

Message

From: HEYDENS, WILLIAM F [Redacted]
Sent: 10/12/2015 2:05:47 PM
To: GOLDSTEIN, DANIEL A [Redacted]
Subject: RE: Glyphosate and Prop 65- SAM COHEN

Dan – here are instructions for submitting comments.

Written comments must be received by 5:00 p.m. on Monday, October 5, 2015 to be considered. We encourage you to submit comments in electronic form, rather than in paper form. Comments transmitted by e-mail should be addressed to P65Public.Comments@oehha.ca.gov, and should include “NOIL” and the chemical name in the subject line. Comments submitted in paper form may be mailed, faxed, or delivered in person to the address below.

Note: the comment period for Parathion, Malathion and/or Glyphosate has been extended to **October 20, 2015**.

Mailing Address: Ms. Esther Barajas-Ochoa

Redacted

From: GOLDSTEIN, DANIEL A [Redacted]
Sent: Friday, October 09, 2015 8:44 AM
To: Cohen, Samuel M; HEYDENS, WILLIAM F [Redacted] FARMER, DONNA R [Redacted]
Subject: RE: Glyphosate and Prop 65- SAM COHEN

Sam- unsure of e-mail option-

I copied Donna and Bill – they may know.

Thanks so much for your time and effort on this. It is much appreciated.

Dan

From: Cohen, Samuel M [Redacted]
Sent: Friday, October 09, 2015 8:42 AM
To: GOLDSTEIN, DANIEL A [Redacted]
Subject: RE: Glyphosate and Prop 65- SAM COHEN

And several from EPA.

I plan to submit my letter by the end of today.

Do I send it by fax to the number given, or can I also send it by email?

From: GOLDSTEIN, DANIEL A [Redacted]
Sent: Friday, October 09, 2015 8:41 AM
To: Cohen, Samuel M
Subject: RE: Glyphosate and Prop 65- SAM COHEN

Yes.... She drives Prop 65 too.... Which comes off animal data from IARC.... One of the reasons, presumably, the animal classification was pushed so hard according to observers.

Many interesting pieces in the puzzle- Portier and Zeise as well as the Ag Health Study folks...

Dan

From: Cohen, Samuel M [Redacted]
Sent: Friday, October 09, 2015 8:38 AM
To: GOLDSTEIN, DANIEL A [Redacted]
Subject: RE: Glyphosate and Prop 65- SAM COHEN

I note that Lauren Zeise from Cal EPA was on it!

From: GOLDSTEIN, DANIEL A [Redacted]
Sent: Friday, October 09, 2015 8:35 AM
To: Cohen, Samuel M
Subject: RE: Glyphosate and Prop 65- SAM COHEN

Here you go.... Good timing- still in my hotel with computer.... Don't have it on my i-pad!! ☺

From: Cohen, Samuel M [Redacted]
Sent: Friday, October 09, 2015 8:30 AM
To: GOLDSTEIN, DANIEL A [Redacted]
Subject: RE: Glyphosate and Prop 65- SAM COHEN

Do you have the list of participants at the IARC glyphosate review?

I'm not able to open the connection to that information in the monograph.

From: GOLDSTEIN, DANIEL A [Redacted]
Sent: Tuesday, October 06, 2015 12:08 PM
To: Cohen, Samuel M
Subject: FW: Glyphosate and Prop 65- SAM COHEN

Sam-

Apologies that I was not able to get this out yesterday. I wanted to provide you a draft letter and I was under the impression that a model letter was available, but this was not the case (we had models, but not appropriate to your expertise). I consequently had to pull one together.

The model letter is intended to provide the *pro-forma* content needed for transmission of the letter (fyi...NOIL = Notice of Intent to List in Cal-Speak) and to provide suggested content to minimize the work on your end given your schedule. You are obviously free to comment entirely as you wish and to change the letter in any way that suits your opinion.

I know you have specific opinions about the IARC process itself, and you should feel free to express them. I have limited my draft comments to factual information as I do not feel it is appropriate for me to attempt to draft comments on IARC itself.

