



August 24, 2017

Dear Minister of Health,

Canadians need to trust that you are listening to the latest scientific research when it comes to concerns about our health and environment.

25 million kilograms of glyphosate-based pesticides, such as Monsanto's Round Up, are used in Canada every year.

After concluding a lengthy 7-year evaluation, Health Canada recently announced that glyphosate does not pose unacceptable risks to the health of Canadians and our environment and can continue to be widely used. This evaluation was deeply flawed. One month ago, [we provided 58 pages of scientific evidence](#) to explain its limitations.

Glyphosate has been classified by the International Agency for Research on Cancer of the World Health Organization as a "probable carcinogen". Health Canada's evaluation failed to consider, or dismissed, multiple studies linking glyphosate and cancer and relied heavily on old data submitted by the pesticide industry itself.

Furthermore, Health Canada states that glyphosate's impact on microbiomes – communities of microorganisms that are crucial for both healthy human guts and soil quality – is beyond the scope of their review. This is hard to legitimize given that Health Canada's evaluation cites research studies where animals exhibit gut problems which could be related to changes in microbiomes.

Health Canada's evaluation also failed to consider glyphosate's impact on monarch butterflies, a species recently upgraded to "Endangered" by the Committee on the Status of Endangered Wildlife in Canada. Glyphosate is designed to kill all weeds, including milkweed and other flowering plants which monarchs depend on for breeding and feeding.

Beyond the limitations of the evaluation, the effectiveness of the proposed risk management strategies is not supported by evidence. For example, Health Canada requires improved label warnings, despite multiple studies revealing critical limitations of labelling in reducing risk and exposure. This strategy puts the onus on individuals to protect themselves and their communities, while putting health and safety of the majority of Canadians in the hands of the

minority applying the pesticide. Health Canada also states that maintaining “buffer zones” around agricultural fields will protect sensitive terrestrial or aquatic habitats, but recent research in Quebec demonstrates that this strategy is not effective.

Finally, a close look at Health Canada’s bibliography reveals that multiple studies are referenced twice under different study codes, as though giving the impression that the arguments are better supported than they actually are.

Minister Philpott, it has been one month since we made you aware of the limitations of the evaluation and we urge you to establish an expert review panel to examine the quality of the evaluation and decision on glyphosate, as stated in the law that regulates pesticides in Canada.

Canada is quickly falling behind other nations, like Italy, France and Sri Lanka which all have stronger restrictions in place. Canadians deserve these same protections, and at the very least, need to trust in Health Canada’s process of risk evaluation.

Sincerely,

Équiterre, David Suzuki Foundation, Prevent Cancer Now, Canadian Association of Physicians on the Environment (CAPE), and Environmental Defence