

October 6, 2015

Ms. Esther Barajas-Ochoa
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Dear Ms. Barajas-Ochoa,

I would like you to make sure to protect our children and have Glyphosate labeled as a known carcinogen. This stuff is banned in 26 countries and for some reason it is allowed to have billions of pounds a year sprayed when the medical professionals and studies are linking it to terrible health consequences in our children.

One in every three children in California are born with a serious health issue. It is a very sad state of affairs that we have the highest pediatric cancer rate and autism on such a rise of 120% increase in the last 10 years. We must stop looking for the cure to cancer and start focusing on what causes it. To spray a known carcinogen without any warning or notice and then to wonder why we are all so sick is CRAZY! We are disappointed that the government has been so slow to take any action and applaud you for finally addressing this important health issue.

Recently very alarming research and conclusions in reputable publications and organizations in the US and around the world have determined that Glyphosate which is the main ingredient in RoundUp, Ranger Pro and other pesticides, the chemical that is sprayed throughout our cities, parks, schools, neighborhoods, freeways have very harmful detrimental health effects including cancer, lymphoma, autism, and Parkinson's Disease.

Glyphosate is made by Monsanto and Monsanto is also the creator of Agent Orange and DDT both of which were presumed to be safe for quite some time until it was noticed the ill effects these chemicals were having on health and the environment. Glyphosate is turning out to make DDT and Agent Orange look like kool aid and it is imperative that we cease using such harmful toxins for weed control. Killing a weed is not worth the health crisis our children are experiencing.

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Studies from the American Association of Pediatrics have shown great harm from exposure to Glyphosate in children in the US. Children and adolescents are especially at risk given their less developed immune and reproductive systems.

Just 7 weeks ago in a report issued after its March meeting, the World Health Organization said Glyphosate, is "a probable carcinogen to humans" and "stated that there is some evidence linking Glyphosate to non-Hodgkin lymphoma as well.

Additionally, Glyphosate has been found in breast milk in the women in the US in levels that are of great concern and well over the toxicity level that is considered safe or healthy to both the mother and child.

There are many research studies and findings from senior scientists from the EPA, FDA, USDA, and MIT, as pediatricians specializing in children with chronic health issues explaining the dangers of Glyphosate and other chemicals present in these products. Please take some time to review the data.

I am asking that you call it for what it is so precautions for our children can be taken by the people who spray this to protect them and our children.

Please label this harmful nonsense for what it is so people can use caution. In all honesty I wish the California legislature would ban it all together.

Here are some pertinent pieces of information for you to consider as well. A letter from a plant expert we have sought information from on Glyphosate that is sprayed in our parks and schools ⑧.

You are correct in having serious health concerns with the use of glyphosate based herbicides (GBH)! I will respond to the environmental and health consultants comments more specifically, but would emphasize the following general concerns with the use of this high exposure, systemic, water soluble, persistent and bioaccumulative pesticide around children and young adults especially under the age of 25 because of its documented carcinogenicity, endocrine hormone disruption, antibiotic activity (against soil, environment and gut microbiome organisms essential for nutrition, neurological function and immunity), and mineral chelater action.

Although the consultants state in their cover letter that “Glyphosate is not considered a carcinogen by multiple national and international organizations that classify carcinogens,” the January 12, 2015 letter from the consultants to IUSD is now apparently out dated and invalid with the scientific and World Health Organization’s classifications of GBH as a category 2A human carcinogen [*The International Agency for Research on Cancer (IARC)*]. This classification is consistent with the Center for Disease Control epidemiological data for numerous cancers and other emerging “modern” diseases reaching pandemic proportions relative to USDA data on GBH usage (Swanson et al, 2015; NCI annual report).

The permitted access to treated areas 72 hours after application grossly underestimates the exposure potential of children to this carcinogen and endocrine disrupting chemical. The Israeli label for GBH lists a three week period before it is safe to plant after a ‘burn-down’ application of GBH because there can still be active, non-chelated chemical available for exposure. End stage kidney failure in Sri Lanka and Central America is considered problematic from exposure to the glyphosate chelation of minerals which disrupt kidney function when GBH is used as a ‘ripening’ agent for rice or sugar cane (application is typically much more than 72 hours before access to the treated areas!). GBH are bioaccumulative in the body and persistence can be for many years in soil (Monsanto has been accused of false advertising for claiming biodegradation in two separate court decisions).

