

From: [William Brooks](#)
To: [P65Public Comments](#)
Subject: NOIL - Glyphosate, Tetrachlorvinphos, Parathion, Malathion: YES- Add to Prop 65 List
Date: Monday, September 21, 2015 8:44:04 AM

September 20, 2016

Ms. Esther Barajas-Ochoa
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**RE NOIL: GLYPHOSATE, TETRACHLORVINPHOS, PARATHION,
MALATHION**

Dear Ms. Barajas-Ochoa:

I strongly support OEHHA's Notice of Intent Letter (NOIL) to add Glyphosate (an endocrine disruptor, chelator and 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 World Health Organization's International Agency for Research on Cancer (IARC) concluded there is sufficient evidence of carcinogenicity of these four chemicals in experimental animals.

In the March 2015 finding, the IARC concluded that Glyphosate is a probable carcinogen to humans, which is validated by overwhelming scientific evidence of Glyphosate toxicity across the globe. As a result it is currently banned in Netherlands, France, Columbia, El Salvador, Burmuda, Hungary, and is under review for banning in Germany, Brazil, Argentina, Peru, Russia, & China.

The NCBI (US National library of Medicine National Institutes of Health) ncbi.nlm.nih.gov, has many research papers, that show health issues with glyphosate. There appears to be connections with * mitochondrial toxicity, * endoplasmic reticulum stress, and * other health issues", with this chemical. This seems to be an even bigger problem with the increase toxic effects of the added surfactants in "Round Up", "Extend" and "Enlist Duo". (Please look up "glyphosate human toxicity", at ncbi.nlm.nih.gov)

I'm particularly concerned with both the links between Autism, and of Non-Hodkin Lymphoma and this chemical:

<http://www.ncbi.nlm.nih.gov/pmc/articles/PMC4025008/> has

>>Non-Hodgkin Lymphoma and Occupational Exposure to Agricultural Pesticide Chemical Groups and Active Ingredients: A Systematic Review and Meta-Analysis, states:

Striking increases in the incidence of non-Hodgkin lymphoma (NHL) cancer have

occurred in the last 30 years:..and B cell lymphoma was positively associated with phenoxy herbicides and the organophosphorus herbicide glyphosate.<<

According to IARC report author, Professor Christopher Portier, "Glyphosate is definitely genotoxic. There is no doubt in my mind."

Sadly overlooked by the supporters of GMO's in USA, is the huge increase in these herbicides that have resulted since their introduction. 527 million pound increase in herbicide use in the United States between 1996 and 2011. With 73% increase in glyphosate in 2013 alone. This has been largely attributed to increased weed resistance.

Moms Across America have taken measurements of glyphosate in mothers. They have show levels 10 times as high as the same studies of mothers in Europe, (and twice as high as legal limits in Europe), in mothers breast milk, placenta, urine, baby food, and even in the hospital feeding liquids for premature babies. Yet the FDA do not even require measuring this in food, claiming it is safe, in contradiction to it's own database.

It is a pity that the Food and Drug Administration (being run by the ex-Monsanto employee Michael Taylor), has the same cosy relationship with these companies, that the tobacco industry used to. I guess as ever, short term company profits supersede long term healthcare costs, for the nation.

Thank you for recognizing the long overdue urgency to mandate and 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,

William Brooks,

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Sacramento,
CA 95821,

[i] "Glyphosate Classified As Carcinogenic by International Cancer Agency, Group Calls on U.S. to End Herbicide Use and Advance Alternatives, Beyond Pesticides, <http://www.beyondpesticides.org/dailynewsblog/2015/03/glyphosate-classified-carcinogenic-by-international-cancer-agency-group-calls-on-u-s-to-end-herbicides-use-and-advance-alternatives/>