CENTER for BIOLOGICAL DIVERSITY Because life is good.

November 5, 2026

Attention: Kiana Vaghefi
Office of Environmental Health Hazard Assessment
P. O. Box 4010
Sacramento, California 95812-4010

Re: Letter in support of listing atrazine as chemical known to cause cancer

To Whom it May Concern,

The Center for Biological Diversity (Center) offers strong support for the proposal by the California Office of Environmental Health Hazard Assessment (OEHHA) to list atrazine as known to the state to cause cancer under the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65).

The Center is a non-profit environmental organization with offices in Oakland, CA and elsewhere in the United States dedicated to the protection of diverse native species and their habitats through science, policy, education and law. The Center has over 1.8 million members and online activists throughout the United States, including over 246,500 in California. Recognizing that pesticides are one of the foremost threats to the environment, biodiversity, and public health, the Center works to prevent and reduce the use of harmful pesticides and to promote sound pest management strategies.

Stated in the notice of intent to list is the following: "Health and Safety Code section 25249.8(a) incorporates California Labor Code section 6382(b)(1) into Proposition 65. The law requires that certain substances identified by the International Agency for Research on Cancer (IARC) be listed as known to cause cancer under Proposition 65. Labor Code section 6382(b)(1) refers to substances identified as human or animal carcinogens by IARC. OEHHA has adopted regulations concerning these listings in Title 27, California Code of Regulations (CCR), section 25904. As the lead agency for the implementation of Proposition 65, OEHHA evaluates whether a chemical's listing is required."

Title 27 California Code of Regulations section 25904 states:

"A chemical or substance shall be included on the list if it is classified by the International Agency for Research on Cancer (IARC) in its IARC Monographs series on the Evaluation of

Carcinogenic Risks to Humans (most recent edition), or in its list of Agents Classified by the IARC Monographs, as: (1) Carcinogenic to humans (Group 1), or (2) Probably carcinogenic to humans (Group 2A) with sufficient evidence of carcinogenicity in experimental animals, or (3) Possibly carcinogenic to humans (Group 2B) with sufficient evidence of carcinogenicity in experimental animals. A chemical or substance for which there is less than sufficient evidence of carcinogenicity in experimental animals and classified by IARC in Group 2B shall not be included on the list."

While the full monograph for atrazine has not been published yet. the published conclusions of the meeting for IARC Monographs Volume 140: Atrazine, Alachlor, and Vinclozolin [1] concluded that there was sufficient evidence in experimental animals for the carcinogenicity of atrazine. Specifically, "[a]trazine caused adenocarcinoma of the mammary gland in female Sprague-Dawley rats and adenocarcinoma of the uterus in Fischer 344/LATI rats." [1]

To supplement the animal studies of carcinogenicity, we also note that the IARC found strong evidence in experimental animals that atrazine exhibits many key characteristics of carcinogens, such as inducing oxidative stress and inflammation, suppressing the immune system, abrogating normal hormonal signaling, and altering cell proliferation and cell death. The IARC also found a positive association between atrazine exposure and a specific genetic variant of non-Hodgkin lymphoma (NHL) in humans [1].

The IARCs group 2A finding, together with a finding of sufficient evidence for carcinogenicity in animals and strong mechanistic evidence, is a more than sufficient reason for the state of California to list atrazine as known to the state to cause cancer under the labor code mechanism of Proposition 65.

The Center thanks you for taking this important action to protect people and the environment from this carcinogenic chemical.

Sincerely,

Nathan Donley
Environmental Health Science Director
Center for Biological Diversity
ndonley@biologicaldiversity.org

1. Cattley R, De Roos A, Mandrioli D et al. Carcinogenicity of atrazine, alachlor, and vinclozolin. The Lancet Oncology, 2025; 27, 11-12 Available from: https://pmc.ncbi.nlm.nih.gov/articles/PMC12729129/.