



Dr Margaret Chan,  
Director General,  
World Health Organization  
Avenue Appia 20  
1211 Geneva 27

15th June 2015

**Subject: Clarification on the IARC classification of glyphosate**

Dear Dr Chan,

Gafta is the association representing the international grain and feed trade, established in 1878. Our membership comprises over 1,510 trading companies in more than 89 different countries worldwide and promotes free trade globally.

We are contacting you as our members have raised significant concerns about the impact of the IARC classification on the documented safety of glyphosate and the need for clarification to remove the uncertainty in the agricultural and food communities.

Glyphosate has been used for over 40 years in many formulations in 160 countries where Gafta members are actively importing and exporting agricultural commodities. The IARC classification of glyphosate as a Group 2A "probable human carcinogen" is juxtaposed to the scientific conclusions and decisions of regulatory bodies and science organisations around the world. We are concerned with the lack of clarity resulting from the IARC classification as the results are at odds with the statement from JMPR 2011 which confirmed that the long term and short term intakes of glyphosate residues are unlikely to present a public health concern or risk to consumers, the WHO 2005 guidelines, and the International Programme on Chemical Safety 1994 which stated there was no evidence to indicate that glyphosate was carcinogenic, to list a few.

First and foremost, Gafta's view is that sound science must be the foundation of regulatory and safety decisions. The IARC classification focuses on hazard and not risk or exposure. We would be very grateful if WHO would present a clarification on the limitations of this study which addresses the distinction between the hazard classification and a risk assessment, which takes into account the effects of exposure to the purported hazard.

In light of the IARC classification, there is growing uncertainty in world food and agricultural communities about the safety of glyphosate. Without a clarification, the negative impact on global food security could be considerable and we envisage import restrictions and trade disruption.

Trading partners are already beginning to express concern as well. Many countries including Korea are moving to impose restrictions on the use of glyphosate which is worrying for our membership. Furthermore, a ban or import restrictions on crops treated with glyphosate would be contrary to the MRLs established by Codex and prohibit free trade for importers and exporters and again would be without scientific justification of actual risk.

We understand that the WHO has created a task force to look into this issue and whether JMPR should update its assessments. While the task force recommendation is an important step in the JMPR process, it may be insufficient to actually address the confusion and concerns raised by the IARC classification. Gafta hopes WHO will develop a clarification to reassure the agricultural sectors around the globe that they can continue to use glyphosate safely and reliably. Gafta would appreciate if such a clarification could describe the limited scope of the methodology and its focus on hazard over risk. Our members are of the opinion that this clarification would go a long way in reinforcing the fact that glyphosate is among the most thoroughly tested and evaluated products; is vital to reduce crop loss and increase yields; and is safe for use consistent with the national regulatory decisions over the last 40 years.

We look forward to hearing from you.

Yours sincerely,

A handwritten signature in black ink that reads "June Arnold". The signature is written in a cursive, flowing style.

June Arnold  
Head of Policy

*CC: Ian Smith, Executive Director, Director General's Office, WHO.*