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Comment On: EPA-HQ-OPP-2016-0385-0001
Meetings: Federal Insecticide, Fungicide, and Rodenticide Act Scientific Scientific Advisory Panel

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General Comment

Glyphosate is an important herbicide product with benign toxicological profile, excellent efficacy on a broad spectrum of weeds,
significant economic and environmental benefits, and a very long history of safe use when used according to label directions,
be it for agricultural, industrial, amenity, forestry, aquatic, or lawn and garden applications. The molecule has been reviewed
and approved repeatedly for over 40 years by EPA and other regulatory agencies around the world.

More recently, the molecule has been the target of lots of non-science based activist pressure and social media, with rampant
allegations that have no basis in fact or science whatsoever. In 2015, glyphosate was misclassified as a 'probable carcinogen'
by a small group within the France-based IARC institute that is notorious for its anti-chemistry and anti-technology lenience,
for its infiltration by activist "experts" with obvious conflicts of interest, and for its conclusory reasoning and classifications.

Since then, IARC's view has been rejected quickly and repeatedly by experts and regulators globally, and by WHO/FAO JMPR.
Based on the exceptionally large and comprehensive scientific dataset available, already reviewed and summarized by the
EPA CARC in 2015, and as reviewed and summarized by the German Bfr and other EU Member States, EFSA, Canadian
PMRA, Swiss pesticide authorities, Australian APVMA, New Zealand EPA, and numerous other independent experts in the
field, there is NO BASIS for any concern in general, and no mutagenic or carcinogenic potential of glyphosate in particular.

There never was and still is no justification for EPA to hold this Scientific Advisory Panel, and certainly no basis to change
glyphosate's current non-carcinogenic classification ('E'). Considering the safety profile of glyphosate and the environmental
and economic benefits, EPA should conclude this SAP as soon as possible and conclude the re-registration action based
on sound science and science alone. This is EPA's obligation under FIFRA and EPA's important responsibility to the American
people and especially the American farmers.