



**A VOICE FOR CHOICE  
ADVOCACY**

**PUBLIC COMMENT ON THE ADDITION OF GLYPHOSATE TO PROP 65**

June 21, 2017

Dear OEHHA and Cal EPA,

A Voice for Choice Advocacy asks for you to make the **No Significant Risk Level (NSRL) for the chemical Glyphosate to ZERO** when adopted into regulation in Title 27, California Code of Regulations, section 25705 (aka Prop 65), **or to ensure the labeling of ALL products containing any amount of Glyphosate so the consumer can make an informed decision when purchasing items to consume.**

Our organization completely supports the addition of Glyphosate to Prop 65, so warning labels can be put on products to warn customers that they may cause cancer, and whether discharges of listed chemicals to sources of drinking water are prohibited. However, we disagree with the proposed 1.1 milligrams of glyphosate per person per day No Significant Risk Level (NSRL) to Glyphosate which OEHHA has proposed. This level is too high and also impossible to implement.

- It is too high because according to a 2016 federal EPA analysis, the typical adult is exposed to 0.09 mg/kg/day of glyphosate per day through diet. “The EPA’s 2012 assessment of glyphosate estimated that American adults could be ingesting more than 5 milligrams of glyphosate every day – five times more than California’s proposed limit. Because data on glyphosate levels on food are very limited, the EPA assessment could be a significant underestimate of real-life exposures... As a result of widespread spraying, glyphosate has now been found to contaminate air, water and soil across vast expanses of the U.S., and also shows up in the food Americans eat every day.” (<http://www.ewg.org/research/california-proposes-safe-level-roundup-more-100-times-lower-epa-limit/other-human-health>) The suggested NSRL of glyphosate has not taken into consideration that glyphosate has been shown to bioaccumulate. So, it is unlikely that the 1.1 mg limit would result in warnings on food or other products, but over time the level in the body would be significantly higher than the 1.1 milligrams of glyphosate per person per day, because of what remains in the body from previous exposure. The bioaccumulation has been shown in the parts per trillion to increase the growth of breast cancer cells and to cause liver disease, which is a precursor to cancer.
- The level also does not account for the difference in size and the vulnerability of a fetus, baby or child’s immune system.



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- The information which OEHHA used to come up with this NSRL also did not take into consideration the lowest levels of the epidemiology studies, which means the code of regulations 25703 was not followed. This code states that an epidemiology study should be included, and the lowest number that showed harm should be used. This was not done as only an animal case was reviewed to determine the NSRL.
- It is impossible to implement because at this time glyphosate is pretty much everywhere in the US food chain, other than organic farms (and even in some of those due to cross contamination). Any individual product may have less than 1.1 mg and so would not be labeled, but the consumer would not know what level it does have and so in a day may be unknowingly consuming a number of items that result in a level above the NSRL. Similarly it would be impossible for a restaurant or other food establishment to comply as they would not know how much each dish would include because the individual products would not be labeled if they were below this amount. Also Prop 65 exempts non-target exposure from farm applications, including aerial sprays and pesticide drift, as well as use on playgrounds, roadsides and forests to which consumers are exposed on a regular basis.

We urge you as the organization that has the power to change the world into a less toxic and less cancerous place to make the **No Significant Risk Level (NSRL) for the chemical Glyphosate to ZERO** when adopted into regulation in Title 27, California Code of Regulations, section 25705 (aka Prop 65). If you do not make it zero, then we ask that you require **the labeling of ALL products, businesses (including farmland) and public spaces (including playgrounds) containing any amount of Glyphosate, so the consumer can make an informed decision and to be able to more accurately determine their daily consumption.**

Thank you for your time and consideration.

Sincerely,

*Christina Hildebrand*

Christina Hildebrand

President, A Voice for Choice Advocacy, Inc.

Giving issues a voice, A Voice for Choice Advocacy advocates for people's rights to be fully informed about the composition, quality, and short- and long-term health effects of all products that go into people's bodies, such as food, water, air, pharmaceuticals and cosmetics.