<u>Annex 2</u> to the GDCh/SEC Open Letter of June 16th 2020 to the European Commission

Regarding the current discussion of more advanced nonselective herbicide technologies in Europe

Immediate Consequences of too a rapid complete ban of Glyphosate

From the multitude of respective publications circulating in the internet we quote mostly from

- Steinmann-Theuvsen-Groewitt_Rahmenbedingungen_Glyphosat(5).pdf:
 Partial reduction of glyphosate use is possible and desirable, particularly to combat spreading of glyphosate-resistant weed populations; desiccation should be, could be and actually is already limited to very few extreme weed situations; however, a complete ban of glyphosate is undesirable in stubble-cultivation. There is no better alternative to glyphosate to combat difficult to control weed and volunteer grain; under circumstances of elevated risk of erosion (water, wind) there is no better countermeasure than application of glyphosate; in summary publishers do not recommend a complete ban of glyphosate in the EU.
- Glyphosat-Machbarkeitsstudie, Universität für Bodenkultur (BOKU), Wien 02.07.2020 (science.apa.at, Medizin & Biotech) Under favourable circumstances application of glyphosate may be limited but must not be entirely banned. There are no alternative herbicides existing with comparable spectrum of activity; alternative treatment methods entail severe economic consequences from -9% to 74% lower contribution margins to the farmer.
- 3) BMEL Fragen und Antworten zu Glyphosat, 29.08.2019: Was sind Alternativen zu glyphosathaltigen Pflanzenschutzmitteln in der Landwirtschaft" Chemical alternatives to glyphosate may be applied; combination of such products may be necessary to achieve comparable results; if non-chemical methods shall be applied, there exist only mechanical methods (mulching, ploughing, harrowing) or thermal methods (flaming); all mechanical methods are not sustainable and need more fuel; ploughing increases risk of erosion; in areas of increased risk of erosion glyphosate is difficult to replace.
- Oxford Economics "The impact of a Glyphosate ban on the UK Economics, Summary report, June 2017"

Following a ban, farmers will need to adopt more mechanical and labour-intensive means to control weeds.

Will have significant negative impact on UK farmers; increasing reliance on imports; impact of ban not just limited to agriculture. The changes in farming practices as a result of the ban are projected to see agriculture's contribution to GDP fall some £ 930 million, as the sector's demand for inputs from British suppliers alters.

Summary of most important consequences:

- Isolation of Europe, no other major world region will abandon the advantages of glyphosate.
- 2) European agricultural output will be lower than previously, farmers will be forced to use more mechanic methods with higher labour cost and higher CO₂ emission.
- 3) Europe will become more and more dependent on imports of herbal foods with maximum glyphosate residual levels different from EU standards.
- 4) No publication of Glyphosate opponents referring to consequences of too a rapid complete ban of glyphosate was found in the internet. The publishers quoted here unanimously do not support such a complete ban.