

## DECLARATION FROM THE SPANISH FARMING SECTOR IN FAVOUR OF RENEWING THE AUTHORISATION TO USE GLYPHOSATE FOR SUSTAINABLE FARMING

### INTRODUCTION

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As users of plant protection products and suppliers of food and essential raw materials for food, we **farmers and cattle breeders** are the first to be interested in having **safe, environmentally friendly production conditions** for farming professionals, animal welfare and the natural environment. This enables us to **offer consumers premium quality products and maximum health guarantees**, as well as **helping conserve our soils**, water quality and the diversity of our flora and fauna.

Glyphosate-based plant protection products (i.e. formulae that contain glyphosate and other chemical products) are mainly used in farming and market gardening to kill weeds that compete with the crop. **They are used for both conventional agriculture and conservation agriculture.**

Glyphosate is an active substance that is widely used in herbicides and is generally used by the farming community. Its patent **expired in the year 2000** and it is **currently marketed by several highly efficient companies and is available in all Member States at affordable prices for farmers.**

Glyphosate has been used **throughout the world for more than 42 years** and has proven to be an effective, affordable herbicide that is safe for human beings and the environment when following the legally authorised instructions of use.

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### AUTHORISATION RENEWAL PROCESS

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In accordance with the European Union Standing Committee on Plants, Animals, Food and Feed<sup>1</sup>, the **usual renewal period for this type of active substance is 15 years** once the Committee has received **favourable opinions** from the European Food Safety Authority (EFSA) and the rapporteur Member State, which is Germany at present. In the specific case of glyphosate, the Commission also requested that the EFSA examine the responses from the International Agency for Research on Cancer with regard to the potential carcinogenicity of glyphosate, published in April 2015, and requested waiting for the publication of the conclusions from the European Chemicals Agency (ECHA) report on the classification of the substance Glyphosate.

On 29 June 2016, the European Commission established the expiry of the approval of glyphosate in "*six months from the date of receipt of the opinion of the Committee for Risk Assessment of the European Chemicals Agency by the Commission or 31 December 2017, whichever is the earlier*"<sup>2</sup>.

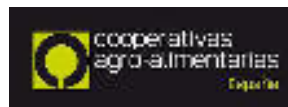
In this same context, on 1 August 2016, the Commission established<sup>3</sup> "*Member States must pay particular attention to the protection of the groundwater in vulnerable areas, in particular with respect to non-crop uses; furthermore, they must pay particular attention to risks from the*

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1 Regulation (EC) No 1107/2009 of the European Parliament and of the Council of 21 October 2009 concerning the placing of plant protection products on the market and repealing Council Directives 79/117/EEC and 91/414/EEC.

2 Commission Implementing Regulation (EU) 2016/1056 of 29 June 2016 amending Implementing Regulation (EU) No 540/2011 as regards the extension of the approval period of the active substance glyphosate

3 Commission Implementing Regulation (EU) 2016/1313 of 1 August 2016 amending Implementing Regulation (EU) No 540/2011 as regards the extension of the approval period of the active substance glyphosate



use in specific areas referred to in Article 12(a) of Directive 2009/128/EC<sup>4</sup>, and must pay particular attention to compliance of pre-harvest uses with good agricultural practices. Member States shall ensure that plant protection products containing glyphosate do not contain the co-formulant POE-tallowamine (CAS No 61791-26-2)."

The rapporteur Member State (Germany) and the European Food Safety Authority (EFSA)<sup>5</sup> reports show that the active substance can remain on the market as it is not likely to hold a potential cancer risk to humans and that tests do not justify classifying it in line with its carcinogenic potential in accordance with the Regulation (EC) No 1272/2008.

Despite favourable opinions of competent Authorities, the renewal process is being delayed as some member states have requested an opinion from the European Chemicals Agency, which is expected before summer 2017.

## PRODUCER SECTOR POSITIONING

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In view of the upcoming debates that will be raised with regards to the glyphosate authorisation renewal process on an institutional level and within the civil society, the Spanish farming sector, represented by Spanish and general Professional Farming Organisations (**young farmers' association and small farmers' union**), **Agri-food cooperatives** from Spain, the Spanish Federation of Associations of Producers and Exporters of Fruits, Vegetables, Flowers and Live Plants (**FEPEX**) and the **Spanish Farming Association of Conservation/Live Soils (AEAC/SV)** would like to declare their **support for said renewal of the authorisation for the maximum period authorised in the community regulation**, justified by the following criteria:

### SCIENTIFIC CRITERIA

**Farming is highly supervised** and its technologies and production techniques are **perfectly regulated and subject to the strictest controls**.

