

## Ramirez, Michelle@OEHHA

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**From:** Thomas J Getts <tjgetts@ucanr.edu>  
**Sent:** Monday, September 14, 2015 9:40 AM  
**To:** P65Public Comments  
**Subject:** NOIL-Glyphosate\*, Malathion, Parathion,Tetrachlorvinphos

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Dear OEHHA,

I find it interesting that you are listing the four chemicals under prop 65. Two of these chemicals have been found to be probably carcinogenic, and two have been found to be possibly carcinogenic. It seems like a leap to take a possible or probable listing and say it is for sure a carcinogenic compound.

I am also curious why you are seeking public comment on listing when you state "OEHHA cannot consider scientific arguments concerning the weight or quality of the evidence considered by IARC". The IARC report was the only source of information you list for making this designation. So shouldn't you be seeking comment on the literature used by the IARC to come up with these designations? Because without taking comments on the scientific validity of these claims, what basis would there be for comment either in support of disagreement with the listing? All comments would just be unfounded opinions.... I would love to bring up some of the questions that have been brought to light about how the literature used by the IARC to make some of these designations, but those comments would be ignored.

Since the report has come out, there has been skepticism from a fairly large portion of the scientific community about the report released by the IARC in particular when concerning Glyphosate. Currently the BFR in Germany is reviewing the report, to seek a second opinion on its claims. Also another registration review is currently being conducted by the US EPA. Personally I would like to see what these other two organizations have to say before it is listed as a known carcinogenic compound by California.  
Tom

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