

From: Cheryl Wilen <cawilen@yahoo.com>
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To: P65Public Comments
Subject: NOIL Glyphosate

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To whom it may concerned,

It is with great surprise that the Office of Environmental Health Hazard Assessment plans to list glyphosate as a chemical "identified in the table below as **known** to the state to cause cancer..." There are numerous studies that report that glyphosate is not implicated as a carcinogen. I list some of them below.

As I am sure you know, it is very hard, or even nearly impossible to prove a negative, i.e., it is more difficult to show that something does not cause cancer than it is to show something causes cancer. Nevertheless, the peer-reviewed scientific papers listed in this letter do an excellent job of reviewing current literature or evaluating responses to glyphosate over a long period with an adequate sample size that the results statistically show that no association between exposure to glyphosate and cancer incidence. The choice to list glyphosate as a Prop. 65 chemical is wrong and in direct opposition to what research shows. Listing glyphosate as a Prop. 65 chemical is equivalent to acknowledging that vaccinating children causes autism or that climate change is not real despite overwhelming evidence to the contrary.

Sincerely,
Cheryl A. Wilen, Ph.D.

Epidemiologic studies of glyphosate and cancer: A review Pamela J. Mink , Jack S. Mandle , Bonnielin K. Scurman , Jessica I. Lundin Regulatory Toxicology and Pharmacology. Volume 63, Issue 3, August 2012, Pages 440–452.

Evaluation of carcinogenic potential of the herbicide glyphosate, drawing on tumor incidence data from fourteen chronic/carcinogenicity rodent studies. Helmut Greima, David Saltmirasbf, Volker Mostertde & Christian Struppccf. Critical Reviews in Toxicology, Volume 45, Issue 3, 2015 pp. 185-208.

Cancer Incidence among Glyphosate-Exposed Pesticide Applicators in the Agricultural Health Study

Anneclaire J. De Roos, Aaron Blair, Jennifer A. Rusiecki, Jane A. Hoppin, Megan Svec, Mustafa Dosemeci, Dale P. Sandler and Michael C. Alavanja Environmental Health Perspectives, Vol. 113, No. 1 (Jan., 2005), pp. 49-54.

Epidemiologic studies of glyphosate and non-cancer health outcomes: a review. Mink PJ1, Mandel JS, Lundin JI, Scurman BK. Regul Toxicol Pharmacol. 2011 Nov; 61(2):172-84.

Safety evaluation and risk assessment of the herbicide Roundup and its active ingredient, glyphosate, for humans. Williams GM, Kroes R, Munro I. Regul Toxicol Pharmacol. 2000 Apr; 31(2 Pt 1):117-65.

Multiple myeloma and glyphosate use: a re-analysis of US Agricultural Health Study (AHS) data. Sorahan T. Int J Environ Res Public Health. 2015 Jan 28; 12(2):1548-59.

Cancer incidence among glyphosate-exposed pesticide applicators in the Agricultural Health Study. De Roos AJ, Blair A, Rusiecki JA, Hoppin JA, Svec M, Dosemeci M, Sandler DP, Alavanja MC. Environ Health Perspect. 2005 Jan; 113(1):49-54.

Greim, H., D. Saltmiras, V. Mostert, and C. Strupp (2015). Evaluation of carcinogenic potential of the herbicide glyphosate, drawing on tumor incidence data from fourteen chronic/carcinogenicity rodent studies. Crit. Rev. Toxicol. <http://informahealthcare.com/doi/abs/10.3109/10408444.2014.1003423>