favor of the industry. These infos are available only in German via the official website of the German party Die Grünen: [https://www.gruene-bundestag.de/fileadmin/media/gruenebundestag\\_de/themen\\_az/agrar/PDF/160512-brief-glyphosat-ueberpruefung-beteiligung-von-dr-Andrea-hartwig.pdf](https://www.gruene-bundestag.de/fileadmin/media/gruenebundestag_de/themen_az/agrar/PDF/160512-brief-glyphosat-ueberpruefung-beteiligung-von-dr-Andrea-hartwig.pdf)

Miriam Jacobs also works for Public Health England (PHE), an administration that has been criticized several times for their industry-friendly decisions.

This info can be found in the British newspaper, The Guardian:

<https://www.theguardian.com/society/2015/sep/15/experts-criticise-public-health-england-e-cigarettes-review>

And via the British newspaper, The Independent:

<http://www.independent.co.uk/voices/editorials/by-failing-to-release-a-report-on-reducing-sugar-consumption-tories-hamstrung-their-own-obesity-a6700541.html>

And here, via an open letter to the CMO (England):

<http://www.moraybeedinosaurs.co.uk/neonicotinoid/mason/>

[Open\\_letter\\_to\\_the\\_CMO\(England\)\\_the\\_Wellcome\\_Trust\\_and\\_Public\\_Health\\_England.pdf](http://www.moraybeedinosaurs.co.uk/neonicotinoid/mason/Open_letter_to_the_CMO(England)_the_Wellcome_Trust_and_Public_Health_England.pdf)

The Head of Business Development at the Public Health England (PHE) is David Rhodes, who also worked for the glyphosate producer Syngenta, before he joined the British administration. This info can be obtained via the official UK government website Public Health Matters:

<https://publichealthmatters.blog.gov.uk/author/david-rhodes/>

Public Health England (PHE) is the administration that formed the Centre for Environment and Health (MRC-PHE) in 2009 where Alan Boobis is the senior investigator who has been accused several times for lobbying for the chemical industry. This info is available via the NGO website of the activist lawyers ClientEarth: <http://www.clientearth.org/industry-influence-throws-doubt-pesticide-safety-claim-ahead-eu-vote/>

Virissa Lenters studied and researched at the Utrecht University, while Monsanto and other plant breeding companies fund projects of the Future Food Utrecht at the Utrecht University. This info can be found via the official website of the Utrecht University: <http://www.uu.nl/en/research/future-food-utrecht/results>

Also Syngenta cooperates closely with the Utrecht University and provides job opportunities for their students:

<http://www.uu.nl/masters/en/environmental-biology/career-prospects>

Dugald MacLachlan works for the FAO and JMPR, and attends workshops by the glyphosate producer, BASF. Dugald MacLachlan worked also in the OECD - RCEG Calculator Working Group together with scientists from the glyphosate producers - Syngenta, BAYER and DuPont.

[http://www.nacrw.org/2011/11Presentations/O-17\\_JaneStewart.pdf](http://www.nacrw.org/2011/11Presentations/O-17_JaneStewart.pdf)

In addition, Dugald MacLachlan is the Director of the Department of Agriculture and Water Resources in Australia, which functions like a marketing platform for the glyphosate producer, Syngenta. This info can be found on the official website of the Australian department: [http://www.agriculture.gov.au/ag-farm-food/food/publications/national\\_food\\_plan/issues-paper/submissions-received/syngenta?wasRedirectedByModule=true](http://www.agriculture.gov.au/ag-farm-food/food/publications/national_food_plan/issues-paper/submissions-received/syngenta?wasRedirectedByModule=true)

Angel Moretto had to resign from the panel of the European Food Safety Authority's Plant Protection Products and their Residues (PPR) after not declaring his interest of conflicts because he worked as an adviser to the consultancy company, Melete Srl. Melete. This info can be found via the website of the NGO Earth Open Source, by Claire Robinson: [http://earthopensource.org/wp-content/uploads/Eu\\_pesticidefoodsafety.pdf](http://earthopensource.org/wp-content/uploads/Eu_pesticidefoodsafety.pdf)

