

**From:** ECHA EO  
**Sent:** 05 April 2016 15:39  
**To:** ECHA Mail Registration  
**Cc:** [REDACTED] ECHA EO  
**Subject:** FW: GLYPHOSATE Monograph .Vol 112 (2015)

<b>ECHA</b>	<b>A/0666</b>
<b>05 -04- 2016</b>	
Deadline:	
File:	
Directorate: <i>D2</i>	
Unit: <i>CC B1</i>	

Dear mail registration,

Please register and place in the green folder for [REDACTED]'s view.  
The attribution recommendation from [REDACTED] is: [REDACTED] (for information or for action if he sees the need or reattribution in case he sees it necessary to attribute elsewhere at ECHA).

Thank you very much in advance.

Best regards,  
[REDACTED]

**From:** [REDACTED]  
**Sent:** 27 March 2016 14:57  
**To:** [REDACTED]  
**Cc:** [REDACTED] ECHA EO  
**Subject:** Fw: GLYPHOSATE Monograph .Vol 112 (2015)

Dear [REDACTED]

My personal thanks to your group of honourable scientists for putting their names to your paper: 'Differences in the carcinogenic evaluation of glyphosate....', rightly criticising EFSA's peer review on glyphosate. No doubt we were all very pleased to observe IARC exposing limited evidence of cancer in humans, but I am less happy on IARC's Glyphosate monograph Vol 112 (2015) as you will see from this correspondence. I am particularly interested as to why there is no isotope value for <sup>14</sup>C Glyphosate for the prostate in the available papers - perhaps you have some information on this?

I take the view that questions in addition to prostate cancer are unanswered in respect of glyphosate' s presence in the brain, reproductive organs and its ability to pass through the placenta.

I have seen [REDACTED]'s reply and I would have thought he of all people would be incensed that the Regulating Authorities allowed the GLyphosate Task Force a voice in the proceedings.

Best Wishes  
[REDACTED]

----- Forwarded Message -----

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]

[REDACTED]  
[REDACTED]  
Sent: Thursday, 24 March 2016, 10:52

Subject: Re: GLYPHOSATE Monograph .Vol 112 (2015)

Dear [REDACTED]

Thank you for your response. The IARC has got this wrong, the Monograph alerts the reader to the importance of the Agriculture Health Study and then finally reports that no association with prostate cancer was found. It is difficult to understand how the IARC can justify this claim when there is evidence that links glyphosate to prostate cancer.

Subsequent to the introduction of glyphosate for use on agricultural crops US rates of prostate cancer accelerated in mid to late 1980's with Canadian rates following (1). The IARC Monograph leaves the reader ignorant of the Koutros et al principal finding (2) which, I repeat is 'A significant excess of prostate cancer was seen for private and commercial applicators.....'.

In the WHO INCHEM 159 Glyphosate study the Task Group drew attention to the fact that <sup>14</sup>C Glyphosate concentrations in bone and bone marrow were not measured in Monsanto's 1973 study. These data are included in the INCHEM study at para 6.2 and are significantly high, implying depot storage and contradict EFSA's claim in its 2015 'Peer review of the pesticide risk assessment of the active substance glyphosate' ... that the chemical does not accumulate.

INCHEM scientists appear to have overlooked the quoted (Monsanto derived) Ridley and Mirly 1988 data that did not provide <sup>14</sup>C Glyphosate data for the prostate. In JMPR's 2004 Glyphosate 95 -169 review this data is provided by Powles and is extended, but again prostate data is absent. Where these omissions deliberate? Both sets of data are from unpublished sources, but both are indicative that ingested glyphosate is present in all organs of mammals.

WHO INCHEM and JMPR have relied on Monsanto's unpublished non peer reviewed glyphosate data and both fail to inform on the effects of glyphosate on the prostate. EFSA in its Peer review of glyphosate appears (in its secrecy) to have failed to do so too.

The increase of cancers, including prostate cancer, that spread usually fatally to the bone appear facilitated by the presence of glyphosate, both in the organ and in the bone/bone marrow. The absence of <sup>14</sup>C Glyphosate data for the prostate would appear to be a deliberate act which IARC by stating 'no association' has lent itself to this ongoing deception.

