From: R MASON [mailto:rosemary.mason01@btinternet.com]
Sent: Tuesday, September 27, 2016 3:40 AM
Subject: Glyphosate is a human carcinogen and a teratogen

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Dear Steven Knott

With regard to Glyphosate Issue Paper: Evaluation of Carcinogenic Potential
https://www.regulations.gov/document?D=EPA-HQ-OPP-2016-0385-0094

I attach a file in which I raise my objections to the re-registration of glyphosate:
Grave Inaccuracies and Omissions in the US EPA Glyphosate Issue Paper.

The paper has all the hallmarks of having been written by the European Glyphosate Task Force. In Europe the German Rapporteur Member State Federal Institute for Risk Assessment (BfR) was so unconvincing in its data for the Renewal Assessment Report (RAR) that the EU Commission received 1.5 million citizen petitions demanding they not approve glyphosate. When it was clear that the Commissioners were secretly planning to re-approve it for 15 years, William Engdahl, veteran US Journalist said:
"The opposition to EU Commission approval of glyphosate has taken on a self-expanding character and that has the agribusiness weed-killer cartel alarmed. The process is exposing to the general public, for the first time in such a clear manner, the degree of corruption in not only Brussels but also in the so-called scientific bodies that advise it on what is safe and what not."

At first the German RMS Legal Department denied that anyone else was involved. On 15/07/2014 Herr König, on behalf of the BfR Justiziariat (Legal Department), said the work on the RAR on glyphosate was "*solely done by the BfR staff members of department no. 6, who are civil servant employees*." Then the cat was out of the bag: the French Press and the President of the German Professional Beekeepers' Association said that the German BfR Committee was full of industry members. Eventually it was admitted that the RMS did not actually review the published toxicology studies themselves, but instead relied on a summary provided to them by the Glyphosate Task Force (GTF). "*Due to the large number of submitted toxicological studies, the RMS was not able to report the original studies in detail and an alternative approach was taken instead.*"

It would be a pity to waste all that work done by the European GTF
Am I correct in saying that the US EPA must have commissioned the GTF to draft their Glyphosate Issue Paper: Evaluation of Carcinogenic Potential?
Page 140: "*The available data at this time do no support a carcinogenic process for glyphosate.*"
Naturally the US EPA would support the European Food Safety Authority and Britain and conclude that glyphosate was not carcinogenic.
Of course the paper would not dwell too much on the battle between the International Agency for Research into Cancer and EFSA over those 71 commercially secret studies that the GTF so generously made available in a Reading Room of a Brussels Library under strict conditions, as a special concession to the European Commissioner for Health (or Sickness)

Britain, the USA and the European Union are making a lot of money out of life-killing chemicals: they are using their own people as LAB RATS

A global industry has emerged to advise on Biocides (= a substance that is KILLING LIFE) Regulation**.** Biocides Symposia are held regularly around the world to "*get up-to-speed on all that's new in biocidal products regulation"* to "*stay one step ahead*." Courses are from £300-400 per day to $1585 for a Symposium. A multitude of firms have clients from 'industry, crop protection and government'. Chemical Watch **Biocides**Hub (Shrewsbury UK) offers 13 Events on Biocides Regulation in 2016, ranging from beginners courses to advanced courses. **REACH (R**egistration, **E**valuation, **A**uthorisation and Restriction of **Ch**emical substances) is a regulation of the European Union, adopted to improve the protection of human health and the environment from the risks that can be posed by chemicals, while enhancing the competitiveness of the EU chemicals industry. It also promotes alternative methods for the hazard assessment of substances in order to reduce the number of tests on animals.
It came into force in 1st June 2007. *Exponent Inc*. is a company that helps chemical firms with **REACH** compliance. It describes itself as "*a research and scientific consultant firm with clients from industry (including crop protection) and government." Exponent Inc.* was employed by Bayer to criticise EFSA's work on neonicotinoids and bees in 2013. It also contributed to a review by a Dow employee that concluded that "*exposure to specific pesticides during critical periods of brain development and neurobehavioral outcomes is not compelling."*
Dr Caroline Harris, a Vice-President of *Exponent Inc*, is also on the UK Advisory Committee on Pesticides…long before it became the Expert Committee on Pesticides that would allow Syngenta and Bayer to attend and advise on their own products. Prof Alan Boobis, who as you can see in the document has conflicts of interest, is Chairman of the UK Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment (CoT) that is claimed to be an independent committee…