The European Food Safety Authority is the agency responsible for issuing scientific opinions on the safety of food items and their productive processes in the European Union. Legally established in 2002, it is an independent agency of community institutions and Member States and its opinions must be taken into account when legislating issues regarding food security, nutrition, animal welfare and health and plant protection and health. The European Food Safety Authority bases its analysis on the evaluation of risk, i.e. the probability of causing any sort of harm.

In the case of glyphosate, the **EFSA's report<sup>6</sup> concludes "it is unlikely to pose a carcinogenic hazard** to human beings and evidence does not support that it is classified as carcinogenic". Furthermore, the EFSA confirmed that "glyphosate did not show carcinogenic or mutagenic properties and does not have any toxic effect on fertility, reproduction or embryo development".

The legislation itself anticipates that this authorisation, whether new or a renewal, **could be immediately revoked if the Commission were to consider new information that could affect the authorisation**.

We therefore understand that **only sound science and the credibility of the European Food Safety Authority must guide the Commission's decision** with regards the approval or refusal of the authorisation or renewal.

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<sup>4</sup> The spaces used by the general public or vulnerable groups, in accordance with Article 3 of the Regulation (EC) No 1107/2009, such as public parks and gardens, sports and recreation grounds, school grounds and children's playgrounds, and in the close vicinity of healthcare facilities.

<sup>5</sup> <http://www.efsa.europa.eu/en/press/news/151112>

<sup>6</sup> <http://www.efsa.europa.eu/en/press/news/151112>



## ENVIRONMENTAL CRITERIA

Glyphosate **acts effectively in soil conservation, especially in view of the serious erosion problem in Spain**, and reduces tillage works on croplands.

Soil erosion has become unstoppable, although it affects each one of the large production sectors to very different extents.

In accordance with the Spanish programme against desertification (PAND by its acronym in Spanish), managed by the Spanish ministry of agriculture and fishing, food and environment, permanent crops and tree areas represent a larger loss rate at almost 79 tonnes per hectare per year, while arable crops are in second place with more than 30 tonnes.

Soil type and whether there is plant coverage or not are the most notable elements for defining the erosion risk level. In recent decades, we are seeing more continuous cycles of weather conditions favouring strong erosion episodes. The effects of climate change mean that we will face periods of less but heavier rain during certain periods.

Both aspects undoubtedly amplify the problems associated with erosion in most of Spain. This main environmental problem in Spain can be combated through implementing plant cover and developing conservation agriculture or employing minimum tillage.

These cultural and soil handling techniques use glyphosate as its first herbicide option in most cases to control weeds or plant coverage, given that it is a non-residual product with a **broad spectrum and low ecotoxicological profile**.

**Reduced tillage** results in reduced carbon dioxide emissions through two channels, **reduced fuel consumption** and reduced release of CO<sub>2</sub> from the soil via oxidation of the carbon contained within it<sup>7</sup>. To this end, chemical control also reduces greenhouse gas emissions.

Another aspect to take into account is that glyphosate is an active substance that degrades very quickly when it enters into contact with the soil. Therefore, **glyphosate contamination risk of surface waters is minimal**, given that it degrades quickly and because its use related to plant coverage minimises the risk of surface runoffs linked to possible surface water pollution. To this end, even in the event of runoffs, and in accordance with the World Health Organisation (WHO) the presence of glyphosate or its ultimate waste after degradation does not constitute a threat for human health in drinking water<sup>8</sup>.

The **prohibition of this active material would necessarily entail the use of a "cocktail"** of plant protection products that complement one another and combat the broad spectrum of weeds that glyphosate currently covers. We would at least be talking about having to use a herbicide against narrow leaf and another against wide leaf. From an environmental point of view, it is advisable to ask ourselves whether it is better to use a product that is known and has been widely used for more than 42 years or a mixture of several products.

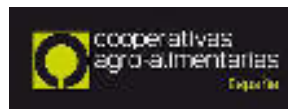
Handling crops without the use of suitable active substances can cause the **carbon footprint to increase up to 47%** in accordance with the assessment conducted by the EU on main crops<sup>9</sup>. Therefore, the use of glyphosate can be considered as a **determining factor for complying**

<sup>7</sup> Basch, G.; Kassam, A.; González-Sánchez, E.J.; Streit, B. 2011. Making Sustainable Agriculture Real in CAP 2020: The Role of Conservation Agriculture. European Conservation Agriculture Federation.

<sup>8</sup> To this end, even in the event of runoffs, and in accordance with the World Health Organisation (WHO) the presence of glyphosate or its ultimate waste after degradation does not constitute a threat for human health in drinking water.

