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[P65Public.Comments@oehha.ca.gov](mailto:P65Public.Comments@oehha.ca.gov) with "NOIL Glyphosate"

To Whom it May Concern:

This letter is in reference to OEHHA intention to add glyphosate to Prop 65 List

I am a Cooperative Extension Specialist in the Department of Plant Sciences at the University of California, Davis, a position I have held since 2009. The primary focus area for my statewide research and extension program is orchard and vineyard weed control, herbicide-resistant weeds, and herbicide-related crop safety research and training. Prior to joining the faculty at UC Davis, I was employed for four years as a USDA-ARS Research Agronomist in Parlier, CA where my work focused on weed and nematode control with fumigant alternatives to methyl bromide for tree/vine/rose nurseries and perennial crop production systems. Throughout my undergraduate, graduate and postgraduate training and my professional career, I have focused on helping growers and land managers deal with problem weeds using economically and environmentally sound practices.

I understand that OEHHA has announced an intention to add glyphosate to the Proposition 65 list in the state. I strongly urge that this decision not be made hastily due to the economic importance of the herbicide and because the body of evidence supporting this decision is not based on new research but rather on the 2015 International Agency for Research on Cancer (IARC) decision to classify the compound as "2A, possibly carcinogenic to humans".

Glyphosate is the most widely used and economically important herbicide in the world. It is a broad spectrum herbicide that controls many grass and broadleaf weeds after they emerge. Importantly, it is well translocated in plants, which means it is able to move beyond the parts of the plant directly sprayed, including roots and below-ground structures. This makes it one of the relatively few herbicides with good activity on some of our most challenging perennial herbaceous and woody weeds. It is difficult to overstate the importance of glyphosate-based herbicides for weed management in many California crop and non-crop situations.

It has a multitude of use patterns. In the tree and vine crops that I work in, it is used as a directed spray below the tree canopy to control weedy vegetation on the orchard floor. In many annual fruit, vegetable, and grain crops, it is used either before crop planting or emergence, or after harvest to control late emerging weeds. In genetically engineered "Roundup Ready" crops, this normally non-selective herbicide can be used selectively to control weeds during the cropping season. Homeowners and wildland weed managers use it as "spot" applications to control individual weeds or small patches. It can be applied in forestry situations to control perennial woody trees and shrubs. There are well over 100 individual herbicide products registered in the state with the glyphosate as an active ingredient. I am not a toxicologist so I'm not qualified to evaluate the data underlying the IARC designation. However, it is my understanding that IARC evaluated the same studies that numerous other regulatory agencies, including US-EPA, evaluated when putting this herbicide in a much more favorable hazard class.

I believe that OEHHA should base a decision to include such an important herbicide on the Prop 65 list on the best, and most current research on the toxicity and carcinogenicity rather than relying only on the IARC designation.

I'm afraid that some of the conversation in the public sphere about glyphosate safety is really an attack on genetically modified crops (many crops are engineered to be glyphosate-tolerant). While the GMO issue is certainly a legitimate conversation to have as a society, I would hate to see this important herbicide lost to growers who grow conventional crops or use the herbicide in non-crop and home situations. I strongly encourage that any decision by OEHHA affecting glyphosate status in California be based on the scientific evidence. Given that this herbicide has been registered in the US and around the world since the 1970s, there should be an enormous amount of direct evidence and cross-sectional data to help determine if this is a real health risk to Californians.

As someone who works daily with herbicides, both in the laboratory and the field, I am very interested in knowing and understanding the long and short term effects of glyphosate on humans. However, I am also greatly concerned that a very important weed management tool could be mislabeled as a known carcinogen and be made unavailable to weed managers in California who are unable to use materials on the Prop 65 list.

To summarize, glyphosate is a very important integrated weed management tool used widely in crop and non crop situations by farmers, agencies, and homeowners in California. The IARC decision to list glyphosate as a probable human carcinogen was based on the same evidence that many other agencies used to come to the opposite conclusion. Because the stakes are so high for California weed managers if this effective, economical, and broad spectrum herbicide were to be placed on the Prop 65 list, I strongly encourage OEHHA to base their decision on scientific evidence and review rather than solely on the IARC designation.

Thank you for considering these comments offered from my perspective as a Ph.D. weed scientist, herbicide efficacy and crop safety researcher, UC Cooperative Extension Specialist, and Californian.

Best regards,

*Brad*

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