Exhibit 1
March 29, 2016

Steven Knott, MS
US Environmental Protection Agency
Office of Science Coordination and Policy
FIFRA Scientific Advisory Panel
EPA East Building, MC 7201M
1200 Pennsylvania Ave., NW
Washington, DC 20460

Re: Comments to the EPA Issue Paper on Glyphosate dated September 12, 2016

Dear Mr. Knott:

I am providing the following comments to the EPA regarding the above cited document. On page 67 of this document, it states that the latency period for non-Hodgkin’s lymphoma (NHL) in general is unknown and that estimates range from 1-25 years with a citation to my 1992 paper [Weisenburger DD, Pathological classification of NHL for epidemiological studies. Cancer Research 52: 5456s-5464s, 1992]. This statement in the EPA document implies that the range of latency periods for glyphosate exposure and the potential development NHL is likely to be within the range. Such an interpretation from my 1992 paper is incorrect. As stated in the paper, the latency period for NHL would be short following cancer treatment with chemotherapy and/or radiation, e.g. 5-6 years, and for atomic bomb survivors about 9 years, with a longer latency for those receiving smaller doses. I further stated that long-term, low-level exposure would be expected to result in a long latency period. For example, the average latency period for the development of NHL due to long-term, low-level exposure to organic solvents is about 20 years. Since exposure to glyphosate would be expected to be long-term, low-level exposure, the citation of my paper for the proposition that a latency period for glyphosate exposure in relation to NHL can range from 1-25 years would contradict the conclusion of my 1992 paper. I would expect the average latency period for glyphosate exposure in relation to potential NHL to be at the upper end of this range, most likely 20 or more years from initial exposure.

Sincerely,

Dennis D. Weisenburger, MD
Professor and Chair
Department of Pathology