



October 4, 2016

Mr. Steven Knott
DFO, Office of Science Coordination and Policy (7201M)
Environmental Protection Agency
1200 Pennsylvania Ave. NW.
Washington, DC 20460-0001

Re: Federal Insecticide, Fungicide, and Rodenticide Act Scientific Advisory Panel on Glyphosate
[EPA-HQ-OPP-2016-0385]

Dear Mr. Knott:

Thank you for the opportunity to comment in advance of the October 2016 Federal Insecticide, Fungicide and Rodenticide (FIFRA) Scientific Advisory Panel (SAP) on EPA's evaluation of the carcinogenic potential of glyphosate [EPA-HQ-OPP-2016-0385].

Glyphosate has many benefits within non-agricultural pesticide use patterns and is an important tool for protecting public safety and infrastructure and reducing the effects of invasive species on our environment. As a broad-spectrum herbicide, glyphosate effectively removes weeds and unwanted vegetation and can be part of an Integrated Pest Management (IPM) program.

For example, roadside vegetation managers use glyphosate to reduce vegetation on roadsides that can impede driver visibility and endanger motorists. This reduces the need for mowing in these spaces, which protects workers and reduces costs for state and local transportation departments. Applicators also use glyphosate to manage vegetation threatening public infrastructure in utility rights of way. Further, glyphosate is used to control invasive plant species that compete with native species for space and resources. It is critical that glyphosate remain available for these and other uses.

Glyphosate also has low toxicity for humans and is practically non-toxic to fish, aquatic invertebrates, and honeybees. It has been deemed non-carcinogenic by regulatory agencies around the world and has been subject to an extraordinary number of scientific tests supporting its safety and efficacy during more than 40 years of safe and effective use. EPA has repeatedly found glyphosate to be non-carcinogenic, including in a recent report by the Agency's Cancer Assessment Review Committee (CARC). Given the amount of data in support of its ability to be used safely and EPA's own findings

on the subject, it is unclear why EPA is holding a SAP for glyphosate. CARC did not find any reason for concern, so it seems duplicative to go through the additional step of convening this SAP.

Though we do not agree the SAP should take place, if the Agency proceeds to hold the meeting, we urge EPA to abide by its obligation to choose qualified and impartial candidates to sit as ad hoc members on the SAP. SAP members must be free of conflicts of interest, and we ask EPA to choose candidates with appropriate credentials who will render a scientifically-supported decision.

Thank you for reviewing our comments, and please contact us with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Aaron Hobbs". The signature is stylized with a large, sweeping "A" and a cursive "Hobbs".

Aaron Hobbs
President
RISE, Responsible Industry for a Sound Environment
1156 15th Street, NW
Suite 400
Washington, DC 20005
Phone: 202-872-3860

RISE is a national not-for-profit trade association representing more than 220 producers and suppliers of specialty pesticide and fertilizer products to both the professional and consumer markets. RISE member companies manufacture more than 90 percent of domestically produced specialty pesticides used in the United States, including a wide range of products used on lawns, gardens, sport fields, golf courses, and to protect public health.