



California Forest Pest Council

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Dedicated to protecting California's forests since 1951

www.caforestpestcouncil.org

September 29, 2015

Dear Ms. Esther Barajas-Ochoa
Office of Environmental Health Hazard Assessment (OEHHA)
P.O. Box 4010, MS-19B
Sacramento, CA 95812-4010

RE: NOIL glyphosate

The California Forest Pest Council (CFPC) appreciates your consideration of our comments on the proposed listing of glyphosate as "known to cause cancer" by OEHHA based on recent actions by the International Agency for Research on Cancer (IARC).

Regulatory agencies in California, the United States and internationally have concluded that the proper labeled use of glyphosate is safe for human health, wildlife, and the environment. The United States Environmental Protection Agency (U.S. EPA) classifies glyphosate in its most favorable category for carcinogenicity, i.e. Group E, "evidence of non-carcinogenicity in humans". The U.S. EPA does not consider glyphosate to be a human carcinogen based on studies of laboratory animals in which there was no compelling evidence of carcinogenicity.

Based on more than 40 years of the safe use of glyphosate in forest (and urban) landscapes and decades of thorough and robust analysis by regulatory agencies on the safe use of glyphosate the CFPC recommends the following:

1. Do not list glyphosate as a carcinogen under the labor code provision of the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65).
2. Consider in your review the recently completed study of glyphosate conducted on behalf of the European Union that provides relevant scientific data regarding the safe use of glyphosate. Also please review past scientific data that shows no link between glyphosate and an increase in cancer. The U.S. EPA is currently under another registration review for glyphosate.

Thank you for taking the time to consider our comments which hopefully provide useful information in making your decision regarding the listing of glyphosate.

Sincerely,

Bob Rynearson
Chairman, California Forest Pest Council

The California Forest Pest Council was founded in 1951 and is a non-profit educational organization of over 800 public and private forest managers, researchers, foresters, entomologists, pathologists, biologists, and others interested in the health of California's forests and protection from damage caused by animals, diseases, insects, pollution, and weeds.