

Hon. Jane Philpott  
Minister of Health  
Ottawa

June 25, 2017

Dear Minister Philpott:

**Re-registration of glyphosate by the Pesticide Management Regulatory Agency (PMRA)**

I am writing to express my opposition to the re-registration of glyphosate by the Pesticide Management Regulatory Agency (PMRA).

As you know, the International Agency for Research on Cancer (IARC) concluded that glyphosate is a 'probable human carcinogen', putting it into IARC category 2A due to sufficient evidence of carcinogenicity in animals, limited evidence of carcinogenicity in humans and strong evidence for two carcinogenic mechanisms.

Serious concerns have been expressed by scientists that the Renewal Assessment Report on glyphosate by the European Food Safety Authority (EFSA) is scientifically flawed and is based on an over-reliance on industry-provided studies, that are not publicly available and that use a limited set of assays that define the minimum data necessary for the marketing of a pesticide.

An article by 94 scientists published in the Journal Of Epidemiology & Community Health in March 2016 documents the scientific flaws in the EFSA Renewal Assessment Report. The article, *Differences in the carcinogenic evaluation of glyphosate between the International Agency for Research on Cancer (IARC) and the European Food Safety Authority (EFSA)* is available here:  
<http://jech.bmj.com/content/70/8/741.full.pdf>.

I trust that you agree that it is scientifically and ethically unacceptable to rely on studies that are not publicly available and that have been provided by vested interests. I trust that the scientific flaws in the EFSA Assessment Report, documented in the article, are of concern to you.

I wish to also draw to your attention the fact that US court documents show that Monsanto exerted influence on the EPA to change its classification of glyphosate as a Class C Carcinogen (which indicates potential carcinogenic effect) to a Class E category (which suggests "evidence of non-carcinogenicity for humans"). The court documents may be accessed at  
<https://usrtk.org/pesticides/mdl-monsanto-glyphosate-cancer-case-key-documents-analysis/>.

I trust that you agree that this evidence of improper influence by Monsanto on the EPA to change its scientific assessment of glyphosate is extremely disturbing and scientifically and ethically unacceptable. This misconduct is particularly disturbing for Canadians and for your responsibilities as Minister of Health since PMRA has accepted the EPA finding that "glyphosate is unlikely to be genotoxic or carcinogenic".

I therefore urgently request that the re-registration of glyphosate in Canada be suspended, that the tainted, industry-influenced EPA evaluation be rejected and that the Canadian government initiate an

independent, transparent evaluation that is based on proper scientific and ethical standards, uncontaminated by industry influence.

I call on you to demonstrate ethical and scientific leadership in this matter and to put the health of Canadians ahead of powerful corporate interests and influence.

I request a detailed reply to the concerns and the request I have expressed above.

Sincerely,

A handwritten signature in black ink that reads "Kathleen Ruff". The name "Kathleen" is written in a cursive style, and "Ruff" is written in a more stylized, blocky cursive.

Kathleen Ruff  
RightOnCanada.ca