

From: [Alejandro Valadez](#)
To: [P65Public Comments](#)
Subject: NOIL - Glyphosate, Tetrachlorvinphos, Parathion, Malathion: YES - Add to Prop 65 List
Date: Tuesday, September 22, 2015 11:18:49 AM

Dear Ms. Barajas-Ochoa:

I (my organization) strongly support OEHHA's Notice of Intent Letter (NOIL) to add Glyphosate (both an antibiotic and an herbicide) and Malathion as Group 2A (probable carcinogen to humans), and Tetrachlorvinphos and parathion as Group 2B (possible carcinogen to humans) to California's Proposition 65 list.

The March 2015 finding by the World Health Organization's International Agency for Research on Cancer (IARC) that Glyphosate is a probable carcinogen to humans is validated by overwhelming scientific evidence of Glyphosate toxicity across the globe. IARC also concludes there is sufficient evidence of carcinogenicity of these four chemicals in experimental animals. According to IARC report author, Professor Christopher Portier, "Glyphosate is definitely genotoxic. There is no doubt in my mind."

Since its introduction in the marketplace in 1974, Glyphosate rapidly became the world's most popular herbicide, with accelerated expansion of its use following introduction of genetically modified, glyphosate-tolerant crops in the 1990s. According to latest estimates, 85% of GM crops are herbicide tolerant, with glyphosate-tolerant crops comprising a majority of those planted. As of May 2015 a total of 137 glyphosate-tolerant varieties have been approved, including cotton, soybean, and maize, wheat, sugar beet, potato, Polish canola and more.

According to the International Service for the Acquisition of Agri-Biotech Applications (ISAAA), "18 million farmers in 28 countries planted more than 181 million hectares of GM crops in 2014, up from 175 million hectares of GM crops in 27 countries in 2013."

Globally, Glyphosate is a key ingredient in more than 700 products and is also used to control weeds in gardens, along roadsides, on schoolyards, in commercial and residential areas and on millions of acres of farmland. In recent years, Glyphosate-resistant weeds, known as, "Super Weeds", have become prevalent causing crop losses while extracting excessive water and nutrients from soils. Additionally, the U.S. Geological Survey (USGS) routinely finds glyphosate in U.S. waterways, especially in the Midwestern states and the Mississippi River Valley.[i]

The repeated industry claim that Glyphosate has no negative health effects on humans has allowed this toxin to poison our soil, water air and food, even though existing evidence has revealed both carcinogenicity and teratogenicity as far back as the 1980s. This has been hidden by industry fraud with support of government bodies, as we watch the health of our nation decline in direct correlation with the spike in its use. This is a crime of omission against humanity.

With Glyphosate's increasing lack of efficacy, coupled with rising awareness of its toxicity, people and nations across the globe are taking action to rid Glyphosate from their farms, their food and their land, air and water.

Thank you for recognizing the long overdue urgency to mandate to add this deadly chemical to the Prop 65 statewide list. Thank you, at the Office of Environmental Health Hazard Assessment for your integrity in giving credence to the overwhelming evidence of glyphosate toxicity now being brought to light across the globe, with ever-accelerating, alarming reports of steep rises in cancer, birth defects and other serious illnesses, as use of glyphosate and the three other above-named chemicals increases.

Sincerely,
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