Furthermore, Angel Moretto is also a board member of the International Life Science Institute (ILSI) which is funded by its members: the glyphosate producers: Syngenta, Bayer, BASF and Monsanto. This info can be obtained via the British newspaper, The Guardian: <https://www.theguardian.com/environment/2016/may/17/unwho-panel-in-conflict-of-interest-row-over-glyphosates-cancer-risk>

Matthew O'Mullane worked also for the Australian Pesticides and Veterinary Medicines Authority (APVMA). The APVMA administration has been sued for helping the glyphosate producer, BAYER, with an anti-competitive policy position and by limiting market access for generic chemical products. This info can be found via the online magazine Farm Weekly:

<http://www.farmweekly.com.au/news/agriculture/general/news/court-ruling-on-apvma-backs-farmers/2752888.aspx?storypage=0>

The APVMA worked also closely together with an Australian farm lobby group, The Crop Life Australia. These infos are available via the official website of the ABC Australia media network:

<http://www.abc.net.au/news/2016-06-10/opposition-to-apvma-relocation/7498820>

The members of The Crop Life Australia are the glyphosate producers: Monsanto, Syngenta, BAYER, BASF, and DuPont. These infos are available via the official website of Crop Life Australia:

<http://www.croplife.org.au/members/>

Aldert Piersam is also an advisor to projects of ILSI's Health and Environmental Sciences Institute which is funded by its members: the glyphosate producers Syngenta, Bayer, BASF and Monsanto.

These infos can be obtained via the website of the NGO GM Watch: <http://www.gmwatch.org/news/latest-news/16939-conflict-of-interest-concerns-cloud-meeting-as-experts-review-glyphosate-risks>

Prakashchandra Shah worked as a Senior Industrial Toxicologist at Hoffmann-La Roche Inc. And Hoffmann-La Roche Inc. works in a joint venture with the Glyphosate producer, BAYER. Info via Wikipedia Germany:

[https://de.wikipedia.org/wiki/Hoffmann-La\\_Roche#cite\\_note-14](https://de.wikipedia.org/wiki/Hoffmann-La_Roche#cite_note-14)

Hoffmann-La Roche also cooperates with glyphosate producer, Syngenta in the ProRhenon AG in Basel.

This info can be found via the official website of ProRhenon: <http://www.prorhenon.ch/Organisation-Traegerschaft-19>

Hoffmann-La Roche works also together with the glyphosate producers - Syngenta, Bayer, BASF, and Dow Europe in the Swiss lobby organization, InterNUTRITION.

These infos can be obtained via the official website of Science Industries Swiss:

<https://en.scienceindustries.ch/involvement/internutrition>

<https://en.scienceindustries.ch/association/our-members>

Rachel Smith is in the Researchers' Society Committee at the MRC-PHE Centre for Environment & Health in England where Dr. Alan Boobis is the Senior Investigator. This info can be obtained via the official website of the MRC-PHE, Environmental Health UK:

<http://www.environment-health.ac.uk/researchers-society-committee>

See the industry biased details about the PHE and Alan Boobis above.

Raymond Tice worked between 2009-2015 for the US Tox21 consortium which cooperates with the EPA and FDA. This info can be obtained via the official website of the U.S. FDA:

<http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm219482.htm>

The U.S. Food and Drug Administration (FDA) has been in the critics for lobbying for the chemical industry and in particular for Monsanto. This info can be found via the website EcoWatch:

<http://ecowatch.com/2012/01/30/action-why-is-a-monsanto-lobbyist-serving-as-the-fdas-food-safety-czar/>

Also, the U.S. Environmental Protection Agency (EPA) has been accused for lobbying for the glyphosate producers - Monsanto and Dow Chemical in several cases.

This info can be obtained via The Huffington Post: [http://www.huffingtonpost.com/andrew-kimbrell/dow-chemical-and-monsanto\\_b\\_6041802.html](http://www.huffingtonpost.com/andrew-kimbrell/dow-chemical-and-monsanto_b_6041802.html)

Mireille Toledano is an affiliate member of the MRC-PHE Centre for Environment & Health where Dr. Alan Boobis is the Senior Investigator:

<http://www.environment-health.ac.uk/people>

See the industry biased details about the PHE and Boobis above.

