From: Bob McFarland
To: P65Public Comments
Subject: Glyphosate NSRL
Date: Wednesday, June 21, 2017 3:44:14 AM
Attachments: 6.20.17CAGUILD.COMMENTLTR RE Bob McFarland GLYPHOSATE FINAL 8pm.doc

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June 20, 2017

RE GLYPHOSATE NSRL: Listing of Glyphosate on Proposition 65 and Proposed NSRL: Comment

To Whom It May Concern:

The California Guild thanks and commends the Office of Environmental Health Hazard Assessment for their action proposing to list glyphosate on California's Proposition 65 list. This action followed the March 2015 finding by The International Agency for Research on Cancer (IARC), with input from four research panels, that glyphosate "is probably carcinogenic to humans (Group 2A)."

The California Guild urges the California Office of Environmental Health Hazard Assessment to consider that there is no (zero) safe level of glyphosate, to replace the currently recommended NSRL of 1100 micrograms per day.

The following are excerpts from several peer reviewed reports containing compelling evidence to demonstrate that severely harmful effects are resulting from ever expanding use of glyphosate (Roundup)<!--[if !supportFootnotes]-->[i]<!--[endif]-->, including severe damage to human and animal health (i.e. autoimmune disease, Type I Diabetes, etc.); loss of environmental integrity; deteriorating soil quality and contamination of air and water. In 2014 the US Geological Survey found the following (see web link below):

*Glyphosate was detected in 59% of surface waters (470 sites sampled)

*Glyphosate was detected in more than 50% of soil and sediment samples, and water samples from ditches and drains, precipitation, large rivers and streams.

*Data from nine surface-water sites sampled repeatedly indicated that glyphosate and AMPA detection frequency, median concentrations, and loads are higher late in the study period (2006-2010) than early (2000-2005).<!--[if !supportFootnotes]-->[ii]<!--[endif]-->

Glyphosate is the most commonly used herbicide across the globe. Its use on core crops in the United States has increased exponentially over the past two decades. The presence of glyphosate is found in our food and our water, our personal environments, our roadways, parks and schoolyards. Recent research published by the European Parliament warns of the very high costs of current levels of exposure to pesticides – especially to children and pregnant women.<!--[if !supportFootnotes]-->[iii]<!--[endif]-->

According to a recent report titled "Glyphosate, Pathways to Modern Disease III"<!--[if !supportFootnotes]-->[iv]<!--[endif]-->, there are multiple pathways through which glyphosate can lead to pathology, including both disruption of the shikimate pathway (present in normal gut bacteria and in plants) and gut bacteria itself. Due to verified shikimate pathway disruption, our gut bacteria are harmed by glyphosate. The shikimate pathway is essential to absorption of amino acids.

On June 4, 2017, *Environmental Health News* reported a new analysis of previously confidential information regarding glyphosate, as requested by the European Parliament, found eight significant increases in tumor incidence in animals exposed to glyphosate not previously reported.<!--[if !supportFootnotes]-->[v]<!--[endif]-->

In November 2016 Food Democracy Now! and The Detox Project announced findings of alarming levels of glyphosate contamination found in popular American foods in a detailed report.<!--[if !supportFootnotes]-->[vi]<!--[endif]--> The Detox Project enables NGOs such as Food Democracy Now!, the Organic Consumers Association and numerous other groups and companies to test food products for glyphosate and AMPA residues using validated Liquid chromatography-tandem mass spectrometry (LC-MS/MS) methods at a third-party FDA registered laboratory in San Francisco (CA) – Anresco Laboratories<!--[if !supportFootnotes]-->[vii]<!--[endif]-->. According to The Detox Project, the current NSRL recommended by OEHHA would not lead to any food products in California being labelled as containing glyphosate, as the NSRL would be above the levels found in all food products<!--[if !supportFootnotes]-->[viii]<!--[endif]--> tested so far.

Glyphosate has been shown to cause human breast cancer cells to proliferate in vitro when they are exposed at levels of 1 part per trillion (1 ppt).<!--[if !supportFootnotes]-->[ix]<!--[endif]--> Lab testing results indicated that low and environmentally relevant concentrations of glyphosate possessed estrogenic activity.

Thank you for considering this critical information regarding known toxicity of glyphosate in your decision regarding an NSRL level for the citizens of California.

Best regards,

Bob McFarland
President
California Guild
916-4-GUILDS (916-448-4537)

NOT AFFILIATED WITH THE CALIFORNIA STATE GRANGE

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<!--[if !supportFootnotes]-->[i]<!--[endif]-->Glyphosate Pathways to Modern Diseases, VI Prions Amyloidosis and autoimmune neurological diseases, Senef,

Stephanie; Samsell, Anthony.
https://www.researchgate.net/publication/316601847_Glyphosate_pathways_to_modern_diseases_VI_Prions_amyloidoses_and_autoimmune_neurological_diseases

<!--[if !supportFootnotes]-->[ii]<!--[endif]--> US Geological Survey, https://toxics.usgs.gov/highlights/2014-04-23-glyphosate_2014.html

<!--[if !supportFootnotes]-->[iii]<!--[endif]--> "Organic Foods Backed by Landmark Report – Warning Pesticides far more dangerous Than Was Thought," The Telegraph, Donnelly, Laura, Health Editor, June 2, 2017, http://www.telegraph.co.uk/news/2017/06/02/organic-foods-baclked-landmark-report-warning-pesticides-far/

<!--[if !supportFootnotes]-->[iv]<!--[endif]--> "Glyphosate: Pathways to modern diseases III, Manganese, Neurological diseases and associated pathologies, Senef, Stephanie; Samsell, Anthony. *Surgical Neurology International*, March 24, 2015
http://surgicalneurologyint.com/surgicalint-articles/glyphosate-pathways-to-modern-diseases-iii-manganese-neurological-diseases-and-associated-pathologies/

<!--[if !supportFootnotes]-->[v]<!--[endif]--> Myers, Pete, *Environmental Health News*, "Incovenient data Buried as Confidential Business Information."
http://www.environmentalhealthnews.org/ehs/news/2017/june/Glyphosate-Science-Monsanto

"Alarming Levels Of Glyphosate Contamination Found In Popular American foods," Food Democracy Now! http://www.fooddemocracynow.org/blog/2016/nov/14,

<!--[if !supportFootnotes]-->[vii]<!--[endif]--> http://anresco.com/

<!--[if !supportFootnotes]-->[viii]<!--[endif]--> https://detoxproject.org/food-testing-results/

<!--[if !supportFootnotes]-->[ix]<!--[endif]--> "Glyphosate Induces human breast cancer cells growth via estrogen receptors," *Food and Chemical Toxicology* 59 (June 2013) pp 129-136. ***El Sevier*****,** Siriporn Thongprakaisang, et al, http://surgicalneurologyint.com/surgicalint-articles/glyphosate-pathways-to-modern-diseases-iii-manganese-neurological-diseases-and-associated-pathologies/