Open Letter to the European Chemicals Agency about Scientific Fraud and Ecocide

Geert Dancet
Executive Director
European Chemicals Agency

Dear Geert Dancet

When you were appointed in 2007 as ECHA's Executive Director you had previously served in the European Commission's industry directorate for more than 20 years. NGO's expressed their dismay; they had serious doubts about your independence from the Commission.
Let's hope you prove them wrong over the reassessment of glyphosate.
The German Government has accused the German Rapporteur Member State Federal Institute of Risk Assessment (BfR) and EFSA of scientific fraud for using Glyphosate Task Force (GTF) statistics but for some considerable time claimed them to be BfR's own work.
ECHA must ban glyphosate **NOW**. Human health and the environment are being totally destroyed by it and the hundreds of other chemicals that have been registered illegally.
European regulators can no longer rely on industry assessments.

The current EU legislation was originally set up to protect the pesticides industry. Monsanto and other agrochemical corporations helped the EU to design the regulatory systems for their own products and chose which country should be appointed as Rapporteur Member State. Regulation 1107/2009, Article 63 specified that: "*All confidential data ...shall be deleted or redacted.*" Much of the industry data submitted to the German RMS was redacted. ECHA has used redactions in some submissions to their own consultation.
REACH (Registration, **E**valuation, **A**uthorisation and Restriction of **Ch**emical substances)
The Biocidal Product Regulation (BPR, Regulation (EU) 528/2012) concerns the placing on the market and use of biocidal products which are used to protect humans...from the action of the active substances contained in the biocidal product.
"*REACH is a regulation of the European Union, adopted to improve the protection of human health and the environment from the risks that can be posed by chemicals, while* ***enhancing the competitiveness of the EU chemicals industry****. It also promotes alternative methods for the hazard assessment of substances in order to reduce the number of tests on animals.*"
It came into force on 02/08/07.

Chemical Watch article endorses scientists who work for the pesticides industry
Philip Lightowlers wrote in Chemical Watch about the re-assessment of glyphosate.
https://chemicalwatch.com/50875/scientists-challenge-iarc-hazard-only-identification-of-carcinogens?pa=true#utm_campaign=50814&utm_medium=email&utm_source=alert
The initial wording is identical to that published in *prnewswire.com*, an industry organisation that provides a news service for journalists delivered straight into their letterbox.
Lightowlers says: "*Published last month as a commentary article in the peer-reviewed journal Regulatory Toxicology and Pharmacology, its ten authors maintain that hazard-only approaches inappropriately group together chemicals with very different toxicities and lead to reactionary public policies.*" **Did he examine the original paper himself?**

Classification schemes for carcinogenicity based on hazard-identification have become outmoded and serve neither science nor society
http://www.sciencedirect.com/science/article/pii/S0273230016303038

There were several authors with conflicts of interest

The lead author Professor Alan Boobis is Vice-President of the International Life Sciences Institute (ILSI) Europe, an organisation that had received money from both Monsanto and CropLife International. Angelo Moretti is a board member of ILSI's Health and Environmental Services Institute. Boobis and Moretti were Chair and co-Chair respectively of the Joint FAO/WHO Meeting on Pesticides Residues (JMPR) that made the decision that glyphosate was non-carcinogenic and non-genotoxic. *"In 2012, the ILSI group took a $500,000 (£344,234) donation from Monsanto and a $528,500 donation from the industry group Croplife International, which represents Monsanto, Dow, Syngenta and others, according to documents obtained by the US right to know campaign."*
https://www.theguardian.com/environment/2016/may/17/unwho-panel-in-conflict-of-interest-row-over-glyphosates-cancer-risk

US National Resources Defense Council wrote to the WHO/FAO/JMPR to protest
The letter sent on 16/06/2015 objected to the presence of the following people on the JMPR: Alan Boobis, Angelo Moretti, Vicki Dellarco ex-US EPA and Roland Solecki Head of the BfR. They cited conflicts of interest.
https://www.nrdc.org/sites/default/files/hea_15061501a.pdf
Other authors of the paper quoted in Chemical Watch included Fenner-Crisp (who had been author with Dellarco in a paper at an ILSI workshop in 2007) and Charles Wolf from Syngenta USA. The paper also quoted Cancer Research UK who's Chairman Michael Pragnell was founder of Syngenta and former Chairman of Croplife International.