Midori Yoshida works for the extremely chemical industry-friendly Food Safety Commission of Japan (FSCJ) which approved all GMO applications by Syngenta, Monsanto, Dow Chemical without any additional research. A few examples are the GMOs' maize MIR604 and GA21 by Syngenta and Monsanto.

This Info can be found via the official site of the Japanese administration: <https://www.fsc.go.jp/hyouka/hy/hy-summary-gmfood-mir604xga21.pdf>

Also, Dow Chemical's and Monsanto's cross-breeding cotton 281, cotton 3006, and roundup ready cotton1445 have been approved by the FSCJ without any further research: This Info can be found via the official site of the Japanese administration:

[https://www.fsc.go.jp/english/evaluationreports/newfoods\\_gm/fs1191\\_cotton281\\_1445.pdf](https://www.fsc.go.jp/english/evaluationreports/newfoods_gm/fs1191_cotton281_1445.pdf)

Also, the GMOs Bt Cry34/35Ab1 Event DAS-59122-7 and roundup ready maize NK603 by Du Pont and Monsanto have been approved by the FSCJ with the remark: "...does not require safety confirmation." cited via the official site of the Japanese administration:  
[https://www.fsc.go.jp/english/evaluationreports/newfoods\\_gm/fs1164\\_cry34\\_nk603.pdf](https://www.fsc.go.jp/english/evaluationreports/newfoods_gm/fs1164_cry34_nk603.pdf)

FSCJ also approved Monsanto's genetically modified maize varieties, which have been developed by crossing its high lysine maize line, LY038, with the maize line MON810, which is resistant to Lepidoptera pest. The FSCJ stated in its approval, without any further studies on the breed, that Monsanto's GMO breed maize has no adverse effects on human health.

This Info can be found via the official site of the Japanese administration:  
<https://www.fsc.go.jp/hyouka/hy/hy-summary-gmfood-ly038xmon810.pdf>

And while the FSCJ approved all products by Monsanto, Syngenta, DuPont and Dow Chemical without any additional studies,  
see here: <https://www.fsc.go.jp/hyouka/hy/hy-summary-gmfood-ly038xmon810.pdf> ,  
many international scientists proved in their studies how harmful these particular products are.

The GMOs MIR604 and GA21 for instance. This info is only available in German via the NGO website Testbiotech:  
[http://www.testbiotech.org/sites/default/files/TBT%20Comment\\_%20Bt11\\_MIR162\\_MIR604\\_GA21.pdf](http://www.testbiotech.org/sites/default/files/TBT%20Comment_%20Bt11_MIR162_MIR604_GA21.pdf)

or Monsanto's GMO maize Mon810. This info is available via the NGO website GMO Free USA:  
<http://www.gmofreeusa.org/?s=MON810&submit=Search>  
[http://www.gmofreeusa.org/gmo\\_article/feeding-study-with-bt-corn-mon810-ajeer-yg-on-rats-biochemical-analysis-and-liver-histopathology/](http://www.gmofreeusa.org/gmo_article/feeding-study-with-bt-corn-mon810-ajeer-yg-on-rats-biochemical-analysis-and-liver-histopathology/)

or with the GM maize variety LY038 x MON810.

This info is available via the NGO website GM Free Cymru:  
[http://www.gmfreecymru.org/news/Press\\_Notice9Nov2009.htm](http://www.gmfreecymru.org/news/Press_Notice9Nov2009.htm)

ZARN Jürg, see his conflicts of interest above.

10. Monsanto's past and actual lawsuits for hiding the toxic effects of their products

All these facts, scientifically and political, are just a few of the reasons why six European NGOs started a lawsuit against Monsanto, the BfR and the Efsa.

This info can be obtained the PAN Europe network website:

[http://www.pan-europe.info/press-releases/2016/03/2-march-2016-glyphosate-re-  
authorisation-ngos-join-forces-demand-legal-action](http://www.pan-europe.info/press-releases/2016/03/2-march-2016-glyphosate-re-<br/>authorisation-ngos-join-forces-demand-legal-action)

And it is not the first time that Monsanto has been caught and sued for hiding health issues in their product studies:

In 2015, Dr. Anthony Samsel was finally able to obtain some of Monsanto's secret Monsanto glyphosate studies from 1970-1980s, which have been denied to other inquirers, via a "Freedom of Information Act" request to his senator. These secret Monsanto studies reveal glyphosate's link to cancer and the fact that Monsanto has manipulated these studies by mixing data to hide these effects.

