

# PAD 2017/036\_Disclosure\_Enclosure

Number of Glyphosate PAD requests since 2012	PAD register number	Subject *	REQUEST DATE
1	2012/74	*Request for "access to the documents containing the following information": 1. The names of member states who tested glyphosate residues in food samples in fruits, vegetables and cereals (as stated in your report 2008 Annual Report on Pesticide Residues according to Article 32 of Regulation (EC) No 396/2005); 2. The names of member states who tested glyphosate in the years 2009, 2010 and 2011; 3. The full list of specific cereals, fruits and vegetables, which were tested in each of the member states.	22/12/2012
2	2013/7	*All documents originating from industry applicants relied upon in EFSA's 2012 opinion on lentils that describe industry toxicological tests on glyphosate and its formulations conducted on animals over a long-term period – of over 90 days and up to three years in duration, and of this or any longer duration in the case of multigenerational studies. These tests may include, but are not necessarily restricted to, carcinogenicity studies; developmental, reproductive and teratogenicity studies; and multigenerational studies.	07/02/2013
3	2014/41	*As BfR refers to the complete edition of EFSA about "Glyphosate" including the BfR section report we kindly ask you to send as this report as soon as possible	13/08/2014
4	2015/54	*Any letters, documentation of meetings and email correspondence in relation to the ongoing re-assessment of glyphosate and more in particular, "internal exchanges, including meetings and email correspondence" and "external exchanges with European Commission; Governments and government agencies of EU Member States including Germany; Governments and government agencies of other countries including the US and Canada; IARC (International Agency for Research on Cancer); Glyphosate Task Force, ECPA (European Crop Protection Association), EuropaBio; Companies Aventis, BASF, Dow, DuPont, Monsanto, Syngenta (or consultants/lawyers acting on their behalf)."	01/06/2015
5	2015/93	*The glyphosate renewal assessment report prepared by the German authority Bundesamt fuer Risikoforschung, revised on 29th January 2015 with the title Volume 1, Report and proposed decision; • The glyphosate renewal assessment report prepared by the German authority Bundesamt fuer Risikoforschung , Volume 3, Annex B.6.1 Toxicology and Metabolism . Revised 29th January 2015; • The glyphosate renewal assessment report prepared by the German authority Bundesamt fuer Risikoforschung, List of Endpoints, Active Substance Glyphosate. Report and Proposed Decision. Revised 29th January 2015.	26/08/2015
6	2015/0101	*full assessment report on glyphosate as it was sent to EFSA by BfR in April 2015.	31/08/2015
7	2015/103	*Germany has sent Efsa an addendum to its RAR about Glyphosate (I believe in August 2015). Could you please answer the following questions?  1. Could you please send me the addendum? There is a big public interest in Germany's position on Glyphosate, considering the public debate about Glyphosate and Germany's actions in the renewal process.	09/09/2015
8	2015/104	Glyphosate BfR addendum regarding IARC. Request in GER	08/09/2015
9	2015/105	*Germany Rapporteur Member State. (2015a). Glyphosate Renewal Assessment report, Volume 1. Report amd Proposed Decision. Revised 29th, January 2015 Germany Rapporteur Member State. (2015b). Glyphosate Renewal Assessment report, Volume 3, Annex B.6.1 Toxicology and meatbolismReport amd Proposed Decision. Revised 29th, January 2015	08/09/2015
10	2015/0116 CA of PAD 2015/101	*Although the final version of the RAR will be published by EFSA soon, there is a need to appeal for two reasons: 1. The process of renewal of admission for glyphosate in the EU has attracted a high public interest. Glyphosate is by far the widest used pesticide and traces of the substance can be found almost ubiquitary, including farm animals and human urine, milk, soils and even human breast milk. The process has been closely followed by newspapers, radio and public television, by activities of NGOs and in parliamentary debate and questions. According to Regulation 1049/2001, article 4 (3), public interest overrides the institutions' interest in protection of their desicion making process. As EFSA's final assessment will be of major importance in the renewal of admission for gylphosate, the full process of desicion making within EFSA must be open for public scrutiny. 2. The original request did not ask for access to the final RAR EFSA will publish by the end of october, but to the version presented by the BfR in April. As you might know, the positive evaluation of glyphosate by the BfR has resulted in accusations against the institution being corrupted, to close to industry interests or under illegitimate instruction by the german Federal Ministry for Food and Agriculture. These and similar accusations came from the scientific community, the public and within parliament. As it is a public institution, the quality of the BfR's work must be open to public scrutiny. Therefore, we need the original version of the RAR as presented by the BfR in april and its addendum as presented by the BfR in september.	19/10/2015
11	2015/0121	*copies of any e-mail traffic related to "glyphosate" between officials at EFSA and the following e-mail exchanges: @monsanto.com, @syngenta.com, @croplife.org, @ecpa.eu – between Jan. 1, 2015, and today	13/11/2015
12	2015/0134	*Declarations of interests of the experts of EFSA's Pesticides Unit involved in the assessment of glyphosate as well as those of the member state experts	02/12/2015
13	2015/137	*copies of the exchanges with the European Glyphosate Taskforce, or any consultant that they used, within the time period specified. (Since Jan 1, 2015.)	08/12/2015
14	2015/138	I would like to apply for access to documents for all the comments made on glyphosate by [REDACTED], one of the member state experts. I would like all his comments – written or the transcripts of the video conference meetings.	08/12/2015