Public Integrity criticized two journals for their ties with industry
"Regulatory Toxicology and Pharmacology is one of two scientific journals known for their industry ties have become go-to publications for researchers who minimize risks from chemicals." This was according to the organization Public Integrity.
https://www.publicintegrity.org/2016/02/18/19307/brokers-junk-science

The second is: *Critical Reviews in Toxicology.* In 2016 Volume 46 Monsanto commissioned five reviews published in a supplement to *Critical Reviews in Toxicology.* Monsanto also funded them. *"As stated in the declarations of interest at the foot of each paper, all are funded by Monsanto via the industry consultancy firm Intertek. Many of the authors have links to Monsanto, other chemical companies, and industry consultancy firms."* Critics describe the journal as a purveyor of junk science – *"misleading industry-backed articles that threaten public health by playing down the dangers of well-known toxic substances."*
www.gmwatch.org/news/latest-news/17253-surprise-monsanto-funded-papers-conclude-glyphosate-not-carcinogenic-or-genotoxic

It is not surprising therefore that Intertek contributed to the FIFRA US EPA SAP comments on the lack of carcinogenicity of glyphosate. That is what Monsanto paid the scientists for.
https://www.regulations.gov/document?D=EPA-HQ-OPP-2016-0385-0094

Is the European Chemicals Agency preparing itself to support EFSA, the European Commissioners and the Glyphosate Task Force (GTF) to re-license glyphosate in 2017 ?
Of the 293 responses to ECHA's consultation, an overwhelming majority supported the International Agency for Research into Cancer (IARC) position. They were mainly from France. France has already announced its intention to ban glyphosate. The comments were numbered.
Organisations included IARC (France) and the 94 scientists supporting IARC, the Consensus Statement: Concerns over use of glyphosate-based herbicides and risks associated with exposures by 14 scientists, scientists from UCL London, Pesticides Action Network (Germany/Europe), Danish Society for Nature Conservation, Testbiotech and RISK

Consultancy US. All the Organisations were named, apart from one. A Belgian Organisation, the name of which was redacted, had six comments, but these were spread though the responses. They all supported the GTF.

Individuals from France, Germany, Italy, Finland, Hungary, Romania, Ireland, Sweden, Bulgaria, UK, Slovenia, Portugal and the Czech Republic attested to the dangers of glyphosate and were concerned that the industry studies were flawed. Comments number 290 and 291, in common with mine (number 119) quoted numerous studies of glyphosate's damaging effects on ecosystems. Submission number 128 from an individual in Germany cites many independent studies of the toxicity of glyphosate and gave extensive evidence of lobbying by the agrochemical industry and documented corruption, receipt of money and conflicts of interest in the FAO/WHO/JMPR/RMS/EFSA/GTF/ILSI. Why did ECHA redact some of these comments?

The German Government summoned Prof Dr Andreas Hensel before the Committee on Agriculture and Food and accused BfR of scientific fraud for using GTF statistics
The report says that BfR stands *"accused of endangering the population"* and also of *"intentional falsification of the content of scientific studies"*.
http://www.gmwatch.org/news/latest-news/17307-german-toxicologist-accuses-eu-authorities-of-scientific-fraud-over-glyphosate-link-with-cancer

"The statistical dodge employed by the German authorities to defend glyphosate was the subject of an explosive in-depth news report that aired on German TV last October (2015) *in the midst of deliberations by EU authorities on whether to re-authorize the chemical.*
The news report was broadcast by MDR, which is part of ARD, the main public national TV network in Germany. The report says that BfR stands "accused of endangering the population" and shows BfR director Prof Andreas Hensel facing questions from experts before the German Parliamentary committee for food and agriculture.
One of the experts, Prof Dr Eberhard Greiser, a retired epidemiologist at the University of Bremen, says of BfR's actions, "I'd say this is an intentional falsification of the content of scientific studies."
The MDR film notes that BfR, in its initial report to the EU authorities, claimed that there were no signs of cancer in the animal studies: "They took the position that even though one of the five studies on mice did show a significant increase in malignant lymphoma, they dismissed it as irrelevant, because, the BfR asserted, the other four studies did not indicate any cancer risk..." But Dr Peter Clausing showed how they did it.