This info can be found via the website of the NGO GM Watch

[http://www.gmwatch.org/news/latest-news/16515-monsanto-s-secret-studies-reveal-  
glyphosate-link-to-cancer](http://www.gmwatch.org/news/latest-news/16515-monsanto-s-secret-studies-reveal-<br/>glyphosate-link-to-cancer)

and via the website of the lawyer agency Levin Papantonio:

<https://www.levinlaw.com/monsanto-roundup-litigation>

Monsanto has been successfully sued for making a false claim that Roundup targets enzymes supposedly found only in plants, not in people.

This info can be obtained via the Monsanto Class Action website:

<https://www.monsantoclassaction.org>

Monsanto has been sued for hiding the danger in their studies for the polychlorinated biphenyls (PCB) they have produced between 1930 and 1980.

This info is available via EcoWatch:

<http://ecowatch.com/2016/05/26/monsanto-losses-pcb-lawsuit/>

It was in 1975 that a Monsanto study found that PCBs caused tumors in rats. Monsanto simply "...ordered its conclusion changed from "slightly tumorigenic" to "does not appear to be carcinogenic."

The full article: "Monsanto Hid Decades Of Pollution" by Washington Post reporter, Michael Grunwald, can be found here, via Common Dreams:

<http://www.commondreams.org/headlines02/0101-02.htm>

Monsanto has also been caught hiding the danger of their cow hormone product, Posiliac, in their studies. This info is available via the website Organic Consumers:  
[https://www.organicconsumers.org/old\\_articles/rBGH/milkismilk20405.php](https://www.organicconsumers.org/old_articles/rBGH/milkismilk20405.php)

Monsanto is also promoting RoundUp with false scientific claims from studies they have outsourced to private scientists, which they have paid:

In 1996, Monsanto was sued for claiming that RoundUp's glyphosate is "biodegradable": This info can be found via The Huffington Post:  
<http://big.assets.huffingtonpost.com/fraud.pdf>

Monsanto has also been successfully sued for claiming that "Glyphosate is less toxic to rats than table salt acute oral ingestion"! The scientist and president of the German BfR, Andreas Hensel, repeated Monsanto's false marketing claim 20 years later in Germany, in 2016, by saying that glyphosate and salt have the same toxicology. Andreas Hensel said in an interview with the German news magazine Der Spiegel, "Die Tödliche Dosis von Glyphosat liegt in der gleichen Dimension wie Kochsalz."

This quote can be found online via the German news magazine Der Spiegel:  
<http://www.spiegel.de/spiegel/vorab/behordenchef-wirft-umweltverbaenden-und-gruenen-panikmache-vor-a-1081815.html>

## 11. Monsanto's vague claims about glyphosate

Monsanto makes false claims on its German glyphosate info site. Monsanto writes that glyphosate has an average half-value time in the ground / soil of 16.5 days. In contrast, independent studies with real field tests found that the average half-life time of glyphosate in the ground / soil is 47 days.

This info is available via the the website of the National Pesticide Information Center:

<http://npic.orst.edu/factsheets/archive/glyphotech.html#references>

Monsanto also claims on their European glyphosate product info site that glyphosate rarely can't be found in groundwater: "For the same reason, glyphosate residues are not likely to leach into groundwater and only limited amounts of glyphosate are found in surface water as a result of runoff."

