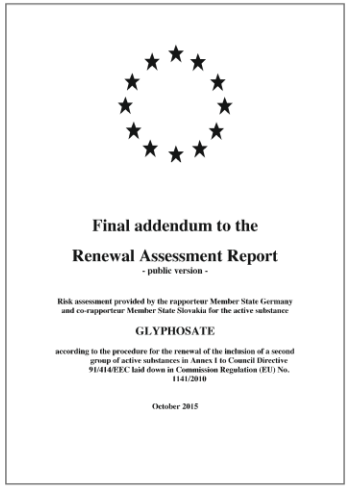
Stefan Weber (Salzburg/Dresden) and Helmut Burtscher-Schaden (Vienna) 2019

In collaboration with Till Radinger (Cologne, Plagiarism Documentation Support) and Hannes Fuß (Berlin, Visualisation)

Peer reviewed by Jonathan Bailey (New Orleans, PlagiarismToday) and Gerhard Dannemann (Berlin, Humboldt University; VroniPlag Wiki)

Detailed Expert Report on Plagiarism and superordinated Copy Paste in the Renewal Assessment Report (RAR) on Glyphosate



Final addendum to the

Renewal Assessment Report

- public version -

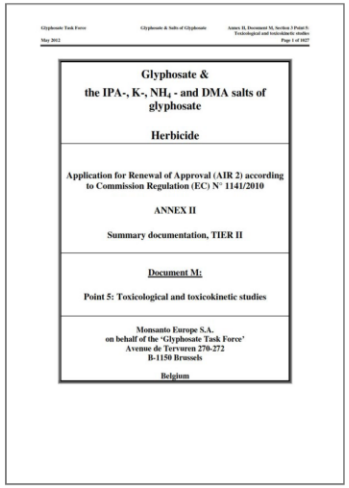
Risk assessment provided by the rapporteur Member State Germany and co-rapporteur Member State Slovakia for the active substance

GLYPHOSATE

according to the procedure for the renewal of the inclusion of a second group of active substances in Annex I to Council Directive 91/414/EEC laid down in Commission Regulation (EU) No. 1141/2010

October 2015

VS.



Glyphosate &

the IPA-, K-, NH_4 - and DMA salts of glyphosate

Herbicide

Application for Renewal of Approval (AIR 2) according to Commission Regulation (EC) N° 1141/2010

ANNEX II

Summary documentation, TIER II

Document M:

Point 5: Toxicological and toxicokinetic studies

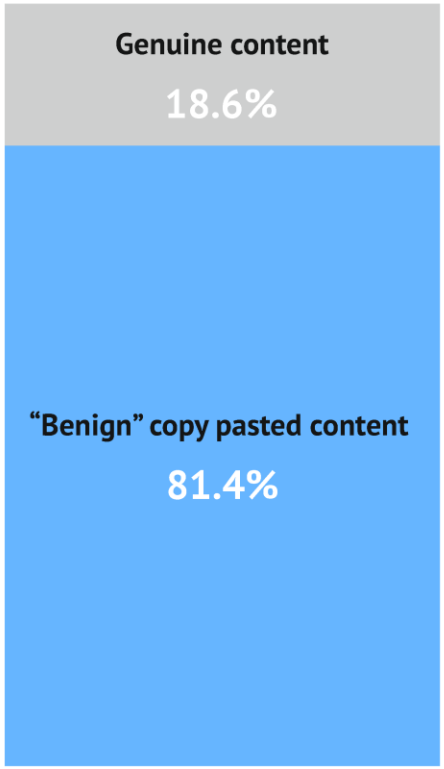
Monsanto Europe S.A.
on behalf of the 'Glyphosate Task Force'
Avenue de Tervuren 270-272
B-1150 Brussels

Belgium

1 *Overview of shares of "benign" copy pasted and plagiarised („malign" copy pasted) content, differentiated in industry studies and published literature in Volume 3 B.6 of the RAR*