Dr Peter Clausing gave evidence at the International Monsanto Tribunal
"Ample evidence has been provided above showing that European Authorities twisted or ignored scientific facts and distorted the truth to enable the conclusion that glyphosate is not to be considered a carcinogen, thereby accepting and reinforcing the false conclusion proposed by the Monsanto-led GTF. The German Federal Institute for Risk Assessment (BfR) and the European Food Safety Authority (EFSA) committed scientific fraud."
In his evidence to the Tribunal, Clausing systematically demolished arguments that the EU authorities used to dismiss the significant findings of glyphosate-induced malignant lymphoma in mouse carcinogenicity studies.
http://www.pan-germany.org/download/Memo_Monsanto-Tribunal_Peter_Clausing_10_2016.pdf

The complete recordings from the International Monsanto Tribunal are now available. Below is the link to Dr Peter Clausing's presentation: his is the third one on page 8.
https://vimeo.com/channels/mten/page:8

The first presentation on page 8 is by Lawyer Maogato Jackson who talked about Monsanto's War Crimes andLawyer Koffi Dogbevi who discussed Ecocide (destruction of the environment) as a crime against humanity that is likely to be subject to prosecution in the International Criminal Court. T he Office of the Prosecutor proposed this on 14/09/2016.
https://www.theguardian.com/global/2016/sep/15/hague-court-widens-remit-to-include-environmental-destruction-cases
The second is Human Rights Lawyer William Bourdon speaking on the peoples Right to Information. In Britain, the M edia has deliberately deprived us of this right.

Dr Shiv Chopra, an expert from regulatory agency Canada: Pressure on stakeholders and institutions. He talked about the problems of being a whistle blower in Canada.
Claire Robinson PhD Editor of GM Watch: she explained how the industry-funded UK Science Media Centre and Monsanto led a vicious worldwide media campaign against Prof Séralini's 2-year study of rats fed Monsanto's GM Maize and Roundup.
On 16 October 2015, Prof Gilles-Eric Séralini was awarded Whistle blower of the Year(a shared award) by German Scientists for his work on GMOs and Glyphosate.
Citation: *"He was the first to publish animal test results demonstrating the toxic and carcinogenic properties of the most commonly used herbicide worldwide, the glyphosate-based "Roundup" by carrying out a two-year feeding test on rats. After the research was published, Prof Séralini was attacked by a vehement campaign by 'interested circles' from the chemical industry as well as the industry-financed British Science Media Centre."*

The US EPA, having concluded that glyphosate is not a carcinogen (presumably in common with ECHA), also invited public comments

Public comments were invited on 16/09/2016 to the Scientific Advisory Panel of FIFRA (Federal Insecticide, Fungicide and Rodenticide Act) on US EPA Glyphosate Issue Paper: Evaluation of Carcinogenic Potential. However, only 4 days before the meeting it was suddenly delayed. *'Given the importance of epidemiology in the review of glyphosate's carcinogenic potential, the Agency believes that additional expertise in epidemiology will benefit the panel and allow for a more robust review of the data."*
https://www.regulations.gov/document?D=EPA-HQ-OPP-2016-0385-0094

Why did US EPA delay the FIFRA SAP meeting at such short notice?
Carey Gillam suggests that EPA bowed to intense industry lobbying.
http://www.huffingtonpost.com/carey-gillam/epa-bows-to-chemical-indu_b_12563438.html

CropLife America (a US trade association representing the major manufacturers, formulators and distributors of crop protection and pest control products) had written to EPA to object to Dr Peter Infante, an epidemiologist, being included on the list of members of the SAP. They said that: *"Dr Infante is a member of the Collegium Ramazzini which has taken a radical anti-pesticide position such as calling for a prohibition on all 'pesticide use in public areas and recreation grounds' even if regulatory agencies have such uses were safe."*
http://191hmt1pr08amfq62276etw2.wpengine.netdna-cdn.com/wp-content/uploads/2016/01/CLA-Comments-on-SAP-Disqualification-10-12-16.pdf

CLA produced five pages of spurious allegations as to why Dr Infante would be biased against glyphosate. CLA also called into question the presence of Kenneth Portier, Christopher Portier's (IARC) brother on the committee.

