EUROPEAN COMMISSION
HEALTH AND FOOD SAFETY DIRECTORATE-GENERAL

Deputy Director-General for Food Safety

Brussels,
SANTE/E4/VW/np

Dear Dr Url,

Subject: **Request to consider the impact of glyphosate residues in feed on animal health**

Glyphosate is an active substance included in Annex I to Directive 91/414/EEC and deemed to be approved under Regulation (EC) No 1107/2009, for which the notifier applied for renewal in line with the provisions of Commission Regulation (EU) No 1141/2010.

On 12 November 2015, EFSA published its Conclusion on the peer review of the pesticide risk assessment of the active substance glyphosate. In that Conclusion, and based on the assessment of the representative uses evaluated, EFSA did not raise concerns as regards harmful effects on animal health. Since the absence of harmful effects on animal health is part of the authorisation criteria for plant protection products (Article 29(1)(e) in conjunction with Article 4(3)(b) of Regulation (EC) No 1107/2009), the impact of glyphosate residues in feed on animal health (and through consumption of food products of animal origin also on human health) is assessed by the competent authorities of the Member States before granting authorisations for glyphosate-containing plant protection products for uses in their territory.

A significant amount of food and feed is imported into the EU from third countries. This includes food and feed produced from glyphosate-tolerant GM crops. Uses of glyphosate-based plant protection products in third countries are evaluated by the competent authorities in those countries against the locally prevailing regulatory framework, but not against the criteria of Regulation (EC) No 1107/2009.

All food and feed placed on the market in the EU has to comply with the maximum residue levels (MRLs) set under Regulation (EC) No 396/2005. MRL setting is preceded by a consumer risk assessment. The absence of harmful effects on human health is thus

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ensured even for products exposed to glyphosate in third countries. Since Regulation (EC) No 396/2005 has a strong focus on consumer protection, animal health aspects are considered for MRL setting only as regards their impact on human health and therefore data related to animal health only are not required.

While the Commission is not aware of any information demonstrating that there is a potential problem with regards to glyphosate residues and animal health, it is nevertheless desirable to address this issue through a risk assessment focused on animal health, to inform risk managers' deliberations.

EFSA is hence requested under Article 31 of Regulation (EC) No 178/2002 to assess the available information on glyphosate residues in feed, including in particular feed imported from outside the EU/third countries, e.g. glyphosate-tolerant GM crops, and conclude on the possible impact of those residues on animal health.

EFSA should request information from companies involved in (1) the renewal of the approval of the active substance glyphosate, (2) MRL applications and companies authorised to place feed produced from GM crops on the EU market.

EFSA is requested to deliver its Scientific Opinion at the same time as the Reasoned Opinion on the review of the existing MRLs for glyphosate according to Article 12 of Regulation (EC) No 396/2005.

My services remain at your disposal for further information. On this matter, you can contact Mr Volker Wachtler (tel: +32-2-29-58305) who is responsible for this dossier in the pesticide sector of Unit E4.

Yours sincerely,

Ladislav Miko

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