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New York, NY 10003

Geneva, Tuesday 11 2016

Mr. Geert Dancet
Executive Director
ECHA, the European Chemicals Agency
00121 Helsinki
Finland

Concern: Glyphosate Classification Review

Dear Mr Dancet,

In your opening statement to the European Parliament last October you said:

"REACH requires companies to register their chemicals with us, and to describe their effects on human beings and on the environment. Armed with that knowledge, companies are making safer choices. And we, the Member States and the European Commission are taking action to control any unacceptable risks to humans and the environment".

This is an inspiring vision, and I am writing you on behalf of over 2 million Avaaz members who have signed a petition calling for a fully independent and transparent review of glyphosate. Your leadership can ensure the success of what may well be the most important review that ECHA has undertaken, and its success can define ECHA's reputation at a time of increasing public mistrust in the EU and its institutions.

Avaaz is a global movement for humanity, enabling over 40 million members around the world to raise their voices on issues of public concern. Our community has serious concerns about flaws in how EU authorities have handled the glyphosate dossier so far, and Avaaz members have made thousands of phone calls and sent messages to national and EU decision-makers. With all eyes now on the ECHA process, **I'd like to request the opportunity to meet with you to exchange in person on this issue next week, before we launch our next communication with our members on this issue.**

I am not a scientist, but I am writing to you as a young father, who is extremely concerned about the sheer amount of toxic chemicals released into our environment. My daughter [REDACTED] and it is my responsibility to look after her health as well as possible. Even if we only ate organic produce, free-range meat and eggs and lived up a mountain - it is impossible to avoid exposure to herbicides and pesticides, and prevent the accumulation of high levels of potentially dangerous chemicals in our bodies. As a father yourself, I am sure you understand this.

As you know, glyphosate has become an ubiquitous chemical in terms of presence and persistence - underpinning many common agricultural practices. It is found in very high concentrations in many humans. You have extensive experience working with and designing EU regulatory processes, classifications and authorisations of various chemicals. You know how much is at stake for glyphosate producers and you must understand the public's concerns over the fact that most studies are directly provided by the industry and are not publicly available.

The Avaaz petition calls for you and other regulators to "ensure all reviews are transparent, based on independent studies, and evaluated by independent researchers without conflicts of interest". Ninety-four



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independent scientists have previously outlined their concerns about the EFSA conclusions in an open letter and now the dossier from the German BAUA continues to disregard guidance set forth by ECHA, OECD, IARC and others on how to evaluate carcinogenicity data, the appropriate use of historical controls and the proper use of findings of a positive trend in an animal cancer study. Both EFSA and BfR have called for more research to close the gaps in scientific data and understanding, but no additional studies appear to have been commissioned.

Together, all of this leads to reasonable doubt that glyphosate could be harmful to human health.

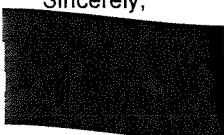
Too often in the past have we ignored such warnings and acted too late. But here there is still time -- as the Executive Director of the ECHA, which you have played such a huge part establishing, millions of citizens are relying on you to make a final assessment on whether and in what circumstances glyphosate is harmful to their health. People are looking to you for the kind of leadership that reaches beyond 'business as usual', adheres to the highest scientific standards, and recognises the extraordinary interest and concern the issue of glyphosate has triggered across the continent. Specifically, we ask you to ensure that ECHA undertakes a robust and credible scientific assessment, including:

1. **Rigour** - a thorough review of the existing science by taking into account all independent studies, with extra careful evaluation of industry-backed studies given potential conflicts of interest;
2. **Feedback** - include and discuss relevant criticism of the assessment methods of previous evaluations by Bfr and Efsa from independent scientists and civil society;
3. **Transparency** - publication of *all* studies cited in the report to allow expert and public scrutiny. Publish all conflict of interest statements and ensure everyone working on the dossier has completed and published ECHA's annual declaration of interest;
4. **Proactivity** - don't just use existing science, but ensure remaining gaps and uncertainties are filled by launching further studies if needed.

The agency you lead has built a strong reputation and adheres to values that our global community strongly identifies with. This is ECHA's chance to live up to its values by respecting 100% transparency, 100% independence and 100% responsibility to improve the quality of life of all citizens.

The Avaaz community wants to support you to do the right thing for our health and the environment, but so far, the glyphosate process has raised many questions. You can put this right and turn the questions into congratulations. We would appreciate the opportunity to meet you soon to discuss ECHA's process. We look forward to hearing from you at your earliest convenience.

Sincerely,



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