

## EXECUTIVE SUMMARY

This Petition seeks to immediately suspend and cancel all glyphosate registrations. The Environmental Protection Agency (EPA) is tasked with regulating pesticides in the United States, pursuant to the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), 7 U.S.C. §136 et seq. In accordance with FIFRA, EPA can register a pesticide only upon determining that it will cause no unreasonable adverse effects on the environment when used in accordance with widespread and commonly recognized practice. *Id.* § 136a(c)(5)(A)-(D). To remain registered, a pesticide must continue to meet this FIFRA safety standard. To ensure this, EPA is required to periodically review pesticide registrations in light of new science and uses. *Id.* § 136a(g)(1)(A). EPA began this review process for glyphosate in 2009 and despite spending eleven years, produced a review decision that was vacated by the Ninth Circuit because it was deemed insufficient with regard to its human health assessment and cancer classification decision. EPA subsequently withdrew the remainder of glyphosate's registration review decision, but has taken no further action. The result is that today, glyphosate remains registered despite no demonstration by EPA that it can meet the required FIFRA safety standard for this herbicide's currently approved uses. In other words, *glyphosate as it's currently used has no legal safety assessment on record.*

Petitioners are farmworkers, environmental, and agriculture public interest groups, all with a core mission interest in protecting human and environmental health from the dangers of glyphosate. Glyphosate is the most widely used pesticide in the world, with approximately 300 million lbs being applied annually just in the United States. The pesticide endangers human health in a myriad of ways. The world's foremost authority on carcinogens, the International Agency for Research on Cancer, and medical scientists the world over recognize the pesticide to be a probable carcinogen. Glyphosate's adverse impacts on the liver, kidney and reproductive system have been recognized for decades, and a growing body of evidence links glyphosate exposure to metabolic syndrome. The environment faces similarly devastating impacts from the potent herbicide, with 93% of threatened and endangered species likely being adversely affected, and Monarch butterfly populations facing decimation.

The wealth of evidence demonstrates glyphosate as registered today cannot meet FIFRA's required safety standard. FIFRA defines "unreasonable adverse effects on the environment" as "any unreasonable risk to man or the environment, taking into account the economic, social, and environmental costs and benefits of the use of any pesticide." *Id.* § 136(bb). Glyphosate's harms are expansive and threaten human health, especially the health of applicators, farmworkers and landscapers, as well as our most vulnerable species, and these well-documented harms far outweigh any benefits glyphosate may have. And EPA has no valid assessment demonstrating otherwise. Cancellation and

suspension are not simply warranted, they're necessary as glyphosate's continued registration is illegal.

This Petition seeks an immediate suspension of glyphosate, until such time that EPA can affirm the pesticide warrants cancellation or can demonstrate that glyphosate meets the required FIFRA safety standard, an eventuality of which Petitioners are skeptical. In the alternative, Petitioners request that at the very least, EPA initiate special review to assess the human health impacts of glyphosate and its formulations, particularly from occupational uses, as well as their adverse environmental impacts and costs.