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Submission To:

The Director, Chemical Review, Australian Pesticide and Veterinary Medicines Authority (APVMA)

PO Box 6182, KINGSTON, ACT 2604

Regarding the proposal not to place Glyphosate under formal reconsideration.

Friends of the Earth Australia request the APVMA to place Glyphosate under formal reconsideration.

We request that the Authority not only place under formal reconsideration the Active Ingredient Glyphosate, but also all the formulations and variations of the herbicides that contain Glyphosate as an active constituent; and that these formulations be tested and assessed as whole formulations not just as individual chemicals, both for short term and for long term exposure, as is clearly stated as being required in the *Agricultural and Veterinary Chemicals Code Act 1994* in Section 4 Part 1, Object of Code in Division 1 (b).

We further entreat the APVMA when undertaking the reconsideration of Glyphosate for potential carcinogenicity to also assess both the whole formulations as well as the claimed active constituent, for other potential toxic effects as well, as required in the *Act* (in Section 1A Implementing the Code clause 2) which requires the APVMA to protect the health and safety human beings, animals and the environment.

We specifically request:

(i) That the APVMA review and assess all published research into Glyphosate formulations for all types of toxicity including endocrine disruption in both humans and animals. This would of course include low dose endocrine disruptive effects, which may impact on fertility, birth defects and reproductive systems.

(ii) That the APVMA also review published impacts of Glyphosate on genotoxicity, neurotoxicity, liver and kidney damage and the ecotoxic impacts of Glyphosate in both humans and animals, including off-target effects.

(iii) That the reconsideration assess and consider all research and findings into the long term exposure to Glyphosate based herbicides and in particular sub-chronic impacts, including the potential for damage and disruption to both human and animal gut microbiome, enzyme activity, digestive illness, gut disruption and nutrient deficiencies.

(iv) That the APVMA assess and consider the use of nanomaterials in conjunction with Glyphosate, particularly the potential for nanoparticles to *"amplify"* the toxic effects of Glyphosate.

(v) That the APVMA independently pay for, verify, assess and update obsolete data used to determine current Australian NOEL and ADI levels for Glyphosate. The determination of the NOEL and ADI, should be based on peer reviewed science and not on unpublished, industry funded science. (eg Lankas, G.R.; Hogan, G.K. (1981) A Lifetime Feeding Study of Glyphosate (Roundup Technical) in Rats: Project No. 772062. (Unpublished study received Jan 20, 1982 under 524-308; prepared by Bio/dynamics, Inc., submitted by Monsanto Co., Washington, D.C.; CDL:246617-A; 246618; 246619; 246620; 246621). MRID 00093879 Please note that Leydig cell tumour is a very rare cancer).

We also request the APVMA extend the period available for public input to this decision by a further 90 days so as to allow more time for members of the public to make submissions on this important issue.

Finally, it is concerning that the APVMA, consider IARC assessments to be incomplete because of industry confidential information, which appears to be favoured above published independent science. ***"The IARC assessment did not consider unpublished proprietary studies available to pesticide regulators."***
Ref: Q28 ANSWERS TO QUESTIONS ON NOTICE Supplementary Budget Estimates October 2015
http://www.aph.gov.au/Parliamentary_Business/Senate_Estimates/rratctte/estimates/sup1516/ag/index

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20/12/2016