Lawsuits against Roundup for causing Non-Hodgkin's Lymphoma have been put together
https://www.schmidtlaw.com/roundup-lawsuits-centralized-in-mdl-in-northern-california/

On October 4 2016 a Panel of Federal Judges created a Multi-District Litigation (MDL) to centralize dozens of Roundup Lawsuits in one court in California. The Schmidt Firm, PLLC, a national law firm says: *"All of the lawsuits accuse Monsanto of failing to warn consumers and regulators about the risks of NHL of exposure to Roundup, a popular weed killer that contains glyphosate."* Lawyers also say that: *"the combination of glyphosate with the surfactant POEA makes Roundup even more toxic that glyphosate alone.*

Why was the Collegium Ramazzini singled out for holding such a reasonable position, bearing in mind that the 'so-called' regulatory agencies are controlled by industry?
Monsanto's neurotoxic sweetener aspartame was licensed in 1982 by similarly fraudulent means. For the first 16 years aspartame was banned by the FDA because it was highly toxic to the nervous system. FDA Scientist Adrian Gross told Congress that without a shadow of a doubt, aspartame can cause brain tumors and brain cancer and that it violated the Delaney Amendment, which forbids putting anything in food that is known to cause cancer.

Aspartame was due to be re-licensed in 2013/2014 and Monsanto had chosen Britain to be its Rapporteur Member State for aspartame because it could trust it to be obliging.
The UK had obliged Monsanto since 1982. The Collegium Ramazzini wrote in 2013 to object to Monsanto's neurotoxic sweetener aspartame being re-licensed because it found evidence of long-term neurotoxicity.
Prof David Coggon was Chairman of the Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment (CoT) at the time of reassessment of aspartame (and Prof Alan Boobis the Vice Chairman of ILSI Europe is current Chairman).
A statement said: *"At its meeting on 29 October 2013, the Committee on Toxicity discussed a paper, describing results from a study led by scientists at Hull York Medical School"*...No-one is allowed to see this study until it has been accepted for publication in a peer-reviewed journal. *"The Committee judged the delay acceptable since the results presented did not indicate any need for action to protect the health of the public."* EFSA had also re-evaluated the safety of aspartame. As a result, it concluded in December 2013 that *'aspartame and its breakdown products are safe for human consumption at current levels of exposure'*.
Professor Erik Millstone, Professor of Science Policy at the University of Sussex sent a 67-page detailed response to the Head of EFSA 'Food Ingredients and Packaging' Unit and the Senior Scientific Officer.
https://www.sussex.ac.uk/webteam/gateway/file.php?name=millstone-on-efsa-on-aspartame-16dec2013.pdf&site=25
This was ignored by EFSA, just as the findings of the Ramazzini Foundation have been ignored in Europe and Dr Betty Martini and Dr John Olney have been ignored in the US.

In 1991 an archival document showed that the US EPA Health Effects Division colluded with Monsanto: glyphosate to be changed from a Group C carcinogen to Group E (evidence of non-carcinogenicity for humans)
http://www.epa.gov/opp00001/chem_search/cleared_reviews/csr_PC-103601_30-Oct-91_265.pdf

Members of US EPA's Toxicology Branch of the Hazard Evaluation Division Committee in a consensus review on March 4 1985, had classified glyphosate as a Group C carcinogen, based on the incidence in rats/mice of renal tumours, thyroid C-cell adenomas and carcinomas, pancreatic islet cell adenomas, hepatocellular adenomas and carcinomas in males, but on June 26 1991 the Health Effects Division Carcinogenicity Peer Review Committee met to discuss and evaluate the weight of evidence on glyphosate with particular emphasis to its carcinogenic potential. In a review of the data the Committee concluded that glyphosate should be classified as Group E (evidence of non-carcinogenicity for humans). However, three of the Committee refused to sign and wrote: DO NOT CONCUR.