15	2015/139	*All documents on the mandates received and peer reviews performed by EFSA, - on Glyphosate, - the IARC-study on Glyphosate and - the co-formulant POE-tallowamine.	08/12/2015
17	2015/144	*Dols of the experts involved in the glyphosate assessment (following the article in EUFood Policy last week)	10/12/2015
18	2015/145	*participant list peer review of glyphosate	10/12/2015
19	2016/0010	*Any correspondence between EFSA and IARC over the setting up of the meeting on glyphosate in the months of December and January, including the draft agenda if there is one yet.	22/01/2016
20	2016/0027	*All correspondence (including emails), agendas, minutes of meetings and any other reports of such meetings where the findings of the International Agency for Research on Cancer (IARC) regarding the potential carcinogenicity of glyphosate or glyphosate-containing plant protection products were discussed by EFSA officials (between March 2015 and March 2016).	02/03/2016
21	2016/0029	*NAMES AND FUNCTIONS OF THE SPECIFIC MEMBERS OF EFSA AND NAMES AND FUNCTIONS OF THE EXTERNAL EXPERTS THAT WERE INVOLVED IN THE EFSA DECISION ON GLYPHOSATE AND WHO WERE NOT NAMED IN THE OTHER DOCUMENTS WE ASKED FOR	03/03/2016
22	2016/0031	*As Corporate Europe Observatory revealed it in January regarding the reassessment of glyphosate which led to the report published by EFSA on 12 November 2015,"An access to documents request at EFSA by CEO delivered the following results: among the 73 national experts who participated in EFSA's peer review on glyphosate, only 14 agreed for their names to be disclosed as their country's representative in the process. At least, EFSA detailed the name of the national organisations these experts belonged to. "	31/03/2016
23	2016/032	*documents from the Advisory Forum meeting 8 and 9 March under the access to documents legislation – any presentations, reports, documents etc relating to: 11.2 glyphosate – harmful carryover of glyphosate originating in GM soya	14/03/2016
24	2016/0034	*on the basis of regulation (EC) No 1049/2001 on public access to documents and regulation (EC) No 1367/2006 on the application of the provisions of the Århus Convention, request access to all documents that have been used during the EFSA peer review. Our request covers complete documents and not only their summaries, and extends also to the names of the authors and their declarations of conflicts of interests. <u>Reasoning:</u> There is an alarming scientific controversy between the EFSA and IARC with regard to the carcinogenicity of glyphosate. In March 2015, IARC concluded that glyphosate is a probable human carcinogen (category 2A) . However, later that same year, in November 2015, EFSA concluded that glyphosate is "unlikely to pose a carcinogenic hazard to humans and the evidence does not support classification with regard to its carcinogenic potential" . Proper classification of glyphosate is crucial because it potentially affects public health and entails important regulatory consequences. It is therefore vital to investigate why there are contradictory results in the EFSA and IARC assessments. To date EFSA has explained that its "evaluation considered a large body of evidence, including a number of studies not assessed by the IARC which is one of the reasons for reaching different conclusions" (EFSA news story, 12 November 2015 - <a href="http://www.efsa.europa.eu/en/efsajournal/pub/4302">http://www.efsa.europa.eu/en/efsajournal/pub/4302</a> ). This means that the EFSA peer review is based on unpublished studies whose findings cannot yet be verified and subjected to independent scrutiny. The need to achieve clarity in this regard is both urgent and evident. Glyphosate is used in around 750 pesticides commercialised by 91 companies across the globe. According to data published by IARC, glyphosate is registered in "over 130 countries as of 2010 and is probably the most heavily used herbicide in the world." ( <a href="https://monographs.iarc.fr/ENG/Monographs/vol112/mono112-09.pdf">https://monographs.iarc.fr/ENG/Monographs/vol112/mono112-09.pdf</a> ) The European Union is obliged to take decisions as openly as possible so that it contributes to strengthening the principles of democracy and respect for fundamental rights, and to ensure the protection of human health, which the EU is committed to ensure in all of its policies and activities.	15/03/2016
25	2016/0049	*I would like to make an access to documents request for the correspondence (emails, letters, notes of calls) between EFSA and the owners of the unpublished glyphosate studies. I am reliably informed that you have already received a request for this so this will not involve you hopefully in any extra work. I would like the letters EFSA has sent to the study owners asking for permission to publish the studies, and, of course, the replies! I am primarily interested in the 14 key studies, (not all 82!) which the Glyphosate Task Force offered to put in a reading room with data deleted.	02/06/2017
26	2016/0086	*1. The documents (presentations, EFSA documents etc) for the Advisory Forum meeting held this week. Will you put them on your web pages as usual in a few weeks' time? 2. A list of all the access to documents requests that you have received since 12 August 2016. Just the requests ie NOT who made them or whether you granted access or not. 3. The agenda for the private part of the management board to take place on 4 October in Parma 4. The draft action plan on improving the pesticide assessment procedure which was discussed with member states at your pesticide network in June. When considering this request, please bear in mind the European Court's judgement in the Pesticide Action Network Europe case this month which states that if you refuse the request on the grounds that it would affect the decision making process, you have to prove to me that releasing it would seriously interfere with this process, which, of course, it wouldn't. 5. Any emails, letters, notes of phone calls from the Glyphosate Task Force, its members, or their representatives (such as their lawyers) with regard to your announcement yesterday to share the glyphosate raw data with CEO and four Green MEPs. Can I make a forward request to cover anything you receive by next Friday or do I have to write again next Friday and do it retrospectively?  Finally, I am quite interested, as you can imagine, in you releasing this glyphosate data to the four MEPs and CEO. If someone else were to make a request in two months' time to have access to all the information that you have provided them with, would that involve you any extra work (apart from obviously copying it onto a CD and replying with a letter)?	30/09/2016
27	2016/0104	*all original studies, including raw data, that are at the basis of the EDSP-assessment, for estrogen, androgen as well as for thyroid disruption, and any other document used for the assessment of endocrine disrupting properties of Glyphosate (EC mandate - M-2016-0194)	15/12/2016
28	2016/0106	*raw data and findings (aggregated in tables and figures) of the unpublished studies submitted to EFSA for the peer review of the active substance glyphosate and requested under Regulation (EC) No 1049/2001	19/12/2016

