Haitian Lu
Head of CP Regulatory & Stewardship NA

Syngenta Crop Protection, LLC
P.O. Box 18300
Greensboro, NC 27419-8300
www.syngenta.com

Tel 336-314-7086
haitian.lu@syngenta.com



November 9, 2026

Via electronic submission

Attention: Kiana Vaghefi
Office of Environmental Health Hazard Assessment (OEHHA)
1001 I Street
Sacramento, California 95814

Re: **Comments on OEHHA October 9, 2026 NOI to List Atrazine under Proposition 65**

Dear Ms. Vaghefi:

Syngenta Crop Protection, LLC (Syngenta) submits these comments on California OEHHA's October 9, 2026 notice of intent to list atrazine "as known to the state to cause cancer" under Proposition 65 (the NOI).

Preliminary comments:

The NOI states: "Atrazine meets the requirements for listing as known to the state to cause cancer for purposes of Proposition 65 (27 CCR § 25904(b)(1))."

The NOI's reference to 27 CCR § 25904(b)(1) is incorrect. This provision refers to chemicals that have been classified as carcinogenic to humans (Group 1) by the International Agency for Research on Cancer (IARC).

As noted in the NOI, IARC "published on its website a list entitled 'Agents Classified by the IARC Monographs, Volumes 1 – 142'" and that IARC classified atrazine in Group 2A ("probably carcinogenic to humans"). To date, IARC has not yet published the Volume 140 monograph setting forth the full assessment and rationale underlying its classification of atrazine,

Under 27 CCR § 25904(b)(2), the relevant criteria are a Group 2A classification by IARC and sufficient evidence of carcinogenicity in experimental animals.

Further context regarding IARC's review process:

IARC does not conduct safety assessments. The IARC approach to cancer assessment is limited to a "hazard" evaluation - i.e. evaluation of the strength of the evidence for an agent to exhibit a cancer hazard regardless of the levels of exposure at which this may occur. The IARC review process does not assess the agent in question's potency, examine quantitative dose-response relationships, establish safe exposure thresholds for any human population, or undertake quantitative risk characterization. On this basis, IARC's cancer hazard outputs may be misleading and give the impression of a cancer concern where one does not exist in practice.

In order to assign an agent into a group, IARC consider three primary sources of information:

1) Studies of cancer in humans
2) Studies of cancer in experimental animals
3) Mechanistic evidence

IARC's approach to combining the outputs of these three information streams is a simple rubric, a table that includes the three sets of outputs and follows an unnuanced deterministic process to allocate an agent to a cancer grouping. This approach does not consider critical questions such as consistency of effects between information sources, dose and concentration concordance, the temporal progression through stages in the cancer pathway, and does not attempt to allocate any specific toxicological mode of action to putative cancer effects.

The IARC conclusion that there was limited evidence of cancer in humans was based on two studies with insufficient scientific evidence

The conclusion of the IARC review is largely reliant on two studies (Schroeder et al., 2001 and Chiu et al., 2006) reporting potential associations of atrazine exposure with increased risk of t(14;18)-positive non-Hodgkins lymphoma (NHL). These studies show uncertainties in their estimates individually, and in meta-analyses. Chiu et al. assessed the association between t(14;18) NHL and triazines in general, rather than atrazine in particular. IARC assumed that most of this exposure was likely to be related to atrazine, in conflict with significant t(14;18) NHL associations to pesticides or pesticide classes other than atrazine (or triazines) reported in both studies. Other plausible explanations for the observed associations beyond pesticide co-exposures were "ruled out with reasonable confidence" by IARC without sufficient explanation. IARC also did not address the high prevalence of t(14;18) translocations among individuals exposed to pesticides, which indicates that a higher occurrence of t(14;18)-positive NHL could simply be an artifact of it being common in these study populations. It is also worth noting that NHL, including t(14;18) NHL, was assessed by the United States Environmental Protection Agency (US EPA) as part of their comprehensive review of atrazine epidemiology published in 2018.

Standard study interpretation approaches were not followed in IARC's conclusion that there was sufficient evidence for cancer in experimental animals

IARC's interpretation of rodent cancer bioassays failed to account for increases in tumor incidence rates as a result of increased survival in treated groups, rather than from a carcinogenic response to atrazine exposure. Correction for survival rates in analyzing cancer bioassay data is standard practice among regulatory authorities and scientific institutes, and is required by international test guidelines for these studies.

The IARC approach to assessment of cancer mechanism followed a flawed framework with a low threshold for identifying potential effects not supported by science

The mechanistic evaluation conducted by IARC does not follow a robust weight of scientific evidence synthesis but rather relies on the Key Characteristics of Carcinogens (KCC) approach. Unlike more robust regulatory evaluations, such as the International Programme on Chemical Safety Mode of Action framework, the KCC approach is a superficial high-level screening assessment that does not meaningfully assess the consistency of biological pathways leading to cancer.

Conclusion:

Atrazine has been used safely in the United States for more than 60 years and is, in fact, one of the most well-studied pesticides. Syngenta is committed to the safe use of atrazine. Syngenta stands by the comprehensive review undertaken by the US Environmental Protection Agency (EPA) in 2018, which concluded that "*Taking into consideration the recent epidemiology publications since the 2011 SAP, including the strongest evidence derived from AHS, as well as the WOE, the Agency concludes that, while uncertainties remain, the totality of the available evidence does not support an association between atrazine exposure and human cancer.*" (US EPA, 2018).

Any conclusion that atrazine meets the criteria for listing under Proposition 65 as "known to the state to cause cancer" would therefore run contrary to the scientifically well-reasoned and supported conclusion of the US EPA, which was explicitly referenced in a 2023 ground and drinking water assessment conducted by the California Department of Pesticide Registration (Cal DPR), the regulatory agency responsible for the safety of crop protection products in California (Cal DPR, 2023).

For the reasons set forth in this letter, Syngenta respectfully requests that OEHHA correct the subsection citation in the NOI and not list atrazine as "known to the state to cause cancer". If OEHHA proceeds under the Proposition 65 Labor Code mechanism, Syngenta requests that OEHHA make clear that any such listing results from application of that mechanism to IARC's hazard classification and does not reflect an independent OEHHA determination that atrazine poses a cancer risk at actual or registered-use exposure levels.

Sincerely,



Haitian Lu, Ph.D.
Head of CP Regulatory & Stewardship NA

References:

(Cal DPR) California Department of Pesticide Regulation, Human Health Assessment Branch, *Risks from Human Exposure to Atrazine and its Degradates in Groundwater* (July 12, 2023), p. 11.

Dave BJ, Blair A, Gapstur SM, Zahm SH, Weisenburger DD. Agricultural pesticide use and risk of t(14;18)-defined subtypes of non-Hodgkin lymphoma. Blood 2006; 108: 1363–69.

Schroeder JC, Olshan AF, Baric R, et al. Agricultural risk factors for t(14;18) subtypes of non-Hodgkin's lymphoma. Epidemiology, 2001; 12: 701–09.

(US EPA) United States Environmental Protection Agency (2018) Draft Human Health Risk Assessment for Registration Review. EPA-HQ-OPP-2013-0266