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October 5, 2015

Regarding: *NOIL Glyphosate*

Ms. Barajas-Ochoa,

Please accept these comments on my behalf in opposition to the Office of Environmental Health Hazard Assessment's (OEHHA) intention to list glyphosate under the Labor Code provision of the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65).

As part of an integrated pest management plan, golf course superintendents have selected glyphosate as an economic and effective choice for weed management. In addition to weed control, Glyphosate based products have shown particular success in aiding in the removal of turf on golf courses during California's historic drought saving billions of gallons of water in the process.

Glyphosate-based herbicides have been evaluated in laboratory and field studies for behavior in the environment and potential impact to non-target organisms. The results of these studies indicate that application of glyphosate-based herbicides in accordance with label directions do not pose an unreasonable risk of adverse effects to wildlife and the environment.

Glyphosate-based herbicides have a long history of safe use. They present a low risk to human health and animals and are unlikely to leach into groundwater from the soil. So far, no other herbicide alone combines all of these characteristics, which is why glyphosate-based herbicides are used to control weeds on golf facilities throughout California.

Regulatory authorities and independent experts around the world have reviewed numerous long-term carcinogenicity and genotoxicity studies and agree that there is no evidence that glyphosate causes cancer, even at very high doses, and that it is not genotoxic. Glyphosate-based herbicides are among the most thoroughly tested in the world. Their history of safe use is supported by one of the most extensive worldwide human health, crop residue and environmental databases ever compiled on a pesticide product.

The International Agency for Research on Cancer's (IARC) misclassification of glyphosate should not be used by OEHHA to list glyphosate under Prop 65. It is based on a limited hazard identification approach and does not consider real-world use and exposure, which is a key element of the thorough risk assessments conducted by regulators. The IARC classification also overlooked decades of thorough and robust analysis by regulatory agencies, including a multi-year assessment just completed on behalf of

the pesticide regulatory authority in the European Union. Another registration review is currently underway by the U.S. EPA.

In addition, during the IARC review, relevant scientific data were excluded and/or dismissed as not contributing to reach the conclusion, including the recently completed review conducted on behalf of the European Union and many independent studies. No link between glyphosate and an increase in cancer is identified when the full data set is included in a full review.

In the U.S., the E.U. and most other countries worldwide, no herbicide can be used until it has been thoroughly reviewed and approved for its intended use. No regulatory agency in the world considers glyphosate to be a carcinogen. In fact, the U.S. EPA has placed glyphosate in its most favorable category for carcinogenicity. Glyphosate's history of safe use is supported by decades of data from more than 800 scientific studies – many conducted by independent researchers.

The golf maintenance industry supports the safe and labeled uses of glyphosate and we strongly disagree with OEHHA's intention to list glyphosate under Prop 65.

Sincerely,

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