29	2016/0109	<p>*on the topic of the active substance glyphosate, all correspondence (including emails), agendas, phone logs, minutes of meetings or any other reports of such meetings between officials/representatives of EFSA and officials/representatives of the Bundesinstitut für Risikobewertung (BfR), including -- although not limited to -- the following individuals:</p> <p>██████████  ██████████  ██████████  ██████████  ██████████  ██████████</p> <p>(between March 2015 and December 22th 2016)</p>	22/12/2016
30	2017/001	<p>*documents containing information "on the topic of the active substance glyphosate, all correspondence (including emails), agendas, minutes of meetings or any other reports of such meetings between officials of EFSA and representatives of (one or more of) the following organizations:</p> <p>-Bayer  -Monsanto  -Syngenta  -ECPA  -Cefic  -Glyphosate Task Force  -Hume Brophy  -Fleishman-Hillard  -Interel European Affairs  -EPPA SA  -FTI Consulting Belgium  -Grayling  -Kreab  -Weber Shandwick  -acumen public affairs  -Steptoe &amp; Johnson LLP  -Dr. Knoell Consult</p> <p>(between January 2016 and January 2017)</p>	03/01/2017
31	2017/005 CA 2016/034	*Appeal to EFSA's decision PAD 2016/034 on partial disclosure of 75 unpublished studies used for the renewal assessment of glyphosate and the non-disclosure of Dols and names of experts	10/01/2017
32	2017/016 CA of 2016/104	*appeal to EFSA's decision not to release the studies on endocrine mandate glyphosate	03/03/2017
33	2017/023	*the names of all EFSA staff memebbers-specifically, but not limited to, members of EFSA;s pesticide Unit - and experts from Member States, and possibly also other individuals, involved in the peer review of the pesticide risk assessment of the active substance glyphosate	10/04/2017

\*THE ORIGINAL WORDING OF THE REQUEST