

Ventura County Agricultural Association

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October 20, 2015

Ms. Esther Barajas-Ochoa
Office of Environmental Health Hazard Assessment
P.O. Box 4010, MS-19B
Sacramento, California 95812-4010

Re: *NOIL Glyphosate*

Ms. Barajas-Ochoa:

Please accept these comments from Ventura County Agricultural Association 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 & Toxic Enforcement Act of 1986 (Proposition 65). If OEHHA chooses to accept the International Agency for Research on Cancer's (IARC) classification as a singular basis for Prop 65 listing without further scrutiny or review and does not evaluate the weight or quality of evidence, it will overlook errors in IARC's process that resulted in the misclassification of glyphosate.

In the U.S., the E.U. and most other countries, no herbicide can be used until it has been thoroughly reviewed and approved for its intended use. And 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. The scientific data on glyphosate also consistently demonstrates no evidence for developmental and reproductive toxicity, genotoxicity, endocrine disruption potential, neurotoxicity and immunotoxicity. Glyphosate's history of safe use is supported by decades of data from more than 800 scientific studies – many conducted by independent researchers. Based on the overwhelming weight of evidence and the consensus of regulatory agencies around the world, IARC's listing is scientifically unwarranted and unsound.

The IARC classification 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 which classified glyphosate as non-carcinogenic. Another registration review is currently underway by the U.S. EPA. The EPA has previously classified glyphosate in its most favorable carcinogenicity category, indicating evidence of non-carcinogenicity, and in 2014, reviewed more than 55 epidemiological studies conducted on the possible cancer and non-cancer effects of glyphosate and concluded: "this body of research does not provide evidence to show that glyphosate causes cancer, and it does not warrant any

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change in EPA's cancer classification for glyphosate."¹ The IARC classification is also 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.

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

To put it simply, IARC's conclusion is not supported by scientific data and is inconsistent with numerous multi-year, comprehensive assessments conducted by hundreds of scientists from countries worldwide who are responsible for ensuring public safety.

Notably, glyphosate specifically inhibits an enzyme that is essential to plant growth; this enzyme is not found in humans or animals, contributing to the low risk to human and animal health when using glyphosate-based products according to label directions. It also is able to be applied with a low chance of harming non-target plants, as it has low volatility and binds tightly to most soils.

Agricultural systems in the US have evolved over the last 20 years to become more productive and environmentally sustainable. Glyphosate has allowed farmers to increase the incorporation of more sustainable practices into production, including no-till and conservation tillage systems. Reducing tillage has enormous benefits, such as less soil erosion, improved soil organic matter, less soil compaction, increased soil moisture, cleaner water, reduced energy use, more wildlife habitat, and less greenhouse emissions that contribute to climate change. The principle barrier to reducing or eliminating tillage was the challenge of controlling weeds with available soil-applied herbicides.

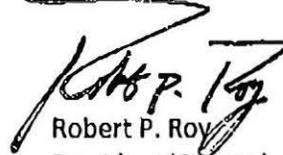
In the state of California, glyphosate-based herbicides have been a valuable tool for weed control for farmers and other users (e.g., landscaping and lawn care professionals, foresters, etc.) for more than 40 years. It provides excellent, cost-effective, broad-spectrum weed control and is labeled for use in more than 250 crops in California. Further, it doesn't have the restrictions that many substitute herbicide products may have. Globally, the overall safety profile has contributed to the adoption of glyphosate-based herbicides in more than 160 countries.

In conclusion, IARC's classification should not be used by OEHHA to list glyphosate under Prop 65, because the classification does not establish a link between glyphosate and an increase in cancer, and the conclusion conflicts with the overwhelming consensus of regulatory authorities around the world. General actions against herbicides, such as glyphosate, would have significant impacts on agriculture production systems and productivity goals, which would

¹ Statement of Carlissa Cyran, Chemical review manager for the Office of Pesticide Programs at EPA (2015). <http://www.croplife.com/ed/torial/epa-plans-response-to-larc-glyphosate-finding-but-not-just-yet/>.

result in economic and environmental costs to farmers and society domestically and internationally. As the unified voice of California's agriculture industry, we urge you to scrutinize IARC's report, weigh the opinions of regulatory bodies worldwide and not list glyphosate under Prop 65.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert P. Roy". The signature is stylized with a large, sweeping initial "R" and a long horizontal stroke extending to the right.

Robert P. Roy
President/General

RPR/le