Monsanto's sealed secret studies from the US EPA obtained under Freedom of Information
US Scientist Anthony Samsel analyzed Monsanto's sealed secret long-term studies (15,000-20,000 pages) from the US EPA (on mice, rats, rabbit and beagles) and showed that Monsanto knew that glyphosate was carcinogenic from the 1970s. Bioaccumulation of ^{14}C-radiolabelled glyphosate was also confirmed contrary to Monsanto's claim that glyphosate did not accumulate. Residues were present in most organs of the body. Professor Alan Boobis was the same chairman of the JMPR team that reassessed glyphosate in 2002 and Roland Solecki Head of the BfR was also a member. In 2002 JMPR also concluded that glyphosate was not carcinogenic or genotoxic.
But in 2015, a full 13 years later, the German Government said that this conclusion by BfR was 'intentional falsification of the content of scientific studies ' and BfR stands 'accused of endangering the population'. On 20/12/ 2013, Dan Goldstein, Senior Science Fellow and Lead, Medical Sciences and Outreach, Monsanto said that glyphosate was structurally related to the amino acid glycine and is excreted unchanged in the urine.
Goldstein referred to the European 2002 reassessment when he repeated their statement that glyphosate did not accumulate. Thanks to US Scientist Anthony Samsel's perseverance we now know that the first part was true and that glyphosate can substitute for glycine in the body, but the second part was a lie; it does cumulate.

Glyphosate causes cataracts and interstitial damage
Among Monsanto's long term studies an unpublished study on albino rats in 1990 showed that glyphosate entered the eye and caused cataracts and tissue damage. The rate of cataract surgery in England *"increased very substantially"* between 1989 and 2004 from 173 (1989) to 637 (2004) episodes per 100,000 population.
A 2016 study by the WHO also confirmed that the incidence of cataracts had greatly increased: 'A global assessment of the burden of disease from environmental risks.' says that cataracts are the leading cause of blindness worldwide. Globally, cataracts are responsible for 51% of blindness – an estimated 20 million individuals suffer from this degenerative eye disease.
http://apps.who.int/iris/bitstream/10665/204585/1/9789241565196_eng.pdf
In the US between 2000 and 2010 the number of cases of cataract rose by 20% from 20.5 million to 24.4 million. It is projected that by 2050, the number of people with cataracts will have doubled to 50 million.

In Swansea the indiscriminate use of Roundup and other pesticides on Japanese knotweed that grows on old industrial sites where the ground is disturbed has poisoned our reserve
Between 2010 when we wrote our two photo-journals (Speckled Bush Crickets and The Year of the Bumblebee) and 2016 we have had massive biodiversity losses in our small nature reserve. Bumblebees, butterflies, moths, bush crickets, spiders, dragonflies, ladybirds, solitary bees, hoverflies, bats, beetles, shield bugs and many other small creatures have all but disappeared. These photo-journals become historical documents.

If this is happening to these species, what is happening to our children and to us?
Glyphosate was found to be present in samples of water (river and tap water) taken in August 2013 and sent to a laboratory in Leipzig, Germany. The level of glyphosate in a Welsh river draining from areas of Japanese knotweed spraying was 190 parts per trillion (ppt) and in local tap water was 30 ppt. These were of the order of concentrations found in a laboratory study in 2013 that showed that breast cancer cell proliferation is accelerated by glyphosate in extremely low concentrations. Analysis in local tap water in August 2014 revealed a 10-fold increase since August 2013: from 30 ppt to 300 ppt. In 2015, a three-year Japanese knotweed eradication programme was planned in the valley adjacent to our

reserve 'while it was still legal' I was told. Under FOI in December 2015, we learned that 1440 kg Roundup had been sprayed. But Roundup is also used for private contractors working for estate agents. A house must be free of Japanese knotweed before it can be sold.

