

[REDACTED]

From: ECHA EO
Sent: 05 July 2016 13:52
To: ECHA Mail Registration
Cc: ECHA EO
Subject: FW: Glyphosate versus Nutrition

Categories: For green folder

Dear mail registration,
Please register, link to the two e-mails just forwarded to you from this same person and place in the green folder.

Thank you and best regards,

From: [REDACTED]
Sent: 27 June 2016 11:54
To: ECHA EO <executive-director@echa.europa.eu>
Subject: Fw: Glyphosate versus Nutrition

----- Forwarded Message -----

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]

Sent: Monday, 27 June 2016, 7:32
Subject: Glyphosate versus Nutrition

Secretariat (EC-SAM) for the attention of the chair; please copy to Commissioner Carlos Moedas and Director-General Robert-Jan Smits and confirm.

Scientific Advice Mechanism High Level Group (SAM HLG)

Glyphosate versus Nutritional Health

On 2 June 2016 SAM HLG wrote to the Commissioner for Research, Science and Innovation to provide a short note on the (glyphosate) situation (1). It is with regret that I have to say the SAM HLG letter epitomizes what is wrong with the mechanisms that safeguard the nutritional health of EU citizens.

The letter defers to the Glyphosate Task Force (GTF), treating it not only with deference but without criticism in respect of the submission of its unpublished studies, where authors, one can assume, all have a conflict of interest. The legitimacy

of these recent studies is questionable as controls would have been corrupted by chemicals including glyphosate in their feed etc. In the EFSA review one unnamed species of rat was deemed to be prone to tumors - perhaps this is the reason why. Instead the SAM HLG accorded them the unwarranted legitimacy of 'Proprietary Studies'. When the Health Commissioner took a stand and asked for the GTF to publish these papers there was a clear failure to lend support. SAM HLG wrote '...recent correspondence between Commissioner Andriukaitis and the GTF may result in these being made available.' What, I suggest should have been written is: 'The Health Commissioner requested the GTF on 4 April 2016 to publish the proprietary studies. The GTF should comply ASP and not later than 15 June 2016.'

Criticism of the EFSA glyphosate review is its failings to examine harm deriving from glyphosate penetrating the placenta (2), the possible harm from chemicals from processed foods mixing internally with ingested glyphosate residues forming N-nitrosoglyphosate (3), harm caused to good bacteria in the human gut and its stimulating effect on pathogens there (4) and knowingly (5) but denied (6) accumulation of glyphosate in the bone/bone marrow, which is known to cause clastogenic and cytotoxic effects in mice (7). Anthony Samsel and Stephanie Seneff have produced a series of papers that commence with the postulation that ingested glyphosate residues cause a range of modern diseases, including cancer (8). Their sixth paper due publication asserts that glyphosate, acting as a glycine analogue, may be mistakenly incorporated into peptides during protein synthesis. The title and abstract of this paper, which includes 'harms' are at Reference 9 below.

This century has seen deterioration in health of the people of the USA (10) and here in the EU. A manifestation of this is growth of cancer incidence, e.g. in the UK every second person can now be expected to experience cancer in their lifetime (11). Sir Robert McCarrison (12) demonstrated last century that faulty nutrition, with or without infection, leads to ill health. Poor health is constantly being blamed on people's lifestyles; the reality is I suggest, that it is being caused by increasingly poor nutrition, due primarily to agriculture based on the use of glyphosate. However difficult it is, glyphosate should not be permitted to be used on food crops as it is injurious to human health.

Yours Sincerely

26 June 2016

Copy:

Geert Dancet

[REDACTED]

References and Notes:

1. SAM HGL 2 Jun 16: Ares (2016)2574583 – 02/06/2016: Explanatory note on scientific advice for the regulatory assessment in plant protection products.
2. Monika Krueger et al 2014: Detection of Glyphosate in Malformed Piglets.
3. [REDACTED], Inc 1 Feb 2010: Analysis of N-Nitroso Glyphosate in Glyphosate Samples.
4. Anthony Samsel & Stephanie Seneff 2013: Glyphosate's suppression of cytochrome P450 enzymes and amino acid biosynthesis by the gut micro biome: Pathways to modern diseases.
5. As quoted in GLYPHOSATE 95-169 JMPR 2004 p98.
6. The EFSA Review states that 'absorbed glyphosate is..... showing no potential for bioaccumulation'
7. Saheo Prased et al 2009:Clastogenic Effects of Glyphosate in Bone Marrow Cells of Swiss Albino Mice.
8. See Ref 4 above.
9. Glyphosate pathways to modern diseases V: Amino acid analogue of glycine in diverse proteins: Anthony Samsel 1, * and Stephanie Seneff 2, **

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Glyphosate, a synthetic amino acid and analogue of glycine, is the most widely used biocide on the planet. Its presence in food for human consumption and animal feed is ubiquitous. Epidemiological studies have revealed a strong correlation between the increasing incidence in the United States of a large number of chronic diseases and the increased use of glyphosate herbicide on corn, soy and wheat crops. Glyphosate, acting as a glycine analogue, may be mistakenly incorporated into peptides during protein synthesis. A deep search of the research literature has revealed a number of protein classes that depend on conserved glycine residues for proper function. Glycine, the smallest amino acid, has unique properties that support flexibility and the ability to anchor to the plasma membrane or the cytoskeleton. Glyphosate substitution for conserved glycines can easily explain a link with diabetes, obesity, asthma, chronic obstructive pulmonary disease (COPD), pulmonary edema, adrenal insufficiency, hypothyroidism, Alzheimer's disease, amyotrophic lateral sclerosis (ALS), Parkinson's disease, prion diseases, lupus, mitochondrial disease, non-Hodgkin's lymphoma, neural tube defects, infertility, hypertension, glaucoma, osteoporosis, fatty liver disease and kidney failure. The correlation data together with the direct biological evidence make a compelling case for glyphosate action as a glycine analogue to account for much of glyphosate's toxicity. Glufosinate, an analogue of glutamate, likely exhibits an analogous toxicity mechanism. There is an urgent need to find an effective and economical way to grow crops without the use of glyphosate and glufosinate as herbicides.

10. Steven Woolf & Lauden Aron US Health in International Perspective 2013: Shorter Lives, Poorer Health.

11. Ahmed et al 2015: Trends in the lifetime risk of developing cancer in Great Britain: comparison of risk for those born from 1930 to 1960.

Sir Robert McCarrison Small Farms: Nutrition and National Health