Alternative, safer procedures are available for school grounds maintenance, and exposure to GBH should be totally avoided in a school setting because of the vulnerability of school-age children and young adults to the many health ramifications from exposure to GBH – carcinogenicity and endocrine hormone disruption being just two considerations. Posting and record keeping will not prevent drift (12-16 %), exposure to dust, and other inadvertent contact. They will help document liability for the numerous health related problems now being associated with GBH.

I will briefly respond to the Q & A items below:

Q1. Although many of the safety studies are based on technical grade glyphosate, the formulated GBH is 100 to 1000 times more toxic than the cited ‘active’ ingredient. The recent book by Attorney Steven Druker (*Altered Genes, Twisted Truth*) documents the fraud associated with the

safety and registration process for GBH as does the very thorough review by Antoniou (GMO Myths and Truths, 2nd Edition).

Q2. Exposure of children is also by inhalation (of drift and dust) and dermal exposure since GBH are not readily chelated or degraded and are highly water soluble, persistent, systemic compounds.

Q3. As already discussed above, the 72 hour restriction is grossly inadequate considering the unique characteristics of GBH as mineral chelaters, carcinogens, endocrine hormone disrupters, enzyme inhibitors (over 291 enzymes known to be down regulated), and patented broad-spectrum antibiotics in potential contact with a unique class of highly susceptible, developmentally formative individuals to the action of GBH.

Q4. Children are not wearing personal protective clothing when they are breathing suspended GBH from drift and/or dust during or days after application or when exposed while playing to GBH-containing soil and materials exposed directly or inadvertently through dust or drift.

Q5. There is adequate evidence for GBH to be classified as Category 2A Probable Human Carcinogen by the IARC of WHO and as an endocrine disrupting hormone by the Endocrine Society. It is correlated with numerous other diseases based on CDC and USDA data (Swanson et al, 2015), and is a patented antibiotic against critically essential components of the human microbiome essential for nutrition, neurological function and immunity.

Q6. This statement is now out-dated with the IARC classification as a Category 2A human carcinogen, and documented animal carcinogen.

Q7. EPA and FDA both have stated that they do no independent testing of the safety and rely solely on the statements of the manufacturers that the products are safe. I believe that Attorney Steven Druker has amply documented the corruption and fraud of this system in his recent book *Altered Genes, Twisted Truth*.

Q8. See Druker's book. These levels were established years ago and have not been updated with more recent scientific data showing toxicology at as low as 0.1 PPB. The May 2014 increase in permitted residue levels were not based on toxicology as much as on levels currently found. Again,

formulations and chemical mixtures can increase toxicity over 1000 fold beyond the 'active' ingredient tested!

Q9. With the current scientific data showing toxicological ramifications at levels below 0.1 PPB, and a highly susceptible Group, **any** exposure should be avoided for this age group. It is unimaginable to even consider chronic exposure to **any** of this environmentally persistent and bioaccumulative chemical. The assumptions on exposure levels provided are pure speculation since there is not a data-base without testing. Dr. Charles Benbrook, Washington State University (M2M program) has listed a Dietary Risk Index for glyphosate of 82.7 compared with the Neonicotinoid insecticides of 14.9 and all other pesticides at less than 1. There is no room for additional with an already grossly excess exposure!

Q10-11. There are alternative means of grounds management. IPM doesn't mean inclusion of the use of such systemic, persistent, water soluble, bioaccumulating, broad-spectrum, health damaging chemicals. There are additional approaches and materials besides vinegar also. The rapidly developing list of weeds resistant to GBH also is increasing their volume used and nullifying their benefit for grounds maintenance.

Q12. A full disclosure of 'inert' ingredients (formulation products to enhance toxicity, penetration, persistence, etc.) must be available for each product since these have been scientifically shown to be up to 1000 times more toxic (health factor) than the 'active' ingredient (herbicidal activity) in the case of GBH.

Additionally, here is a list non conclusive by any means of the harm happening to our children with Glyphosate to their brains and bodies.

Report: Pesticide exposure linked to childhood cancer and lower IQ (CNN - Sept 14, 2015) <http://www.cnn.com/2015/09/14/health/pesticide-exposure-childhood-cancer/index.html>

Monsantos secret roundup and birth defects report

<http://www.scribd.com/doc/87063060/Monsanto-s-Secret-Roundup-and-Birth-Defects-Report>

State probe of Portland bee deaths finds lethal dose of banned

chemical http://www.oregonlive.com/environment/index.ssf/2015/07/state_prob_of_portland_bee_dea.html#incart_2box_oregonian_monster

Weedkiller suspected of causing cancer deemed 'safe' (based largely on classified industry reports) <http://www.theguardian.com/environment/2015/jul/15/weedkiller-suspected-of-causing-cancer-deemed-safe>