Wildlife Law: Control of Invasive Non-native Species and statutory powers
Law Commission Report: On 11 February 2014, The Law Commission published its final report, Wildlife Law: Control of Invasive Non-native Species. *"This is the first item to be delivered from the full project. This element of the project was brought forward at the request of Defra and the Welsh Government to enable them to consider whether to introduce early legislation."* If landowners do not comply, this new law will give the relevant body (Defra, the Welsh Government and statutory bodies such as the Environment Agency, Forestry Commission, Natural England and Natural Resources Wales) the power to enter land for the purposes of species control. Japanese knotweed is among the plant species specified, but the law is coy about stating the me thod to be used.

Swansea City and County Council revealed in November 2016 "a war on weeds"
An extract from the Swansea Leader November 2016: *"The Council has already treated 1,500 km of roadside around the city over the summer with weed-killer to keep unwanted plants at bay. And in the autumn the council treated them all over again in an effort to prevent them returning in the spring."* The applicators ignored the new rules by CRD (see next paragraph). The Council are presumably aware that Roundup is under scrutiny, so *"while it is still legal"* it is trying to kill as many weeds as possible before it is banned. One of our neighbours, found spraying his drive, had similar ideas about using up his tank spray in case it was banned.

Chemical Regulations Directorate NEW RULES 2012 for Roundup spraying
Streets and pavements: *"From 2012 new rules from the regulator, Chemical Regulations Directorate (CRD) prohibits blanket spraying of any herbicide on non-porous hard surfaces. Targeted treatment of weeds must be undertaken on roads, pavements, concrete and paved areas and drains must not be over-sprayed."*

The citizens of Swansea are sick; with cancers, neurological diseases and cataracts, just as Monsanto found in long-term studies before it gained illegal registration with the US EPA
There are cancer hotspots in the surrounding villages where Roundup is sprayed. Over the last few years friends and acquaintances have been treated for (or have died from) numerous diseases: brain tumours (mostly glioblastomas), cancers of the breast, ovary, prostate, lung (more than half of which were in non-smokers), oesophagus, colon, pancreas, rectum, kidney, melanoma, osteosarcoma, non-Hodgkin's lymphoma, uterine carcinoma, leiomyosarcoma of the uterus, multiple myeloma, Parkinson's, Multiple sclerosis, Motor - neurone Disease and Alzheimer's/Dementia. Many of the cancers are aggressive and unusual; they resemble the cancers that were seen in factory workers in the pesticides industry in the 1960s. Had I detailed the many cancers affecting people in our area at the beginning of my campaign, I would have been accused of being 'anecdotal.' But if we link these cancers to the total disappearance of wildlife from our nature reserve and the sudden diagnosis of cataracts/ macular degeneration amongst this group of people after intense application of Roundup to 3,000 km of city roads during the summer and autumn 2016, we have a perfect storm.

The UK State of Nature Report 2016; the environment in Britain is 'pretty knackered'
Mark Eaton of the RSPB, the Report's first author said: *"The report includes a new "biodiversity intactness index", which analyses the loss of species over centuries. The UK has lost significantly more nature over the long term than the global average with the UK the*

29th lowest out of 218 countries. "It is quite shocking where we stand compared to the rest of the world, even compared to other western European countries: France and Germany are quite a way above us in the rankings," said Eaton. *"The index gives an idea of where we have got to over the centuries, and we are pretty knackered."*

Food and Environment Research Agency (FERA) survey of pesticides 1988 to 2014
These indicate that Pesticide Residues on British food are increasing annually. A survey of pesticide (active substances) usage on Oil Seed Rape (OSR) 1988-2014 showed that the number of active substances applied had increased from 5 in 1988 to 15 in 2014 (Fig 1) and the number of treatments had increased from 5 in 1988 to 12 in 2014. (Fig 2) In 2014, herbicides were used on 98.4% OSR and seed treatments on 95.8%.
In 2014 glyphosate was used on Wheat (601,330 kg) Winter barley, Spring barley, Oats, Rye, Triticale, Oilseed rape (577,969 kg), Linseed, All potatoes, Peas, Beans, Sugar beet, with a total of 1,765,465 kg glyphosate on all crops. The total weight of pesticides (herbicides and desiccants, fungicides, growth regulators, molluscicides and repellants, insecticides and seed treatments) applied to farmland in 2014 was in excess of 16,000 tonnes.

