



**STELLA KYRIAKIDES**  
MEMBER OF THE EUROPEAN COMMISSION  
HEALTH AND FOOD SAFETY

Rue de la Loi, 200  
B-1049 Brussels – Berl 10/380  
[stella.kyriakides@ec.europa.eu](mailto:stella.kyriakides@ec.europa.eu)

Brussels, 26 June 2024

Dear Sir,

On 24 January 2024, you submitted a request for internal review<sup>1</sup> under Article 10 of Regulation (EC) No 1367/2006 (the ‘Aarhus Regulation’)<sup>2</sup>, on behalf of the following NGOs: Pesticide Action Network Europe, ClientEarth, Générations futures, GLOBAL 2000, Pesticide Action Network Germany and Pesticide Action Network Netherlands.

The request for internal review concerns Commission Implementing Regulation (EU) 2023/2660 of 28 November 2023 renewing the approval of the active substance glyphosate in accordance with Regulation (EC) No 1107/2009 of the European Parliament and of the Council and amending Commission Implementing Regulation (EU) No 540/2011<sup>3</sup> (the ‘Reviewed Regulation’).

The Reviewed Regulation was adopted pursuant to Article 20 of Regulation (EC) No 1107/2009 concerning the placing of plant protection products on the market<sup>4</sup> (the ‘PPP Regulation’) and renewed the approval of the active substance glyphosate.

---

<sup>1</sup> Registered on 25 January 2024 under reference Ares(2024)577798.

<sup>2</sup> Regulation (EC) No 1367/2006 of the European Parliament and of the Council of 6 September 2006 on the application of the provisions of the Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters to Union institutions and bodies, OJ L 264, 25.9.2006, p. 13.

<sup>3</sup> Commission Implementing Regulation (EU) 2023/2660 of 28 November 2023 renewing the approval of the active substance glyphosate and amending Commission Implementing Regulation (EU) No 540/2011, OJ L, 2023/2660, 29.11.2023.

<sup>4</sup> 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, OJ L 309, 24.11.2009, p. 1.

Mr Martin Dermine  
PAN Europe  
Rue de la Pacification 67  
1000 Bruxelles  
Belgique  
By email: [info@pan-europe.info](mailto:info@pan-europe.info)

In your request, you put forward several grounds for the review of the Reviewed Regulation, summarised as contesting:

- first, the methodology and outcome of the risk assessment related to: 1) the toxicity assessment of the formulation for representative uses, 2) the genotoxicity of glyphosate, 3) the carcinogenicity of glyphosate, 4) effects of glyphosate on the microbiome, 5) the neurotoxicity and reproductive toxicity of glyphosate, 6) endocrine disrupting properties of glyphosate, 7) toxicity of glyphosate to animals (including ecotoxicity), 8) effects of glyphosate on biodiversity, 9) exposure to glyphosate via inhalation, and 10) a systematic failure to take independent scientific literature into account;

and

- second, the appreciation of the risk assessment outcome by the Commission as risk manager.

The Commission has considered the admissibility of the request in the light of the provisions of Title VI of the Aarhus Regulation, and its Articles 10 and 11 in particular. The Commission considers that the organisations having submitted the request comply with the criteria set out in Article 11 of the Aarhus Regulation and are therefore entitled to make a request for internal review. The request has been lodged within the time limit and with indication of grounds, in accordance with Article 10(1) of the Aarhus Regulation. The Commission therefore considers that your request is admissible.

The Commission has carefully assessed the grounds put forward in the request for internal review. On this basis, the Commission considers that the Reviewed Regulation does not contravene EU environmental legislation and that the request is unfounded. The detailed Commission assessment of the grounds for review is enclosed in the Annex to this letter.

For the sake of expediency, the Commission has initially responded to your request in English. A translation in French will follow in due course.

Should you disagree with this reply, you may bring the matter before the European Ombudsman or before the General Court in accordance with the provisions laid down in Articles 228 or 263, respectively, of the Treaty on the Functioning of the European Union.

Yours sincerely,



Enclosure:

- Annex - Assessment of the grounds for the request of internal review of the Reviewed Regulation