TOPIC: INDUSTRY STUDIES

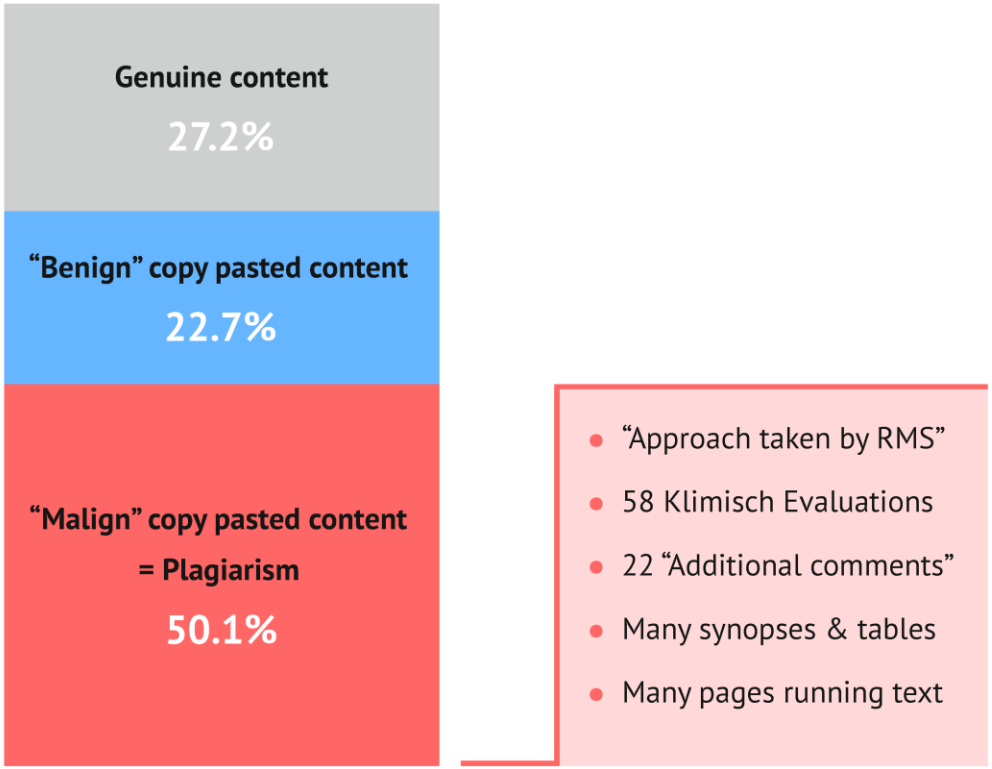
(Commentaries in italics by the BfR)



In total: 1,564,952 characters incl. blanks

TOPIC: PUBLISHED LITERATURE

(Not a single commentary in italics by the BfR)



In total: 482,094 characters incl. blanks

Article 11 of the REGULATION (EC) No 1107/2009 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 21 October 2009 concerning the placing of plant protection products on the market and repealing Council Directives 79/117/EEC and 91/414/EEC:

The rapporteur Member State shall make an independent, objective and transparent assessment in the light of current scientific and technical knowledge.

GUIDANCE OF EFSA

Submission of scientific peer-reviewed open literature for the approval of pesticide active substances under Regulation (EC) No 1107/2009, p. 1:

placing of plant protection products on the market. The EFSA Guidance is intended for: (1) applicants submitting dossiers on active substances of plant protection products under Regulation (EC) No 1107/2009; (2) EU Member States' competent authorities evaluating the dossiers and preparing the draft assessment reports; and (3) the European Food Safety Authority (EFSA), responsible for drawing conclusions on the dossiers. This

Principles of "Good Scientific Practice“ in the Federal Institute for Risk Assessment (BfR), p. 2:

The following are to be considered as misconduct in particular:

1. Misrepresentations

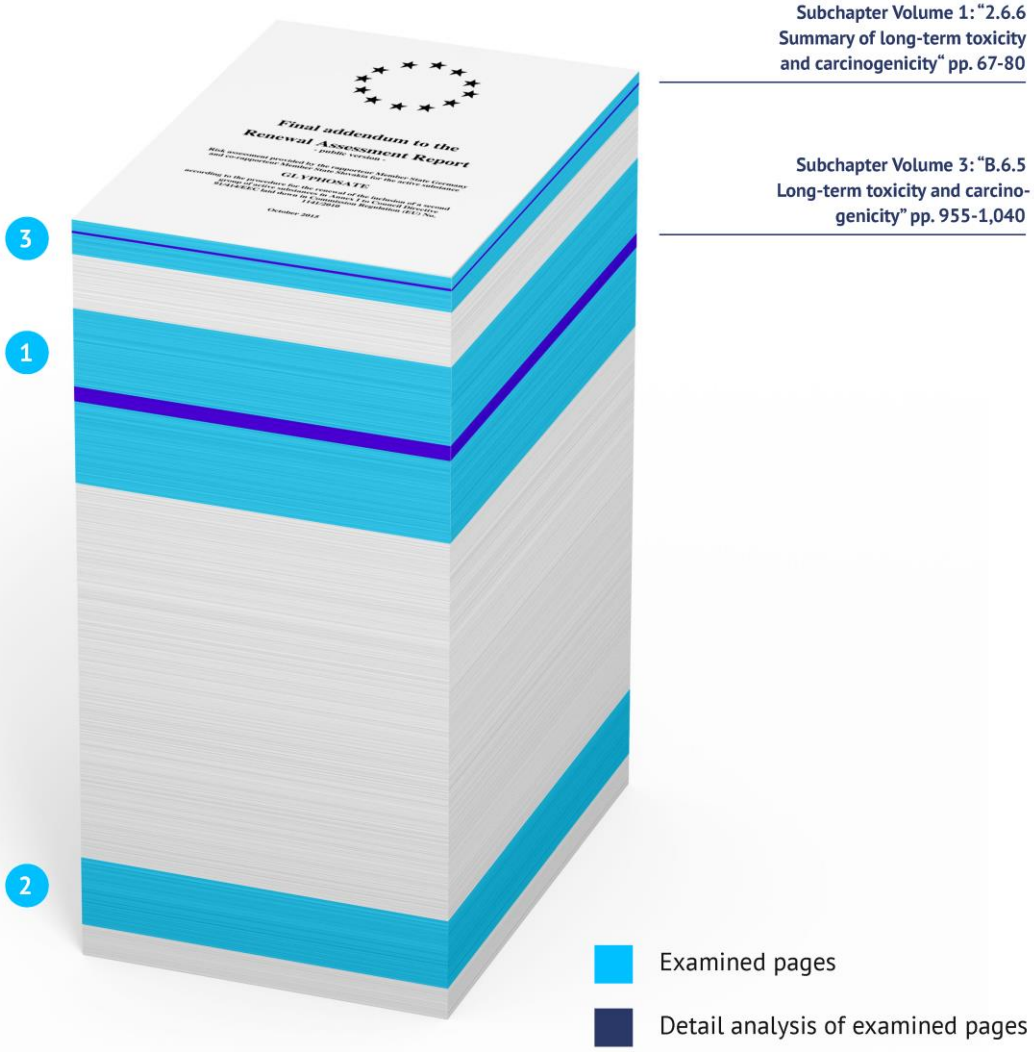
   - inventing or falsifying data,
   - inventing or falsifying evaluations,
   - inventing or falsifying results,
   - incorrect statements made in an application for employment or for funding,
   - fictitious information regarding publications and/or research reports.

2. Violation of intellectual property with regard to a work created by a third party and protected by copyright or of third party major scientific findings, hypotheses, teachings or research approaches especially by means of:

   - Unauthorised use under the pretence of authorship (plagiarism),
   - Exploitation of research approaches and ideas, especially in the capacity of expert/reviewer (theft of ideas),
   - Presumption or unfounded acceptance of scientific authorship or co-authorship,
   - Falsification of content,
   - Deliberately delaying the publication of a scientific work, especially in the capacity of editor or reviewer, or
   - Unauthorised publication or facilitation of unauthorised third party access whilst the work, findings, hypotheses, teachings or research approach has not yet been published.

The research topics of our copy paste and plagiarism study are the following parts of the 4,322-page document, "Final addendum to the Renewal Assessment Report" on Glyphosate, hereinafter referred to as the "**RAR**". Chronological order of the analysed chapters in this expert report:

1. **Volume 3 B.6 Toxicology and metabolism** (1,004 pages): Assessment of glyphosate health effects, based on industry studies and peer-reviewed published literature. Responsible authority: BfR (Federal Institute for Risk Assessment, Germany)
2. **Volume 3 B.9 (Appendix) Evaluation of peer-reviewed literature regarding ecotoxicity** (406 pages): Assessment of environmental effects, based on peer-reviewed literature. Responsible authority: UBA (German Environment Agency)
3. **Volume 1 Report and Proposed Decision** (196 pages): Summary of the evaluations in Volume 3 and overall assessment.