[http://www.who.int/water\\_sanitation\\_health/dwq/chemicals/glyphosateampa290605.pdf](http://www.who.int/water_sanitation_health/dwq/chemicals/glyphosateampa290605.pdf)

<sup>9</sup> This information was extracted from the study "Cumulative impact of hazard-based legislation on crop protection products in Europe," Steward Redqueen for Copa and Cogeca.



with the COP21 objectives related to greenhouse gas reduction and limiting the planet's increasing temperature.

### Conservation agriculture and safe use of plant protection products

Conservation agriculture is a farming production system based on three main principles:

- **Minimum soil disturbance**
- **Permanent soil coverage**
- **Crop rotation**

Putting into practice these three principles provides a social, economic and environmentally sustainable handling of agricultural holdings.

Advantages associated with Conservation Agriculture systems are numerous, including:

- **Increased carbon storage capacity in soils:** The biomass from the crop residues remains in the holding and slowly decomposes, naturally becoming part of the soil. Several studies show that Conservation Agriculture is capable of increasing the soil's carbon content in comparison to conventional agriculture. As an example, recent results in Andalusia show an **average 30% increase of the carbon content** in comparison to conventional agriculture<sup>(6)</sup>.
- **Reduced greenhouse gas emissions** due to less fossil fuel consumption. The aforementioned study shows that **emissions reduced by 19%** due to the use of fossil fuels<sup>(6)</sup>.
- **Drastically reduced erosion and runoff levels** with the subsequent improvement in the soil structure and water balance.

In order to practice this type of farming and be able to benefit from its evident advantages, **land tillage must be omitted**, meaning that **herbicides must be used** in most cases. With Conservation Agriculture, herbicides are used in an **optimised** way, in accordance with the uses and conditions that they are authorised for (crops, application date, doses, etc.). Furthermore, **they do not represent an environmental risk, given that the plant coverage on the surface acts as a barrier and filter**, which ensures that the products do not leave the plot of land where they are applied and they degrade within that space.

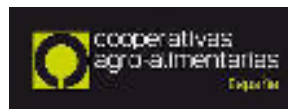
Glyphosate is the herbicide that is most used by farmers in the world. Furthermore, for farmers that use the Conservation Agriculture approach, glyphosate is an essential tool, as it controls weeds at a reduced cost and has a more favourable ecotoxicological profile than other products.

### FINANCIAL AND PRODUCTIVE CRITERIA

Glyphosate is used in conventional agriculture and conservation agriculture and can be applied to help develop most annual and multiannual crops (wheat, barley, sunflower, lucerne, maize, vegetables, beetroot, etc.) and ligneous crops (vines, fruit and olive trees). It can also be used to recover pastures that have been abandoned and overridden by weeds.

Due to its mode of action, glyphosate can be used efficiently in different production process phases, whether before sowing, after pre-harvest or after sowing, or before crop emergencies. Glyphosate is also essentially used for keeping fallow land free of weeds.

Using glyphosate instead of other alternatives for killing off weeds that compete with the main crop entails savings of **9.5%, 15.4% and 21.6% for wheat, legumes and sunflower production** costs, respectively, in accordance with a study conducted in Spain recently (LIFE Agricarbon), which compares conventional and conservation agricultural systems.



The competitiveness between farmers that implement conservation agriculture systems seems to have increased, by increasing production, as shown in the data obtained in the aforementioned study that reveal an average increase in production of between 7% and 8% for crop such as wheat and legumes and 1% for sunflower due to improvements produced in the soil as a consequence of the absence of tillage<sup>10</sup>.

The patent on glyphosate **expired in 2000** (in the USA). It is currently marketed by several companies. **More than 200 plant protection products that contain glyphosate are currently marketed in Europe for agricultural purposes.** In Spain, more than 90 glyphosate-based plant protection products are marketed through several companies.

Glyphosate is **available in all member states at affordable prices, moving away from any suspicion of oligopoly** or any multinational or large corporation abusing a dominant market position. On the contrary, **its prohibition could cause a shortage of such a widely active substance** and an unusual rise in alternative substances.

The EU could fall victim to the incoherence of prohibiting the use of a certain farming practice while authorising the importation of products that have been produced using practices prohibited within the EU. This would in turn **benefit third countries**, which export to the EU, placing European producers at a clear competitive disadvantage.

Due to its extended use, the **withdrawal of this active substance will cause serious problems** for several agricultural sectors of the EU, thus hindering European farmers' competitiveness.

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<sup>10</sup> Information taken from the Layman report from the LIFE+Agricarbon Project: Sustainable Agriculture in the Arithmetic of Carbon (LIFE08 ENV/E/000129), coordinated by the Spanish Farming Association of Conservation/Live Soils.