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Dear MEP,

We are writing to you ahead of the expected European Parliament vote in plenary on the presentation of the Environment Committee's resolution on glyphosate.

It is the opinion of the UK Unions that the Environment Committee's resolution should not be supported. The Committee's resolution calls for the European Commission to withdraw its current proposal for re-approval and to conduct an independent review of the evidence surrounding glyphosate as a possible carcinogen. We believe this request ignores the best available science and should therefore not be supported on three main grounds.

Firstly, the legal process clearly established for the reauthorisation of active ingredients, agreed through the co-decision making process, places the responsibility of decision making firmly in the hands of Member States. Commission Regulation (EU) No 546/2011 states that 'Member States shall come to a reasoned decision within 12 months of receiving a technically complete dossier. A technically complete dossier is one that satisfies all the requirements of the Annex to Regulation (EU) No 545/2011...The judgements made by the competent authorities of the Member States during the evaluation and decision making process must be based on scientific principles, preferably recognised at international level (for example, by the EPPO), and be made with the benefit of expert advice'.

In its conclusions EFSA, the European agency funded by the EU that operates independently of the three European legislative and executive institutions and Member States, stated that 'glyphosate is unlikely to pose a carcinogenic hazard to humans'. This statement was supported by the Member State Rapporteur Germany in their subsequent report. Consequently, calls from the European Parliament for an independent analysis can only be viewed as both factually inaccurate and politically motivated.

Secondly, in the light of ongoing and emerging trade deals, any move to further restrict the availability of key plant protection products (PPPs) in Europe risks rendering UK and European agriculture less competitive in global markets. Such a scenario would likely see an increase in European import substitution. Given EFSA's positive opinion on the re-authorisation of glyphosate, the EU could not ban the import of products containing legally established Maximum Residue Levels (MRLs) of glyphosate – the most widely used herbicide in the world. Therefore, UK and European citizens could continue to consume products possibly containing glyphosate residues, making the resolution inconsistent and insubstantial.

Thirdly and most importantly, the resolution presented by the Environment Committee fails to take into account product stewardship and use on farm that delivers significant benefits environmentally and financially.

The Sustainable Use Directive (SUD) 2009/128/EC introduced new legislative provisions to achieve the sustainable use of pesticides by reducing the risks and impacts of pesticide use on human health and the environment. The transposition of the SUD has promoted the continued adoption of integrated pest management and mandatory training for distributors, advisors and professional users of pesticides. As such the use of glyphosate, as with all PPPs, remains tightly regulated in accordance with European regulation.

Glyphosate has long been used on farm as a broad-spectrum herbicide to control pernicious weeds before planting. This practice allows the farmer to avoid more expensive cultivation techniques such as ploughing. This is proven to be good for climate change mitigation by reducing fossil fuel usage in tractors and subsequent greenhouse gas emissions. Furthermore, these minimum tillage establishment practices have additional environmental benefits, and have been shown to have positive effects on bio-diversity and decrease soil erosion.

Moreover, a recent report by ADAS, the UK's largest independent agricultural consultancy, found that the removal of glyphosate from the marketplace would reduce UK production of winter wheat and winter barley by 12% and oilseed rape by 10% with a cumulative value of €633m per year. While it would likely be the arable sector that is hardest hit through any restrictions, the implications would be felt across the industry. Loss of availability in the livestock and dairy sectors would result in an inability to tackle invasive and poisonous species such as ragwort in grassland. The RSPB also cite glyphosate as a key product in controlling bracken and rushes, which when managed can provide good habitat for a variety of wildlife.

The UK Unions have long remained advocates of the use of sound scientific evidence in the regulation of agricultural technologies. EFSA are central to delivering this approach in European policy making. To ignore their advice on an issue as central to the UK and European agricultural sector as glyphosate would set a dangerous precedent and risks relegating the European agricultural sector to the second tier of global agriculture and agricultural technologies.

If European and UK farmers are to meet the challenge of sustainably producing more to feed a growing population and to build resilience to climate change, we must have all means to do so readily at our disposal – access to glyphosate is a vital part of this.

It is with this in mind that I ask you to reject the motion presented to the European Parliament.

Yours sincerely,



Meurig Raymond
National Farmers Union President



Stephen James
NFU Cymru President



Allan Bowie
National Farmers Union of Scotland President



Ian Marshall
Ulster Farmers Union President