

**Bronwyn Roe**  
1910-777 Bay Street, PO Box 106  
Toronto, Ontario M5G 2C8  
Tel: 416-368-7533 ext. 529  
Fax: 416-363-2746  
Email: [broe@ecojustice.ca](mailto:broe@ecojustice.ca)  
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December 12, 2025

*Sent via e-mail*

Hon Marjorie Michel  
Minister of Health  
[hcminister.ministresc@hc-sc.gc.ca](mailto:hcminister.ministresc@hc-sc.gc.ca)

Dear Minister Michel:

**Re: Request for no further renewals or registrations of glyphosate-based pest control products and a special review of glyphosate toxicity and carcinogenicity**

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I write on behalf of Friends of the Earth Canada, Safe Food Matters, David Suzuki Foundation, Environmental Defence, and Prevent Cancer Now to reiterate our request that no renewals, registrations, or amendments<sup>1</sup> of glyphosate-based pest control products be granted and to call for an expedited special review of the toxicity, including carcinogenicity, of glyphosate.

**Recent scientific developments impact the PMRA's conclusions on acceptable risk**

In our letter to Health Canada's Pest Management Regulatory Agency dated September 5, 2025, we requested that the PMRA not approve or renew any glyphosate-based pest control products until it has reviewed the Ramazzini Institute Global Glyphosate Study, Panzacchi, Tibaldi and De Angelis, 2025, "Carcinogenic effects of long-term exposure from prenatal life to glyphosate and glyphosate-based herbicides in Sprague–Dawley rats"<sup>2</sup> and updated the glyphosate risk assessment taking this study into account. Panzacchi, Tibaldi and De Angelis, 2025, described by the authors as "the most comprehensive toxicological study ever conducted on glyphosate and glyphosate-based herbicides", found that low doses of glyphosate cause multiple types of cancer in rats. The authors have explained that their findings "reinforce IARC's classification of glyphosate as a probable human carcinogen." Uniquely, a large proportion of cancer deaths occurred during the first year of life (deaths typically occur during the second year of life in Sprague-Dawley rats). This is consistent with this century's rapid increases in early onset cancers in young Canadians.

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<sup>1</sup> With the exception of amendments to cancel or discontinue uses.

<sup>2</sup> Panzacchi, S., Tibaldi, E., De Angelis, L. *et al.* Carcinogenic effects of long-term exposure from prenatal life to glyphosate and glyphosate-based herbicides in Sprague–Dawley rats. *Environ Health* 24, 36 (2025).  
<https://doi.org/10.1186/s12940-025-01187-2>

In correspondence to Safe Food Matters dated July 31, 2025 you noted that “Health Canada is aware of this study and is working closely with international colleagues to establish the best path forward to review the study.” **Please provide an update regarding the PMRA’s progress in reviewing Panzacchi, Tibaldi and De Angelis, 2025.**

More recently, on November 28, 2025, the journal *Regulatory Toxicology and Pharmacology* formally retracted Williams Kroes and Munro, 2000,<sup>3</sup> a study the journal notes was “widely regarded as a hallmark paper in the discourse surrounding the carcinogenicity of glyphosate”, and which the PMRA referenced in its re-evaluation of glyphosate (RVD2017-01). The article also reviewed subchronic toxicity studies. In its retraction notice, the journal explained the retraction is based on “several critical issues that are considered to undermine the academic integrity of this article and its conclusions”, including concerns about the objectivity of the toxicity and carcinogenicity assessments, lack of authorial independence, and the failure to disclose the involvement of Monsanto employees as co-writers of the article.

In 2018, following a review of the “Monsanto Papers” – discovery documents released in litigation in the United States – Ecojustice identified Williams Kroes and Munro, 2000 as one of several studies included in the PMRA re-evaluation of glyphosate in which Monsanto’s role is uncredited or unclear.<sup>4</sup>

The PMRA reviewed six studies on cancer in the glyphosate re-evaluation, and three of these were part of the Williams Kroes and Munro, 2000 review. The PMRA also consulted foreign reviews in its assessment of these six studies. As stated in the journal’s retraction, the objectivity of the conclusions of three of these six studies is now called into question. These studies must now be reconsidered. The PMRA’s conclusion on one of the three remaining studies was “equivocal evidence of oncogenicity”. The review also considered subchronic toxicity studies considered by PMRA.

