

September 29, 2015

Ms. Esther Barajas-Ochoa
Office of Environmental Health Hazard Assessment
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Regarding: NOIL Glyphosate

Ms. Barajas-Ochoa:

Thank you for accepting these comments from California's industrial, turf and ornamental (IT&O) industry 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).

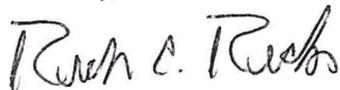
- For more than 40 years, glyphosate-based herbicides have been a valuable tool for weed control for landscaping and lawn care professionals, farmers, and other users in California. All labeled uses of glyphosate are safe for human health and the environment and supported by one of the most extensive worldwide human health databases ever compiled on an agricultural product. Our goal is to ensure that any potential listing will not affect the availability of glyphosate in California.
- No regulatory agency in the world considers glyphosate to be a carcinogen. Regulatory agencies around the world have concluded that all labeled uses of glyphosate are safe for human health and the environment. In the United States, the 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.
- As it has with hundreds of other substances over the years, including aloe vera, the California OEHHA recently announced its intention to list glyphosate under the strict provisions of Proposition 65.
- The sole basis of OEHHA's intention to list is the classification of glyphosate earlier this year by the International Agency for Research of Cancer (IARC). OEHHA interprets Prop 65 to allow it to simply accept the IARC classification without further scrutiny or review. OEHHA does not evaluate the weight or quality of the evidence considered by IARC.
- Monsanto and others in the industry strongly disagree with the IARC classification. The IARC classification overlooked decades of thorough and robust analysis by regulatory agencies, including a multi-year assessment just completed on behalf of the regulatory authority in the European Union. Another registration review is currently underway by the U. S. EPA. The IARC classification 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 regulatory agencies.

- For more information about glyphosate safety, please visit monsanto.com/glyphosate.

As an industry, we support all of the safe and labeled uses of glyphosate in agriculture and the industrial, turf and ornamental business, and we strongly disagree with OEHHA's intention to list glyphosate under Prop 65.

Sincerely,

A handwritten signature in black ink that reads "Rich C. Records". The signature is written in a cursive, slightly slanted style.

Rich C Records
President