Yours Sincerely

[REDACTED]

24 March 2016

Copy

[REDACTED]

References:

1. K McDavid et al 2004: Prostate Cancer Incidence and Mortality Rates and Trends in the United States and Canada.
2. S. Koutros et al 2010: An Update of Cancer Incidence in the Agricultural Health Study.

**From:** [REDACTED]

**To:** " [REDACTED]

**Cc:** " [REDACTED]

**Sent:** Saturday, 19 March 2016, 19:19

**Subject:** FW: GLYPHOSATE Monograph .Vol 112 (2015)

Dear Mr [REDACTED]

Thank you for your message concerning the recent IARC Monograph on Glyphosate. Regarding the publications cited, the IARC expert Working Group systematically assembled and evaluated all relevant evidence available in the public domain for independent scientific review. For the IARC Monograph on glyphosate, the total volume of publications and other information sources considered by the Working Group was about 1000 citations. All citations were then screened for relevance, following the principles in the Preamble to the Monographs.

After this screening process, the Monograph sections on cancer epidemiology and cancer bioassays in laboratory animals cited every included study. However, as the Koutros et al. (2010) study did not provide any primary cancer-relevant data on glyphosate, it was not included in the Monograph.

On the other hand, the sections on exposure and mechanisms of carcinogenesis consider representative studies and therefore do not necessarily cite every identified study. Accordingly, in addressing the important topics of glyphosate absorption, metabolism, distribution and excretion as well as modulation of cytochrome P450 enzymes in Section 4.1, the Monograph does not cite every identified study. Nevertheless these areas of knowledge are covered by those references which are cited.

The IARC Monographs Programme did not perform or commission any studies concerning distribution or excretion of glyphosate for the purposes of this evaluation. Additionally, it is important to note that the Monographs do not cite research that is in progress or papers that have not been accepted for publication.

Finally, the Monographs do not recommend any specific regulation, policy or other public health action. It remains the responsibility of governments and international organizations to take any public health action to prevent exposure to carcinogens identified by the Monographs. The Agency has however presented its findings at two sessions of the ENVI (Environment, Public Health and Food Safety) Committee at the European Parliament and extended its communication of the Monograph findings in a recent Q&A on our website; these and other initiatives are aimed at ensuring the clearest understanding of the Working Groups evaluation of glyphosate.

We hope to have answered your questions, and thank you again for your interest.

Yours sincerely,  
[REDACTED]

[REDACTED]  
[REDACTED]  
Head IARC Monographs  
International Agency for Research on Cancer  
World Health Organization  
150 cours Albert Thomas  
69372 Lyon Cedex 08, France

Tel [REDACTED]  
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<http://monographs.iarc.fr>

From: [REDACTED]  
Reply-To: [REDACTED]  
Date: Monday, February 29, 2016 11:45 AM  
To: [REDACTED]  
Cc: [REDACTED]

**Subject:** GLYPHOSATE Monograph .Vol 112 (2015)

Dr [REDACTED]  
Director, IARC  
150 Cours Albert Thomas  
69008 Lyon  
CEDOX 08  
France

Dear [REDACTED]

GLYPHOSATE Monograph, Vol 112 (2015)

I am deeply concerned that research failures by your Working Group has led IARC underestimating the fact that glyphosate is no more than 'probably carcinogenic to humans' (group 2A), particularly in respect of prostate cancer.

At 5.2 Human carcinogenicity data the Working Group emphasized the importance of evidence from the AHS cohort and then at 5.2.2 the Working Group claims no association of glyphosate to a range of cancers including prostate cancer, whereas in Stella Koutros et al's 2010 research 'An Update of Cancer Incidence in the Agricultural Health Study' the primary result was 'A significant excess of prostate cancer was seen for private and commercial applicators...' The Koutros paper is excluded from the monograph.

At 4.1.3 Distribution (a) the monograph states 'No data in humans on the distribution of glyphosate in systemic tissues other than blood were available to the Working Group.' EFSA reports in its Review (1) that 'absorbed glyphosate is...widely distributed in the body'. As the IARC mission is 'to coordinate and conduct research on the causes of human cancer' (2) it begs the question as why after 40 years since the introduction of glyphosate has this not been done?

Glyphosate in different concentrations was found in all organs or tissues of malformed piglets in a study by Monika Krueger et al 'Detection of Glyphosate in Malformed Piglets' 2014. Krueger postulates that glyphosate reaches the piglets

through the placenta. Again, why has neither IARC nor any other authority arranged appropriate autopsies for microscopic evaluation on dead fetuses or still-born infants? In Krueger's other paper 'Detection of Glyphosate Residues in Animals and Humans 2014' glyphosate in urine of a healthy population was significantly lower than urine from a chronically diseased population. Neither paper was listed in this Monograph.