The fact is that Horth found in 23% of the ground water samples glyphosate residues, and in 43% of the water samples AMPA residues, in his glyphosate water monitoring study

between 1997 - 2011 (Only available in German), and according to this presentation by Steffen Matezki, German Umweltbundesamt (UBA) via Agrarkoordination. This info is only available in German via the website Agrar Koordination: [http://www.agrarkoordination.de/fileadmin/dateiupload/Roundup\\_\\_\\_Co/2014-12-02\\_PAN-Vortrag\\_Matezki\\_Kurzversion.pdf](http://www.agrarkoordination.de/fileadmin/dateiupload/Roundup___Co/2014-12-02_PAN-Vortrag_Matezki_Kurzversion.pdf)

Monsanto also claims on their German glyphosate product info site that less than 1% of glyphosate residues can be found in surface water. This info is based on a 36-year-old study by W.M Edwards in 1980. Actual studies by Chang (et al., 2011), Battaglin (et al., 2011) and Daouk (et al., 2013) found glyphosate residues in 50% of the creeks and in 20% of the seas in Mississippi and Iowa in 2007 and 2008 respectively. The German testbiotech organization published a summary on glyphosate residues in waters, which is only available in German via: [https://www.testbiotech.org/sites/default/files/Basistext\\_Glyphosat\\_Testbiotech\\_\\_0.pdf](https://www.testbiotech.org/sites/default/files/Basistext_Glyphosat_Testbiotech__0.pdf)

Monanto claims on their European glyphosate info site that glyphosate has no effect on plant roots.

The German plant scientist, Prof Dr. Günter Neumann proved in various studies that glyphosate do have negative effects on non-targeted plant roots. These infos are only available in German via:

The BR TV news <http://www.br.de/mediathek/video/sendungen/unser-land/glyphosat-forschung-hohenheim-100.html>

via the website for sustainable agriculture: <http://stopogm.net/files/RGTNTPVR.PDF>

via the website for sustainable agriculture: <http://stopogm.net/sites/stopogm.net/files/GlyphosateBott.pdf>

German University Hohenheim: [https://opus.uni-hohenheim.de/volltexte/2011/606/pdf/Dissertation\\_S.\\_Bott\\_UH2010.pdf](https://opus.uni-hohenheim.de/volltexte/2011/606/pdf/Dissertation_S._Bott_UH2010.pdf)

12. The different maximum values of glyphosate in food are not scientifically verified

It's also not scientific comprehensible why the highest level of glyphosate residues in honey is 0.05mg/kg, in drinking water 1mg/kg, in corn 3mg/kg, in lentils 10mg/kg, in soy 20mg/kg and in mushrooms 50mg/kg.

See details via the EU Pesticides database for Plants:

<http://ec.europa.eu/food/plant/pesticides/eu-pesticides-database/public/?event=pesticide.residue.CurrentMRL&language=EN>

Are there any actual long term studies on humans that prove that these maximum values have no effects on the human body, on pregnant women, on babies, on elderly and ill people?

It's also strange that the Efsa / BfR increased in 2012 the amount of glyphosate in lentils by the factor 100, from 0.1 mg/kg to 10 mg/kg, without any studies or evidence of long term effects on the human body. See also this petition to the EU Parliament:

[http://www.europarl.europa.eu/meetdocs/2009\\_2014/documents/peti/cm/1022/1022470/1022470de.pdf](http://www.europarl.europa.eu/meetdocs/2009_2014/documents/peti/cm/1022/1022470/1022470de.pdf)

This is also dangerous because there is no glyphosate in food monitoring in Germany: The German food and health authorities are testing 5 million food samples for dozens of different pesticide residues every year, but only 1,200 food samples for glyphosate.

The numbers are taken from this German ZDF TV report:

<http://www.zdf.de/wiso/glyphosat-im-honig-44206590.html>

### 13. Glyphosate residues found in over 75% of the population

In a glyphosate urine test from 2015/16, with more than 2000 citizens who took part in this survey, 99.6 percent had levels of glyphosate residues which are five to 42 times over the maximum value of glyphosate residues for drinking water in Europe.

This info can be found via EcoWatch: <http://ecowatch.com/2016/05/12/mep-glyphosate-urine-test/>

In 2013, in an European-wide glyphosate test of 82 urine samples received from 18 countries, scientists found glyphosate residues in 44% of the samples.

This info is only available in German via the German NGO Der Bund: <https://www.bund.net/fileadmin/bundnet/pdfs/gentechnik/>

[130612\\_gentechnik\\_bund\\_glyphosat\\_urin\\_analyse.pdf](https://www.bund.net/fileadmin/bundnet/pdfs/gentechnik/130612_gentechnik_bund_glyphosat_urin_analyse.pdf)

And there is no long term study on how these glyphosate residues affect the human body.

