



**Pesticide
Action
Network**
Europe

Manipulation of science

Brussels, 21-09-2017.

Contact : Hans Muilerman
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To: The Management Board of Food Authority EFSA.

Concerning: Manipulation of science in the glyphosate dossier.

Dear Board Members, we are contacting you regarding a serious case of manipulation of science. As you will be aware, Article 8.5 of Regulation 1107/2009 requires a review of the scientific peer-reviewed open literature to be added by the applicant to the dossier for approval of a pesticide.

An analysis of the Pesticide Action Network¹ already revealed that the provision in the law is turned into a dead letter, since in a random sample of 7 pesticide dossiers, less than 25% of the many thousands peer-reviewed studies were identified and even not a single one of the studies identified considered useful for pesticide risk assessment. All academic studies were dismissed. Much to blame are the Rapporteur member states that fail to enforce the mandate to find all literature and often don't even assess the validity of the review done by industry and just accepted the outcome. It is clear that the system is not functioning and the law undermined.

A very serious case of manipulation is the dismissal of a 2012 study by Prof GE Séralini and colleagues on glyphosate herbicide (Roundup formulation)² by industry (the Glyphosate Task Force) with the argument "Article retracted. Not considered reliable any more". **The study, however, is not retracted at all.** It was republished by another journal after the editor of the first journal retracted it in 2013 on the scientifically unprecedented grounds of its being "inconclusive" on just two endpoints, mortality and tumours, out of many analysed³. The Monsanto papers released this summer⁴, as well as documents obtained by the American NGO, US Right to Know, in Freedom of Information requests, have shown the dishonesty of the process. The editor-in-chief of the first journal, Wallace Hayes, was paid personally by Monsanto⁵. Richard Goodman, a former Monsanto scientist, joined the editorial board after the study's publication and oversaw

¹ PAN E report Missed and Dismissed. <http://www.pan-europe.info/old/Resources/Reports/PANE%20-%202014%20-%20Missed%20and%20dismissed.pdf>

² Seralini, Gilles-Eric; Clair, Emilie; Mesnage, Robin; Gress, Steeve; Defarge, Nicolas; Malatesta, Manuela; Hennequin, Didier; Vendomois, Joel Spiroux de, Republished study: long- term toxicity of a Roundup herbicide and a Roundup-tolerant genetically modified maize, Environmental Sciences Europe, (2014) Vol. 26, No. 1, pp. 1-17, 2014.

³ http://www.gmwatch.org/files/Letter_AWHayes_GES.pdf

⁴ <https://usrtk.org/pesticides/mdl-monsanto-glyphosate-cancer-case-key-documents-analysis/>

⁵ <http://baumhedlundlaw.com/pdf/monsanto-documents/10-Monsanto-Consulting-Agreement-with-Food-and-Chemical-Toxicology-Editor.pdf>

the start of the review process that ended in the retraction⁶. Goodman wrote in an email in 2012 that he received 50% of his salary from a project funded by Monsanto, Bayer, BASF, Dow, DuPont and Syngenta, which consists of establishing a database of food allergens⁷. The Monsanto Papers also show that Monsanto was active in the retraction campaign against the study from the start⁸, as was the Monsanto collaborator scientist Bruce Chassy⁹. In 2011 Chassy was funded by Monsanto, a fact that he did not disclose¹⁰. We conclude from these facts that the Glyphosate Task Force's characterization of the Séralini study as "not reliable" is itself not reliable, originating, as it does, from a campaign orchestrated by Monsanto.

The Séralini study is the longest chronic experiment with the full formulation of glyphosate –and we know that the co-formulants change its toxicity. Since data requirements for chronic toxicity of formulations are missing in the Regulation, the Séralini study fills an important knowledge gap as well as serving the obligation in the Regulation (Art.4.3.b) to take into account cumulative and synergistic effects. It is a bitter shame that the Rapporteur Germany accepted this manipulation by the Glyphosate Task Force.

The manipulation happens on a large scale. The UK newspaper The Guardian this week reported¹¹ on the dismissal of the epidemiology studies on glyphosate and its formulations for no good reason. Epidemiology studies are highly relevant studies since they report on the real-world situation with actual exposures. Rapporteur Germany (BfR) agreed with industry uncritically. The end result is that Food Authority EFSA is unable to include these studies in their crucial scientific opinion.