Both the concerns regarding the objectivity of the studies outlined in the retracted Williams Kroes and Munro, 2000 and the recently published findings of Panzacchi, Tibaldi and De Angelis, 2025 significantly alter the weight of evidence in the PMRA’s assessment of glyphosate’s toxicity and carcinogenicity, and therefore impact the PMRA’s determination of acceptable risk. **In light of these developments, the PMRA cannot have reasonable certainty that no harm to human health, future generations or the environment will result from exposure to or use of glyphosate-based pest control products as required by subsection 2(2) of the *Pest Control Products Act*, and therefore no registrations or renewals can be granted under sections 7 or 8 of the Act or section 16 of the *Pest Control Product Regulations*.<sup>5</sup>**

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<sup>3</sup> Retraction notice to “Safety evaluation and rerisk assessment of the herbicide roundup and its active ingredient, glyphosate, for humans” [Regul. Toxicol. Pharm. 31 (2000) 117-165]:  
<https://www.sciencedirect.com/science/article/pii/S0273230099913715>

<sup>4</sup> Media Backgrounder: Health Canada’s re-evaluation of glyphosate and the Monsanto Papers (November 2018):  
[https://ecojustice.ca/wp-content/uploads/2018/11/FINAL\\_Monsanto-Papers-background.pdf?x89810](https://ecojustice.ca/wp-content/uploads/2018/11/FINAL_Monsanto-Papers-background.pdf?x89810).

<sup>5</sup> As of December 11, 2025, there are 13 pending applications for glyphosate-based pest control products listed on the registry, including two category “C” amendment applications, three category “L” new applications, and eight category “D” renewal applications.

**We therefore request:**

- 1. That no further registrations or renewals of glyphosate-based pest control products be approved;**
- 2. Pursuant to subsection 17(4) of the *Pest Control Products Act*, an expedited special review of the toxicity, including carcinogenicity, of glyphosate, considering up to date science.**

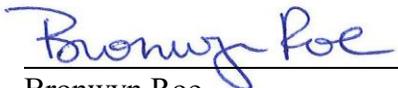
In the course of the special review, we urge the PMRA to apply the precautionary principle in subsection 20(2) of the Act and exercise its powers under subsection 20(1)(b) of the Act to cancel or amend the conditions of glyphosate registrations as necessary to prevent adverse health impacts, including to infants and children.

We look forward to receiving your response in accordance with subsection 17(5) of the Act.

**Additional concerns regarding forestry spraying and pre-harvest applications**

In addition, we continue to have serious concerns about the overall acceptability of the health and environmental risks of glyphosate, given current use patterns. We reiterate that the PMRA must consider up to date science on: (1) the environmental risks of aerial spray application in forestry,<sup>6</sup> including the reduction of biodiversity, and in particular habitat of wildlife; (2) health risks of aerial spray application in forestry, including dietary exposure; and (3) health risks of pre-harvest application in agriculture, including maximum residue limit exceedances.

Sincerely,



Bronwyn Roe  
Barrister & Solicitor

cc: Matt Jones, Assistant Deputy Minister, PMRA  
Jason Flint, Director General and Chief Registrar, Registration Directorate, PMRA  
Dr. Michael Rosu-Myles, Director General, Health Evaluation Directorate, PMRA  
Beatrice Olivastri, Friends of the Earth Canada  
Mary Lou McDonald, Safe Food Matters  
Lisa Gue, David Suzuki Foundation  
Cassie Barker, Environmental Defence  
Meg Sears, Prevent Cancer Now

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<sup>6</sup> <https://safefoodmatters.org/wp-content/uploads/2025/05/Forest-Spraying-Forest-Food-SFM-Report.pdf>