Our colouring

Colouring of “benign“ copy paste in this expert report

Colouring of plagiarism (= “malign” copy paste) in this expert report

Colouring of “benign” copy paste and plagiarism (= “malign” copy paste) alltogether

1 ***Overview of shares of "benign" and "malign" copy pasted and plagiarised („malign" copy pasted) content, differentiated in industry studies and published literature in Volume 3 B.6 of the RAR***

Topic	Number of characters*	Share of characters* within the total adjusted Vol. 3 B.6	Share of "benign" and "malign" copy paste in characters*	Share of "benign" and "malign" copy paste in %	Share of plagiarism in characters*	Share of plagiarism in %
Industry studies	1,564,952	66.7%	1,274,105	**81.4%**	0	0%
Published literature	482,094	20.6%	350,800	**72.8%**	241,331***	**50.1%**
Neither nor**	297,530	12.7%	5,359	1.8%	4,117	1.4%

* Including blanks

** Other content than industry studies nor published studies: e.g. table of contents, introductory remarks, list of references, and other annexes

*** The following text categories were not classified as plagiarism (even if they were integrated within larger passages of plagiarised content): Copy pasted abstracts from published literature with source citations; "*Quoted from article" and copy pasted citations of responses/discussions in the context of assessments of published literature.

PLAGIARISM – RAR, p. 513: *General introduction and explanation of the approach taken by RMS*

The technical databases that have been used for the literature search include: Web of Science[SM], BIOSIS Previews®, CAB Abstracts® (CABI), MEDLINE®, and CA Plus (Chemical Abstracts Plus). The searches were made on glyphosate acid, glyphosate salts (including isopropyl amine, potassium, ammonium, and methylamine), and AMPA, and their related chemical names and CAS numbers. Searches based on these search terms were also found suitable to identify publications that consider glyphosate and surfactants (such as polyoxyethylenealkylamines, or POEA) in the context of glyphosate formulations.

ORIGINAL – APPLICATION, p. 731:

became readily available. The technical databases that are used for the search include: Web of Science[SM], BIOSIS Previews®, CAB Abstracts® (CABI), MEDLINE®, and CA Plus (Chemical Abstracts Plus). The searches are done on glyphosate acid, glyphosate salts (including isopropyl amine, potassium, ammonium, and methylamine), and AMPA, and their related chemical names and CAS numbers. Searches based on these search terms will also identify publications that consider glyphosate and surfactants, (such as polyoxyethylenealkylamines, or POEA), in the context of glyphosate formulations.

PLAGIARISM – RAR, p. 945:

Klimisch evaluation

Reliability of study:	Not reliable
Comment:	No positive controls were included, which significantly detracts from the utility of a non-validated, non-standard test method. Less than the standard of a minimum of three dose levels used, independent coding of slides for scoring and results not reported separately for replicates.
Relevance of study:	Not relevant (Non-standard test system, no positive controls to verify test method/study validity.)
Klimisch code:	3

ORIGINAL – APPLICATION, p. 932:

KLIMISCH EVALUATION

1. **Reliability of study:**		**Not Reliable**
	Comment:	No positive controls were included, which significantly detracts from the utility of a non-validated, non-standard test method. Less than the standard of a minimum of three dose levels used, independent coding of slides for scoring and results not reported separately for replicates.
2. **Relevance of study:**		**Not Relevant** (Non-standard test system, no positive controls to verify test method/study validity.)
3. **Klimisch code:**		**3**

PLAGIARISM – RAR, p. 533:

Additional comments:

Hardell and Eriksson (1999, ASB2012-11838) conducted a case control study to look for associations between reported pesticide use and non-Hodgkin's lymphoma (NHL). The study included 404 NHL cases and 741 controls. The measure of association in this study was the odds ratio (OR), a statistic that estimates of the ratio of disease rates (in this case NHL rates) for exposed and unexposed populations.