Agricultural use of glyphosate commenced in the UK in 1980. Annual deaths from prostate cancer rose from 5,738 to 10,209 in the period 1981 to 2004 (3). In England prostate cancer incidence for men under 65 has risen from 4,084 in 2000 to 9,616 by 2013 (4), subsequent to increased agricultural use of glyphosate estimated at 400% in the 20 years since 2005 (5).

Scientific integrity relies on published peer reviewed papers, but since the passing of the Uniform Trade Secrets Act in the US in 1979 that integrity has been compromised, allowing the agro-chemical industry to protect itself from scrutiny of its scientific papers, which may imply carcinogenic effects – this is morally indefensible.

The EFSA's Review challenges your findings on the fact that glyphosate may cause cancer, but unlike your Monograph it lacks any transparency and no single paper nor its author is identified. The agrochemical industry formulated a Glyphosate Task Force, whose pernicious tactics would appear to be the reason for a whole host of unidentified studies appearing to imply that glyphosate is not carcinogenic. However, as the research industry providers do not claim to provide rodents etc that have been bred on organic feed, nor indeed does it provide organic feed, all these studies would appear to be corrupt (6). There is one exception where EFSA admits that a particular unidentified strain, is prone to cancers - 'not surprising' would be my comment. On the strength of its questionable Review EFSA seeks approval to raise the Admissible Daily Intake from 0.03 mg/kg to 0.05 mg/kg.

Whether glyphosate is safe at all is questioned by scientists Anthony Samsel and Stephanie Seneff, who suggest in their paper 2013 'Glyphosate's suppression of cytochrome P450 enzymes and amino acid biosynthesis by the gut micro biome: Pathways to modern diseases,' that a range of modern diseases, including cancer are caused by ingested glyphosate residues. The IARC Working Party has chosen to exclude the Samsel and Seneff paper.

The EFSA review examined only the principal of glyphosate, namely N-(Phosphonomethyl)glycine. But neither the EFSA Review nor your IARC Monograph have questioned the improbability that this pesticide Glyphosate, is formulated from glycine, an amino acid essential for human metabolism, is safe for human or indeed animal ingestion.

Samsel has now determined that it is indeed hazardous to have a pesticide formulated from an amino acid and with Seneff has produced a fifth paper, now being reviewed, which will give the scientific evidence that glyphosate is a

carcinogen. The paper is titled: Glyphosate Pathways to Modern Diseases: Glyphosate Amino Acid Analogues of Glycine and Diverse Proteins.

I request that you use your authority to suggest to Health and Food Safety at the European Commission that no decision on the renewal of glyphosate should be taken until this 5<sup>th</sup> paper by Samsel and Senseff is evaluated.

Yours Sincerely

[REDACTED]

[REDACTED]

29 February 2016

[REDACTED]

[REDACTED]

Phone: [REDACTED]

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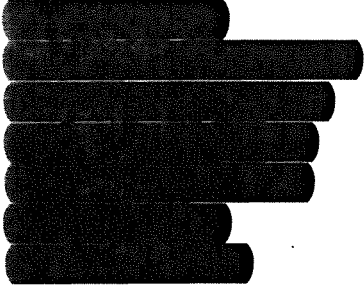
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



## References and Notes:

1. EFSA 2015: 'Peer review of the pesticide risk assessment of the active substance glyphosate'
2. IARC this mission statement (of welcomed brevity and succinctness) is made in International Childhood Cancer Day: 'Much remains to be done to fight childhood cancer'. 15 Feb 2016.
3. Extracted from data kindly provided to me by Cancer Research UK.
4. Extracted from ONS data Cancer statistics registrations. For the year 2000: Series MB1 England No 31 Table 1 C61 Prostate. For the year 2013: Table 1 Registration of newly diagnosed cases of cancer (third digit) by site, sex and age England, 2013: C61 Prostate.
5. Farmer's Weekly 16 July 2015: Call to ban glyphosate on milling wheat. Data provided by Soil Association (UK).
6. ENVIGO a market leader in its catalogue makes no claim to provide organically fed rodents or organic feed.

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