Dave Bench and Lord de Mauley refused to ban home use of neonicotinoids at the Environmental Audit Committee Inquiry into Insects and Insecticides in 2012. In 2013 the CMO England and PHE said there was no danger to the foetus of exposure to chemicals
Was it because Bayer had just brought out its family friendly range of garden products? *"Last season Bayer Garden introduced new packaging designed to create a 'family' feel across its products. The aim was to make sure gardeners would know the product they were about to purchase was manufactured by a company they already knew and trusted through favourite products, including Provado Ultimate Bug Killer, Bio Slug & Snail Killer and Super Strength Glyphosate."* Two British public health doctors had been signatories to The Faroes Statement in 2007: "*The periods of embryonic, foetal and infant development are remarkably susceptible to environmental hazards. Toxic exposures to chemical pollutants during these windows of increased susceptibility can cause disease and disability in infants, children and across the entire span of human life."* Presumably they were ignored?
Effects of exposure of the brains of unborn and young children in the UK to chemicals is reflected in OECD PISA figures for declining educational achievement in 2013. In 2000, the UK was in 4th place: but by 2013 they were in 26th place for mathematics and 23rd for reading. A 2016 study also shows that in England the young have lower basic skills than their counterparts in Europe. That's why our European colleagues say that the British people are being used as **LAB RATS**. They are not bothered that the UK voted for Brexit.

Why are the areas growing Roundup® Ready corn and soy in the US biological deserts? Neither the USDA nor the US EPA has bothered to ask that question. Only the US Geological Survey (USGS) has been measuring pesticides. USGS reported widespread contamination of soil, air, rainwater and river water with glyphosate and its longer-acting metabolite AMPA (α-amino-3-hydroxy-5-methyl-4-isoxazolepropionic acid) in 38 US States. Water samples included streams, groundwater, ditches and drains, large rivers, soil water, lakes, ponds and wetlands, precipitation, soil and sediment, and wastewater treatment plants.

I sent evidence to Bernhard Url and JoséTarazona of EFSA about how Roundup® has poisoned our small nature reserve in Wales over 10 years of being exposed to ultra-low dose Roundup® that had been sprayed to eradicate Japanese knotweed in two adjacent valleys. But they accepted the German RMS BfR version of glyphosate as having minimal effects on the environment. So Prof Gilles-Eric Séralini suggested I send a written Testimony to the Monsanto Tribunal. The Monsanto Tribunal begins in The Hague on 14 October 2016. Details of the agenda can be seen at the end of this document. www.monsanto-tribunal.org

On 06/09/2016 Natural Resources Wales (NRW) said fry (juvenile salmon hatched in spring, 2016) are at critically low levels on the rivers Usk, Towy and Clwyd. Three of the best salmon fishing rivers in Wales suddenly have no salmon fry. Has NRW been monitoring aquatic invertebrates on which salmon feed? They are the canaries in the cage. There are scientific papers to show that aquatic invertebrates are poisoned by glyphosate. Presumably they are vulnerable to pesticides and fertilizer run-off from farmland. If invertebrates disappear humans won't be far behind. The AM for Natural Resources Wales has written to say that the reassessment of glyphosate is not yet complete! Where is the precautionary principle?

Dr Don Huber speaking about GMO crops and glyphosate
"Future historians may well look back upon our time and write, not about how many pounds of pesticide we did or didn't apply, but by how willing we are to sacrifice our children and future generations for this massive genetic engineering experiment that is based on flawed science and failed promises just to benefit the bottom line of a commercial enterprise."

Humans and the environment are being silently poisoned by thousands of untested and unmonitored chemicals
The agrochemical industry has created a toxic environment from which none can escape. The devastating effects of these silent killers in our environment do not distinguish between farmers or city dwellers, the wealthy or the poor, between media moguls, editors or their reporters, Monsanto or Syngenta Executives, Prime Ministers or Presidents.

"Corporate totalitarianism … rules through dispensability and corruption. It treats communities, people, countries, ecosystems and species as disposable and dispensable."

Rosemary Mason MB ChB FRCA
27/09/2016

PS I feel even more sorry for American citizens, 60 million of whom took time to warn the European Union about the dangers of GM crops and glyphosate.
Many senators and members of the judiciary were former Monsanto employees and have blocked the DARK Act (Deny Americans the Right to Know) that would allow GM labelling.
Some Supreme Court Judges have ruled in favour of Monsanto and against farmers when their organic crops have been contaminated with GM.
Monsanto has designed a novel spray.[i] *"The sprays in question are powered by a genetic technology called RNA interference, which promises to kill specific insects and weeds by silencing genes crucial to their survival, while leaving nontarget species unscathed. However, the RNAi compound itself will have to be reviewed by the Environmental Protection Agency, which vets new pesticides before they reach farm fields. Early indications suggest the going will be bumpy. Last year, the EPA convened a scientific advisory*

panel to assess the human health and ecological risks posed by emerging RNAi crop technologies. The panel concluded there's "no convincing evidence" that RNAi material poses a threat to humans or other animals—the digestive process likely destroys it before it can do harm. But for non-target insects in the field, they concluded, it's a different story. The technology's boosters claim the technology can target particular pests and leave everything else in the ecosystem alone. The independent scientists on the EPA panel were not convinced.