I have attached a brief backgrounder on Prop 65 as well as the Monograph and an internal review of the Monograph. NOTE - I am happy to provide any of the background documents that you may want to see including summary documents ([Redacted] review, [Redacted] review, etc.) and original publications- speak and you shall receive!

As a final note- the labeling of glyphosate products, especially the concentrates, is probably a given as this is (my understanding) written into Prop 65 language and driven automatically off of the IARC 2A classification. Your input on the broader issue will nonetheless be very important as OEHHA will need to consider the "safe harbor" rules around diluted product and, more importantly, food and beverages. We do not currently believe that food residues would justify labeling of foods but there is apparently some room for OEHHA discretion in that area.

Your help is tremendously appreciated. Contact me if you need anything.

Best regards- Dan

From: FARMER, DONNA R [Redacted]

Sent: Monday, October 05, 2015 3:25 PM

To: GOLDSTEIN, DANIEL A [Redacted] HEYDENS, WILLIAM F [Redacted]

Subject: RE: Glyphosate and Prop 65- SAM COHEN

Correct attachments this time.

Yes that one was written for the ITO contacts to edit and send as they saw fit.

It was the only one I had so I thought it would work.

From: GOLDSTEIN, DANIEL A [Redacted]
Sent: Monday, October 05, 2015 3:21 PM
To: FARMER, DONNA R [Redacted]; HEYDENS, WILLIAM F [Redacted]
Subject: RE: Glyphosate and Prop 65- SAM COHEN

Sorry- missed the 2nd attachment.....

I assume we want them to edit the letter as desired and then sign...

Dan

From: FARMER, DONNA R [Redacted]
Sent: Monday, October 05, 2015 2:54 PM
To: GOLDSTEIN, DANIEL A [Redacted]; HEYDENS, WILLIAM F [Redacted]
Subject: FW: Glyphosate and Prop 65- SAM COHEN
Importance: High

From: GOLDSTEIN, DANIEL A [Redacted]
Sent: Friday, October 02, 2015 2:57 PM
To: FARMER, DONNA R [Redacted]; HEYDENS, WILLIAM F [Redacted]
Subject: FW: Glyphosate and Prop 65- SAM COHEN
Importance: High

Please see below-

SAM CAN DO THIS BUT WANTS MATERIAL MONDAY OR TUESDAY-

Do we have draft correspondence?? I assume I can send him the monograph and share our summary of the analysis.

Do we have suggested commentary of any sort?? In particular- do we have a comment we want him to make on the food labeling issue vs labeling of product???

I have discussed this topic (and the subject of IARC in general) with Sam and he is a strong supporter.

Dan

From: Cohen, Samuel M [Redacted]
Sent: Friday, October 02, 2015 2:53 PM
To: GOLDSTEIN, DANIEL A [Redacted]
Subject: RE: Glyphosate and Prop 65

I would be willing to do this, as long as you can get the material to me by Monday or Tuesday.

From: GOLDSTEIN, DANIEL A [Redacted]
Sent: Friday, October 02, 2015 2:40 PM
To: Cohen, Samuel M
Subject: Glyphosate and Prop 65

L'shana tovah- I hope this finds you well. Knowing you are busy, I will keep my request brief.

As you probably are aware, IARC has classified glyphosate as a probable human carcinogen. The process for the meeting was highly irregular, and the outcome flies in the face of EPA and the new EU risk assessment. Because IARC is a default driver of California Prop 65 labeling, **glyphosate is now being considered for Prop 65 labeling. A public comment period extends through October 20.**

QUESTION: Would you be willing to consider submitting a comment to OEHHA regarding carcinogenicity classification of glyphosate?

If you are willing to consider this, I am happy to send you the IARC monograph and a summary of same with commentary, as well as a pro-forma letter with the proper address, etc. so that you do not need to dig out the procedural information. Your comments, obviously, would be your own- but this would minimize the effort needed on your part.

Please let me know if you would be willing to look at this material.

Thanks as always! Dan

Daniel A. Goldstein, M.D.

FAAP, FACMT, FRCP(C), DABCP

Follow me on Twitter: @DrDan_biotech

Senior Science Fellow

Lead, Medical Sciences and Outreach

Monsanto

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