African Centre for Biodiversity - latest study - What next after the ban of glyphosate

<http://acbio.org.za/wp-content/uploads/2015/06/Glyphosate-report-2015.pdf>

***Settlement: EPA to Analyze Impacts of World's Two Most Widely Used Pesticides on**

1,500 Endangered Species (Historic Settlement Means Harms of Atrazine, Roundup Will Be Assessed) http://www.biologicaldiversity.org/news/press_releases/2015/pesticides-06-23-2015.html

***Failure to Regulate: Pesticide Data Fraud Comes Home to Roost** (by Carol Van Strum) - 09 April 2015 <http://www.truth-out.org/news/item/30097-failure-to-regulate-pesticide-data-fraud-comes-home-to-roost>

***New evidence of pesticides in Calgary air, soil** (news article and video) - June 10, 2015

<http://calgary.ctvnews.ca/new-evidence-of-pesticides-in-calgary-air-soil-1.2416556>

***France Bans Sales of Monsanto's Roundup in Garden Centers, 3 Months After U.N. Calls It 'Probable Carcinogen'** (6/15/15) <http://www.newsweek.com/france-bans-sale-monsantos-roundup-garden-centers-after-un-names-it-probable-343311>

***Say "yes" or say "no": court tells US EPA It must decide on petition to ban hazardous pesticide** (June 11, 2015) - chlorpyrifos

http://switchboard.nrdc.org/blogs/vsingla/say_yes_or_say_no_court_tells_.html

***Edmonton close to a ban on cosmetic herbicides** (JUNE 11, 2015)

<http://www.edmontonjournal.com/Edmonton+close+cosmetic+herbicides/11126192/story.html>

***Agribusiness nervous as WHO cancer unit analyzes popular pesticide - May 29, 2015** (Twenty-four scientists representing WHO's International Agency for Research on Cancer (IARC) are set to analyze scientific findings regarding links between cancer in humans and the herbicide known as 2,4-D at a June 2-9 meeting in Lyon, France.) <http://www.reuters.com/article/2015/05/29/who-pesticide-idUSL1N0YJ0W920150529>

***Bee Die-Offs Are Worst Where Pesticide Use Is Heaviest** (May 14, 2015)

<http://www.motherjones.com/tom-philpott/2015/05/40-percent-us-honeybees-died-over-past-year>

***U.S. EPA proposing temporary pesticide-free zones for honeybees**

<http://www.reuters.com/article/2015/05/28/us-epa-agriculture-honeybees-idUSKBN0OD1P620150528>

***Trading Health for Small Conveniences?** (01 May 2015) <http://greensciencepolicy.org/trading-health-for-small-conveniences/>

***WHAT ARE WE DOING TO OUR CHILDREN'S BRAINS? - Environmental chemicals are wreaking havoc to last a lifetime** (by Elizabeth Grossman) - February 16, 2015: <http://ensia.com/features/what-are-we-doing-to-our-childrens-brains/>

***The coming food disaster (OPINION - Dave R. Schubert, Professor and Laboratory Head, Cellular Neurobiology Laboratory, Salk Institute for Biological Studies)**
<http://www.cnn.com/2015/01/27/opinion/schubert-herbicides-crops/index.html>

***Montgomery (County, MD) Council members Berliner, Leventhal Ask County Hospitals to Ban Use of Pesticides on Their Grounds** (press release and text of letter; release date: 5/11/2015)
<http://safegrowmontgomery.org/Publications/montgomery-councilmembers-berliner-leventhal-ask-county-hospitals-to-ban-use-of-pesticides-on-their-grounds/>

***Montgomery MD Councilmembers Ask County Hospitals to Ban Landscape Pesticides** <http://www.beyondpesticides.org/dailynewsblog/?p=15632>

***Monsanto Herbicide Faces Global Fallout After WHO Labels It a Probable Carcinogen**

<http://www.alternet.org/environment/monsanto-herbicide-faces-global-fallout-after-world-health-organization-labels-it>

***Ruthless Power and Deleterious Politics: From DDT to Roundup**

<http://www.independentsciencenews.org/environment/ruthless-power-and-deleterious-politics-from-ddt-to-roundup/>

Chemical Exposure Linked to Billions in Health Care Costs

<http://news.nationalgeographic.com/news/2015/03/150305-chemicals-endocrine-disruptors-diabetes-toxic-environment-ngfood/#.Vct-C0QnwSp.twitter>

Thank you

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