

From: [Redacted]
To: [Redacted]
Cc: Carol Stangel/[Redacted]
Date: 10/02/2009 06:39 AM
Subject: Re: EPA's Response re: Glyphosate

Dear Dr. Mae-Won Ho, dear Mrs Carol Stangel,
I was aware of the letter of August 12th 2009 your received from EPA (from Dr. Debra Edwards, Director Pesticide Programs) in Washington, about my recent paper on glyphosate based herbicides, which have been proved to be human cellular endocrine disruptors. This is at doses 800 times less than some maximum residual levels of glyphosate and AMPA in GM feed in the States.

These studies follow several other papers joined, from my group. Of course, in vitro systems must be taken with care concerning extrapolations to a living body. We recall that a careful bibliography has been also reviewed in all these experimental papers taking into account not only the human epidemiological effects of glyphosate based herbicides, but also in vivo effects in lab or wild animals. The conclusions are drawn from all the data together.

Many of the effects of the papers are proved not to be due to the surfactants in the formulated product, and not to glyphosate alone, but to the mixtures of both, plus glyphosate metabolites, by contrast to what is assumed in the letter of Dr. D. E. Surfactants are unfortunately persistent in the environment and detergents contaminating the environment may replace those to help the penetration of glyphosate in cells.

There is a sentence saying "we do not believe that people or terrestrial animals are exposed to the concentrations of surfactant tested in these French experiments". I importantly underline that this belief is not scientifically based. Once again, we had efficient Roundup dilutions at up to 100,000 times less than agricultural dilutions. Roundup and other glyphosate based herbicides are major contaminants in soils and environment.

We had efficient endocrine disruptions at very low doses (see second line) that allow in vivo extrapolation even if we apply a factor of 100 for dilution and excretion of the compound by the body.

I urge EPA to revise their criteria for decisions on this matter.
Sincerely yours,

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