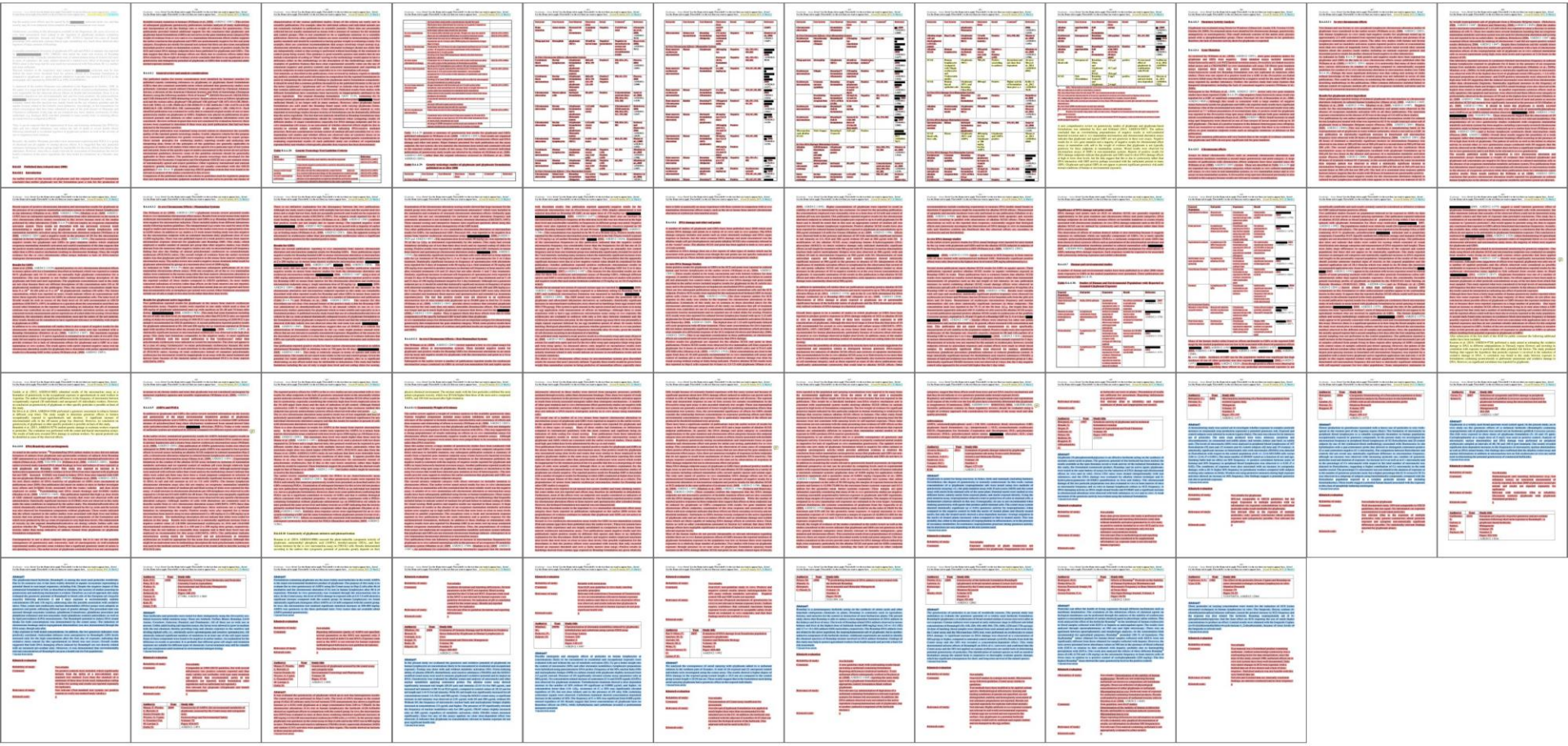
ORIGINAL – APPLICATION, p. 854:

Response 3 – Monsanto Review by John Acquavella, PhD and Donna Farmer, PhD

Executive Summary

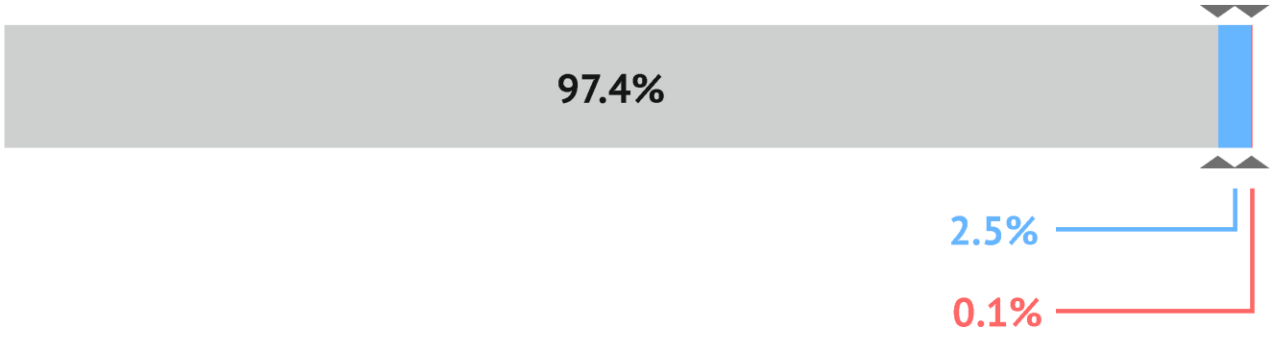
Hardell and Erikkson conducted a case control study to look for associations between reported pesticide use and non-Hodgkin's lymphoma (NHL). The study included 404 NHL cases and 741 controls. The measure of association in this study was the odds ratio (OR), a statistic that estimates of the ratio of disease rates (in this case NHL rates) for exposed and unexposed populations.

1 *"Benign" copy paste (blue) and plagiarism (red) in the chapter "Published data (released since 2000)" on Genotoxicity of Glyphosate, pp. 909-954 in Volume 3 B.6 of the RAR*

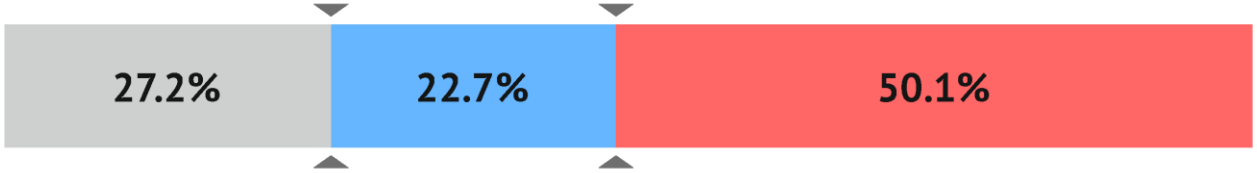


2 1 *"Benign" copy paste and plagiarism (= "malign" copy paste) shares of the BfR compared to the UBA*

UBA, Vol. 3 B.9



BfR, Vol. 3 B.6, published literature



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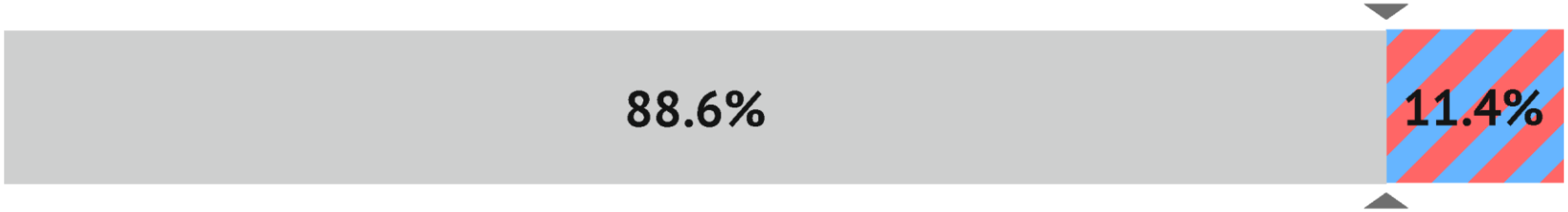
Detailed Expert Report on Plagiarism and superordinated Copy Paste in the RAR on Glyphosate. Visualisation: Hannes Fuß

3 *"Benign" and "malign" copy paste share in Vol. 1*



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Detailed Expert Report on Plagiarism and superordinated Copy Paste in the RAR on Glyphosate. Visualisation: Hannes Fuß

Download the full report,

all compared public files and all raw data:

https://bit.ly/Copy-Paste-Glyphosate