At the background of this unpleasant story is a massive industry campaign to push academic science into the corner. Industry studies, with a questionable sensitivity to human low dose exposures, are considered top-level science in this campaign while

⁶ Claire Robinson (2017). Uncovered: Monsanto campaign to get Séralini study retracted. GMWatch, 2 August. <http://gmwatch.org/en/news/latest-news/17764>; Claire Robinson and Jonathan Latham (2013). The Goodman Affair: Monsanto targets the heart of science. Independent Science News, 20 May. <https://www.independentsciencenews.org/science-media/the-goodman-affair-monsanto-targets-the-heart-of-science/>

⁷ Foucart S (2016). La discrète influence de Monsanto. Le Monde. 11 July. http://www.lemonde.fr/sciences/article/2016/07/11/la-discrete-influence-de-monsanto_4967784_1650684.html. The contents of this article have been summarised in English in: Robinson C (2016). Emails reveal role of Monsanto in Seralini study retraction. 20 July. <http://gmwatch.org/news/latest-news/17121>

⁸ <http://baumhedlundlaw.com/pdf/monsanto-documents/7-Monsanto-Personnel-Discusses-Plan-Seeking-Retraction-of-Serlani-Glyphosate-Study.pdf> ; <http://baumhedlundlaw.com/pdf/monsanto-documents/8-Monsanto-Scientist-Admits-to-Leveraging-Relationship-with-Food-and-Chemical-Toxicology-Journal.pdf>; <http://baumhedlundlaw.com/pdf/monsanto-documents/13-Monsanto-Email-Confirming-Attempt-to%20Seek-Retraction-of-Serlani-Study.pdf>; <http://baumhedlundlaw.com/pdf/monsanto-documents/14-Monsanto-Emails-Confirming-Undisclosed-Involvement-in-Successful-Retraction-of-Serlani-Study.pdf>

⁹ <http://baumhedlundlaw.com/pdf/monsanto-documents/9-Email-from-Monsanto-Collaborator-to-Food-and-Chemical-Toxicology-Journal.pdf>

¹⁰ Gary Ruskin (2015). Journalists Failed to Disclose Sources' Funding from Monsanto: A Short Report. US Right to Know. 24 November. <https://usrtk.org/gmo/journalists-failed-to-disclose-sources-funding-from-monsanto-a-short-report/>

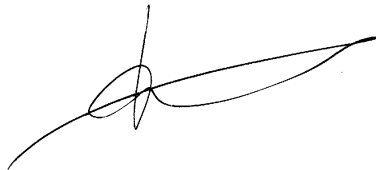
¹¹ <https://www.theguardian.com/environment/2017/sep/15/eu-report-on-weedkiller-safety-copied-text-from-monsanto-study>

academic studies are branded by a lobby group that defends industry "pseudoscience"¹². This campaign is misleading the public and eroding academic science. The public downfall in trust in science that might result will also affect the support for EU research and innovation.

Industry testing its own products is a historical mistake of enormous proportions and is a damaging conflict of interest that should be changed without delay. We have not forgotten about the series of frauds on industry testing (IBT, Craven), when thousands of studies and analysis were falsified or just fabricated. The Monsanto Papers released this summer¹³ give the impression that not much has changed regarding the intentions and operating methods of the pesticide industry.

We ask you to commission a fully independent panel of top-level scientists¹⁴ that have no link whatsoever to industry to redo the review and are looking forward to your reply.

Sincerely yours,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

Hans Muilerman,
Pesticide Action Network.

¹² Dietrich, DeKant, Greim, Boobis, Sharpe, Berry et al., Allowing pseudoscience into EU risk assessment processes is eroding public trust in science experts and in science as a whole: The bigger picture, *Chemico-Biological Interactions* 257 (2016) 1e3

¹³ <https://usrtk.org/pesticides/mdl-monsanto-glyphosate-cancer-case-key-documents-analysis/>

¹⁴ Scientists that are actively publishing on experimental results, no experts that only publish comments, opinions and meeting outcome