

EXHIBIT 19

File glyphosate cases

DWIGHT CENTRAL FILES

APR - 6 1987

Monsanto

MONSANTO AGRICULTURAL COMPANY
800 N. Lindbergh Boulevard
St. Louis, Missouri 63167
Phone: (314) 694-1000

April 3, 1987

SB 950 Response
Pesticide Registration Branch
California Department of Food
and Agriculture
1220 N Street, Room A447
Sacramento, California 95814

Subject: Glyphosate
Reconsideration of Chronic/Oncogenicity
Mouse Study

Dear Sir:

Monsanto Agricultural Company requests the California Department of Food and Agriculture to reconsider the evaluation of the Chronic/Oncogenicity Study for Glyphosate in Mice (BD-77-420). CDFA has stated that a possible oncogenic effect is demonstrated and has placed the study in Group 3 of the Low Priority List for SB 950 Risk Assessment. Monsanto maintains that there is no treatment related oncogenic effect in this study -- a position supported by experts and regulatory agencies world wide. We hereby request the Department to reconsider this decision and are submitting additional information which clearly supports our position.

We have submitted the following data to CDFA:

1. Eight (8) volumes of data - which is the entire study.
2. Re-examination of male kidneys. These data revealed a tubular adenoma in mouse #1028 (control)

We understand that CDFA does not consider the finding in the control male as real. We had several expert toxicologists examine the slides and give their opinions. At this time, we are forwarding these opinions to CDFA.

EPA also requested that the Scientific Advisory Panel (SAP) review the data and give their opinion as to the classification of glyphosate as a possible human carcinogen. We are submitting the SAP decision at this time. We note that they concluded that the adenoma in the control is real, and that the results of this study do not demonstrate any oncogenic effect.

SB 950 Response
April 3, 1987
Page 2

We are also submitting a copy of the FAO Plant and Protection Paper #77. The WHO Expert Group on Pesticide Residues reviewed all available toxicology data on glyphosate and reported that there is no evidence of carcinogenicity for glyphosate.

We feel that the submission of these additional reports emphasize that expert toxicologists world-wide do not believe that glyphosate is an oncogen. We request CDFA to remove glyphosate from the SB 950 Risk Assessment List based on the data previously submitted and the data submitted at this time.

Should you have questions, please feel free to contact Monsanto.

Sincerely,



Glynadee Edwards
Senior Registration Specialist

/jjs

Enclosures

bcc: J. H. Arvik
E. E. Debus
K. F. Cannon
T. J. Long