### 14. Some supposable glyphosate effects on wild animals

Also the effects of glyphosate on red deers, fawns, pheasant and rabbits seem to be deadly as the Fallwild Bericht 2013/2014 by the German Landesamt für Natur, Umwelt und

Verbraucherschutz NRW, Forschungsstelle für Jagdkunde und Wildschadenverhütung revealed. This info is available only in German via the huntsman magazine Rheinisch-Westfälischer Jäger:

[http://www.rwj-online.de/rwj/forschungsstelle/wildkrankheiten/warum-rehe-krank-werden---und-wie-man-ihnen-helfen-kann\\_6\\_1284.html](http://www.rwj-online.de/rwj/forschungsstelle/wildkrankheiten/warum-rehe-krank-werden---und-wie-man-ihnen-helfen-kann_6_1284.html)

The dangerous effects of glyphosate on honey bees is also scientifically verified and beekeepers demand the EU administrations to ban glyphosate:

This info is available only in German via the NGO website for honey bees Mellifera e.V.:

<https://www.mellifera.de/ueber-uns/presse/mitteilungen/glyphosat-beeintraechtigt-das-orientierungsverhalten-der-bienen.html>

Details via M Boily et al „Acetylcholinesterase in honey bees (*Apis mellifera*) exposed to neonicotinoids, atrazine and glyphosate: laboratory and field experiments.“ <http://www.ncbi.nlm.nih.gov/pubmed/23443944>

Info available only in German via the website of the law agency Gaßner, Groth, Siederer & Coll.: <http://www.ggsc.de/aktuelles/aktuelle-meldungen/details/news/1015-glyphosat-in-honig-ggsc-fordert-von-der-eu-kommission-und-von-anderen-behoerden-schutzmassnah/>

#### 15. The effects of glyphosate on the biodiversity

The effects of glyphosate on biodiversity are also not considered by the final judgement of the EU administrations, BfR and Efsa. How glyphosate effects biodiversity is proven in these different studies, compiled by Rosemary Mason, in: Glyphosate: Destructor of Human Health and Diversity. These infos can be obtained via GMO Evidence:

<http://www.gmo-evidence.com/wp-content/uploads/2013/09/Glyphosate-Destructor-of-Human-Health-and-Biodiversity.pdf>

And on, Flavia Geiger et al. in “Persistent negative effects of pesticides on biodiversity and biological control potential on European farmland:” This study can be obtained via Science Direct:

<http://www.sciencedirect.com/science/article/pii/S1439179109001388>

16. The short and long term effects of the nearly 100 different herbicides formulas with glyphosate are not fully researched

This is important because the short and long term effects of the nearly 100 different herbicides formulas with glyphosate - and in particular in combination with dozens of different RoundUp additives, like the polyethoxylated tallow amine (POEA), propylenglycol, sodium sulfite, sodium benzoate, methyl p- hydroxybenzoate, 3-iodo-2-propynyl butyl carbamate, 5-chloro-2-methyl 3(2H)-isothiazolone and many others – on animals and the ecosystem are in the studies of the WHO, Efsa and BfR not evaluated and not considered for their decision of renewing the glyphosate admission.

## 17. Conclusion and claims

The European administrations, WHO, Efsa, FAO, BfR et al. and the scientists who claim that glyphosate is non-toxic to humans, animals and the ecosystem are heavily under the influence of the glyphosate producers.

Monsanto has been sued several times successfully for hiding product studies that prove that their products are harmful to humans, animals and the ecosystem.

Therefore, Monsanto and the other glyphosate producers, Syngenta, BAYER, BASF, Dow Chemical, DuPont et al. must disclose their secret studies of glyphosate and their studies for their herbicide products containing glyphosate.

The studies paid for and by the glyphosate producers have to be carefully re-evaluated by a group of independent researchers. The independent glyphosate studies must be re-evaluated in search for all proven effects on the human body, animals and the ecosystem by an independent authority, where GMO and glyphosate experts and critics from environmental NGOs work together.

Because, and according to the EU precautionary principle, over 700 million people in the EU shouldn't be the testimonials, and the 4.325.000 km<sup>2</sup> ecosystem shouldn't be the testing field for the chemical industry.