Pesticide usage statistics show massive increase in glyphosate between 2012 and 2014
Fera statistics showed that in 2012 the area treated by glyphosate was 1,750,000 ha. This had increased in 2014 to 2,250,000 ha. Guy Gagen, Chief Arable Adviser for the NFU, said increased glyphosate use (up one third since 2012, to an area the size of Wales) was probably due to treatment of 'black grass.'
http://www.thetimes.co.uk/tto/environment/article4528297.ece
Black grass is a glyphosate-resistant super-weed just like Japanese knotweed. Herbicide resistant black grass, first seen in 1982 (two years after farmers started spraying glyphosate pre-harvest) and is now found on 16,000 farms in 34 counties. Gagen said that spraying wheat could result in traces of glyphosate ending up in bread sold in supermarkets but the amount was well below the maximum residue level set by the EU. A Defra spokesman said: *"There are extensive regulations in place so that people and the environment are protected from pesticides. The approval of glyphosate for use across Europe is being reviewed by the EU Commission."*

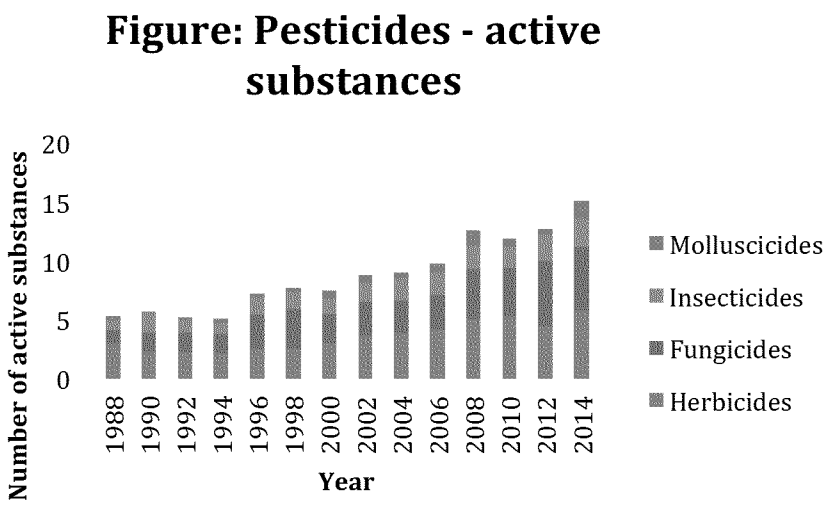

Fig. 1 PESTICIDES: Number of active substances used on Oil Seed Rape in the UK between 1988 and 2014: By kind permission of John Hoar, Hampshire Beekeeper's Spray Liaison Officer. Figures supplied by FERA

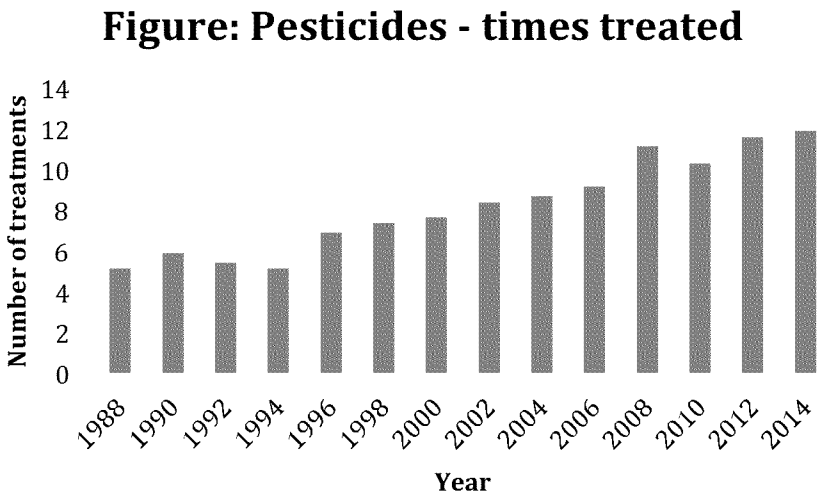

Fig. 2 PESTICIDES TIMES TREATED: used on Oil Seed Rape in the UK between 1988 and 2014: By kind permission of John Hoar, Hampshire Beekeepers Spray Liaison Officer. Figures supplied by FERA

