

**From:** [Clyde Elmore](#)  
**To:** [P65Public Comments](#)  
**Subject:** Regarding: NOIL Glyphosate  
**Date:** Tuesday, October 20, 2015 2:42:00 PM  
**Attachments:** [Glyphoste Prop65.docx](#)

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Please find attached comments on this subject. I hope you will find these comments helpful and remind yourself that these come from a researcher and teacher that worked with glyphosate and its many combinations at the University of California, Davis for many years. It is astounding that the IARC could come to this conclusion with the many other data sets that found glyphosate to not be carcinogenic!

Please the whole package of data that is present in the USA and European Union (including EPA and a new publication for the EU) which would disagree with the IARC proposal.

Who would benefit from the addition of glyphosate to the Prop 65 list?

Who would be harmed by the addition of glyphosate to the Prop 65 List?

Lets take some time and wait until the EPA finishes its new review!

Sincerely,

Dr. Clyde L. Elmore

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Ms. Easter Barajas-Ochoa, Office of Environmental Health Hazard Assessment  
P.O. Box 4010, MS198  
Sacramento, California 95812-4010

October 19, 2015

Regarding: NOIL Glyphosate

Ms. Barajas-Ochoa

Please accept these comments from myself, not as a member of some organization. I do not have an economic interest, or wish to lobby to get rid of the use of this chemical.

I am a person that is familiar with glyphosate and some of its formulations. I have worked with this compound as a formulated herbicide and used with or without additives. I have conducted greenhouse and field research with this product (starting as a number compound) in the following crops in California, over many years; tree fruits, nuts, vineyards, ornamentals, turf grasses, landscapes, non-cropland, and Christmas trees. I was working as a Weed Specialist in the Botany Department and later in the Plant Science Department in Weed Science at the University of California, Davis.

After many years of research studies, numbering some 800 studies including company and independent, academic researchers, these data have indicated that glyphosate was not a carcinogen. Because of these studies, EPA has placed glyphosate in its most favorable category for carcinogenicity. Why now do we have one "group-IARC" saying that it is a "probable" carcinogen and California wants to change the whole world?

I am neither a chemist nor a bench scientist, but I would have many questions about the conclusion that has been reached by the International Agency for Research on Cancer (IARC). Have they reviewed the methods of the studies? Have they reviewed studies that indicated that glyphosate was not a carcinogen? Were the methods compared? Did these studies use a pure glyphosate sample(s) or were any of the research studies used with additives? What was the source of the glyphosate? (There surely are many sources now that the chemical is off patent). Did it come from China, India, or some third world country where there could be contaminants? What has happened in CalEPA studies and data bank? Have there been any studies or information in California showing carcinogenicity?

My understanding is that EPA is conducting another review of glyphosate. What is the rush to get this on the California Prop65 list? Wait until EPA follows through with their report. They may actually duplicate the multi-year assessment that was completed on behalf of the regulatory authority in the European Union showing glyphosate was not carcinogenic.

Who will benefit and who will be harmed if California places glyphosate on the Prop 65 list? I'm not sure who will benefit but I know many that will be harmed in their weed management programs. All IPM programs that include glyphosate will, have to be altered and many will lose the ability to manage weeds and other pests because of these program changes. Many turf grass and landscape management businesses and end users (homeowners, schools, parks city parks and recreation managers, farmers of all crops and many others) will be harmed. Many municipalities prohibit the use of Prop 65 listed chemicals. How else will they be able to control invasive plants (weeds)?

Glyphosate-based herbicides have a long history of safe use. The more toxic part of a formulated product to humans and other warm blooded animals are the adjuvants or surfactants that may produce rashes or eye reactions.

A distinct advantage of this chemistry is that the herbicide does not move in most soils, unless they are pure sand to any degree. This is helpful to not to have to worry about leaching into ground water. Some formulations can even be used around water.

Do not place glyphosate on the Prop 65 list. Conduct a review of all the data including the quality of the study(ies) that suggest carcinogenicity. Find out all the information and make a decision with all the data, not a decision from a limited, selected, data review!

Sincerely,

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