

Message

**From:** JENKINS, DANIEL J [AG/1920] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=813004]  
**Sent:** 3/23/2015 2:10:00 PM  
**To:** goodis.michael@epa.gov  
**CC:** Keigwin, Richard [Keigwin.Richard@epa.gov]; Cyran, Carissa [Cyran.Carissa@epa.gov]; rowland.jess@epa.gov; anderson.neil@epa.gov  
**Attachments:** General Comments on Glyphosate and Cancer-NHL.DOCX; Summary Comments on IARC Lancet Oncology Pub.docx; Extended Comments on Animal Carcinogenicity Data.docx; Extended Comments on Exposure Data.docx; Extended Comments on Epidemiology Data.docx; Extended Comments on Genotoxicity and Other Data.docx

Mike:

Per our phone conversation. We hope EPA will correct mistakes or absences of fact with respect to its record on glyphosate (including the 2013 statement and the AHS study) as it relates to carcinogenicity.

### 2009 EPA Glyphosate Reg Review

Carcinogenicity was not identified as a concern in the work plan  
[http://www.epa.gov/oppsrrd1/registration\\_review/glyphosate/](http://www.epa.gov/oppsrrd1/registration_review/glyphosate/)

**2013 Federal Register Notice (FR 25396 Vol. 78, No. 84, Wednesday, May 1, 2013)** Final Rule new tolerances in or on multiple commodities: "EPA has concluded that glyphosate does not pose a cancer risk to humans."

<http://www.gpo.gov/fdsys/pkg/FR-2013-05-01/pdf/2013-10316.pdf>

"For the herbicide **glyphosate**, there was *limited evidence of carcinogenicity* in humans for non-Hodgkin lymphoma. The evidence in humans is from studies of exposures, mostly agricultural, in the USA, Canada, and Sweden published since 2001. In addition, there is convincing evidence that glyphosate also can cause cancer in laboratory animals. On the basis of tumours in mice, the United States Environmental Protection Agency (US EPA) originally classified glyphosate as *possibly carcinogenic to humans* (Group C) in 1985. After a re-evaluation of that mouse study, the US EPA changed its classification to *evidence of non-carcinogenicity in humans* (Group E) in 1991. The US EPA Scientific Advisory Panel noted that the re-evaluated glyphosate results were still significant using two statistical tests recommended in the IARC Preamble. The IARC Working Group that conducted the evaluation considered the significant findings from the US EPA report and several more recent positive results in concluding that there is *sufficient evidence of carcinogenicity* in



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experimental animals. Glyphosate also caused DNA and chromosomal damage in human cells, although it gave negative results in tests using bacteria. One study in community residents reported increases in blood markers of chromosomal damage (micronuclei) after glyphosate formulations were sprayed nearby.”

[http://www.thelancet.com/journals/lanonc/article/PIIS1470-2045\(15\)70134-8/abstract](http://www.thelancet.com/journals/lanonc/article/PIIS1470-2045(15)70134-8/abstract)

<http://www.iarc.fr/en/media-centre/iarcnews/pdf/MonographVolume112.pdf>

Thanks,

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