Healthy Harvest-safeguarding the Crop Protection toolbox: June 2014
The National Farmers' Union (NFU), the Crop Protection Association (CPA) and Agricultural Industries Confederation (AIC) launched *Healthy Harvest – safeguarding the crop protection toolbox* in June 2014. https://www.nfuonline.com/healthyharvest_final_digital/
The NFU and pesticide companies continually defend the use of pesticides for economic reasons and complain at any attempt to restrict the 320 at their disposal. One farmer defended aerial spraying of bracken with herbicide. CPA, AIC and the NFU commissioned Andersons to write a Report: The effect of the loss of plant protection products (i.e. pesticides) on UK Agriculture and Horticulture that predicted dire economic effects on UK farming if pesticides were restricted.

Why are you all protecting the pesticides industry? Have you no insight? You and your families are likely to be affected by some of these diseases in the future
Monsanto has been lying to you for the sake of money. They wanted to control the food. "*Control the food and you control the people*". The CEO Hugh Grant and the US EPA knew that glyphosate caused all of these problems. The Corporation concealed the carcinogenic effects of PCBs on humans and animals for seven years. They have no plans to protect you and your families from the tsunami of sickness that is affecting us all in the UK and the US.

Humans and the environment are being poisoned by thousands of untested and unmonitored chemicals
The global élite may be able to survive by eating organic food, but not by 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 intentionally 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 or Syngenta Executives, Prime Ministers or Presidents. Many people in the UK are no longer reaching the biblical age of three-score-years-and ten because they are dying of cancers, neurological diseases such as Alzheimer's, Motor Neurone disease, multiple sclerosis, Parkinson's, obesity, diabetes, kidney failure, liver

failure, autism, birth defects, disabilities and suicide from increasing mental health problems.

Predictions for the future

- People born in 1960 will have a one in two chance of getting cancer during their lifetime.
- In 1970, the incidence of autism in the US was 1:10,000. In 2007 it was 1:150. I n 2009 it was 1:100. In 2013 it is 1:50 and by 2025 it will be 1:2, i.e. 50%.
- By 2050 the incidence of people with vision loss from cataracts and macular degeneration will be doubled.
- Obesity: by 2025 the UK will have the highest obesity rates among both men and women in Europe, at 38%: in contrast in France women have had virtually no increase in BMI over 40 years.
- Diabetes: WHO said worldwide in 1980 108 million people had diabetes; in 2014, this had risen to 422 million. This is predicted to rise steeply.

Human health depends on biodiversity

Dr Eric Chivian founded the Center for Health and the Global Environment at Harvard Medical School in 1996 *"To help people understand that our health, and that of our children, depends on the health of the environment and that we must do everything we can to protect it"*. He and Aaron Bernstein co-edited a book: *Sustaining Life. How Human Health Depends On Biodiversity* which included contributions from more than 100 leading biodiversity and health scientists and co-sponsored by the United Nations Development Programme, the United Nations Environment Programme, the Secretariat of the Convention on Biological Diversity and the World Conservation Union

I will send ECHA our photo -journals Speckled Bush Crickets and The Year of the Bumblebee. I sent the latter to Dr Bernhard Url at EFSA, but despite the fact that millions of people worldwide voted to ban it, the unelected European Commissioners still relicensed glyphosate for 18 months while ECHA 'considered the science'.

We also sent the books to the judges of the International Monsanto Tribunal. We thought they would help in their deliberations as to whether Ecocide (destruction of the environment) will become a crime against humanity for which individuals and countries can be prosecuted in the International Criminal Court in The Hague.

It is only by seeing photographs of the beaut y and diversity of creatures that we have lost as a result of pesticides will you appreciate why we are utterly devastated. They will never return. As the RSPB Report says: seventy-five per-cent of the land in Britain is farmed. It is hardly surprising that Britain's Biodiversity Impact Index is so low in the list of 218 countries.

Rosemary Mason

15/11/2016