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Submitter Information

General Comment

My comment concerns the mouse feeding study of glyphosate referred to as "Frenchemie Schwebda 2001" as described in the article doi:10.3109/10408444.2014.1003423.

Even at the lowest dose of 14.5 mg/kg-d, there is a 10% increase in incidence. Performing allometric scaling to get a human equivalent dose, this gives 2 mg/kg-d for a 10% response. High end human exposures, but EPA's own calculations, are in the range of 0.5 mg/kg-d. For a linear dose-response, this corresponds to a 2.5% risk of cancer -- many orders of magnitude higher than the 1e-6 to 1e-4 range that is considered acceptable by EPA. Moreover, even considering a non-linear mode of action (which has not been established, and would need to identify an appropriate precursor effect upon which to base the dose-response assessment), the MOE is only a factor of 4 -- hardly enough to account for human variability and interspecies toxicodynamic differences, let alone the severity of the effect (tumors). Finally, this does not account for the fact that this study was only performed to 18 months, and that many of the animals died before the end of the study (these factors would increase the risk extrapolated to a human lifetime).