

# Current understanding of glyphosate's risk profile

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### Where this talk is going:

- -Introductory comments
- -Public concern over glyphosate in food
- -Public concern over glyphosate influencing human microbiome
- -Public concern over glyphosate causing cancer

# Hmmmm.... Millionth (or so) time I've been asked to present on glyphosate!

 \$289 million court verdict to pesticide applicator in California

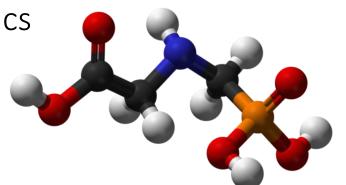
Court decisions do not change the scientific understanding.

- Glyphosate use is a problem
   40 years reliance and 18.9 billion lbs per year worldwide¹ is a set-up of common sense proportions.
- Glyphosate is a good product

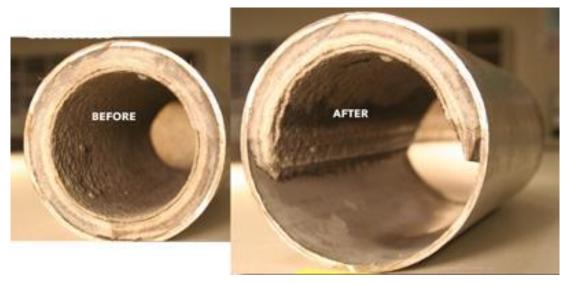
  Despite wide use and creeping resistance glyphosate remains an effective and low risk herbicide.

### Glyphosate basics

- Does not volatilize
- Does not photodegrade
- No to slight mobility in soil
  - K<sub>oc</sub> of 2,600 to 4,900
  - Binds organic carbon and clay in soil; can form metal complexes
- In water, binds to suspended solids and sediment
- Biodegradation largely by bacteria;
  - Soil 1.85 to 7 days (aerobic conditions) but as long as 428 days in other conditions
  - Sediment 8 days
  - Cold temps slow degradation rate
- Low potential to bioaccumulate (BCF 0.52)



### What chelators do



Mineral scale build up inside of pipes.

Birthday's are good for your health.

Studies have shown that those who have more, live longer.

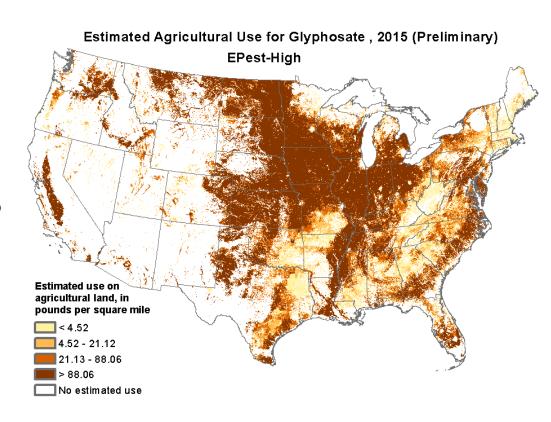




## Concerns for glyphosate in our food

Is it probable we are being exposed to glyphosate in our food? *Yes* 

- 2018 Indiana study of pregnant women found 93% of participants had glyphosate in their urine<sup>2</sup>.
- This usage map<sup>3</sup> ->



# Glyphosate residues in federal sampling programs



- USDA sampled just over 10,000 agricultural commodities in 2016 and tested for ~450 different current use and legacy pesticides<sup>4</sup>.
- No glyphosate analyzed by USDA.



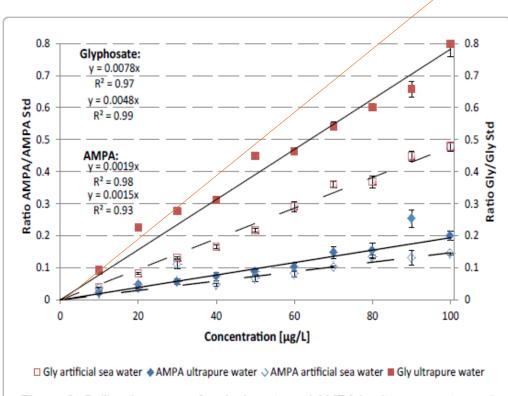
- FDA sampled 6,406 agricultural commodities in 2015 and tested for ~700 different pesticides and chemicals of concern<sup>5</sup>.
- No glyphosate analyzed by FDA.

### WHY? ..... Testing for glyphosate is hard!

#### Analytical challenges

 All methods are heavily influenced by what else is in the sample.

Orange line shows ideal, put 40 ppm in the sample and read out 40 ppm.



**Figure 3:** Calibration curves for glyphosate and AMPA in ultrapure water and artificial sea water (10-100 μg/L).

Reference 6

Glyphosate is allowed in food

The amount allowed is regulated as a tolerance listed in the US CFR

#### §180.364 Glyphosate; tolerances for residues.

(a) General. (1) Tolerances are established for residues of glyphosate, including its metabolites and degradates, in or on the commodities listed below resulting from the application of glyphosate, the isopropylamine salt of glyphosate, the ethanolamine salt of glyphosate, the dimethylamine salt of glyphosate, the ammonium salt of glyphosate, and the potassium salt of glyphosate. Compliance with the following tolerance levels is to be determined by measuring only glyphosate (N-typhosphonomethyl)glycine).

| Commodity                                      | Parts per<br>million |
|--|----------------------|
| Acerola  | 0.3                  |
| Alfalfa, seed                                  | 0.,                  |
| Almond, hulls                                  | 25                   |
| Aloe vera                                      | 0.5                  |
| Ambarella                                      | 0.2                  |
| Animal feed, nongrass, group 18                | 400                  |
| Artichoke, globe                               | 0.2                  |
| Asparagus                                      | 0.5                  |
| Atemoya  | 0.2                  |
| Avocado  | 0.2                  |
| Bamboo, shoots                                 | 0.2                  |
| Banana   | 0.2                  |
| Bar V, bran                                    | 30                   |
| Beet, sugar, dried pulp                        | 2:                   |
| Beet, sugar, roots                             | 10                   |
| Beet, sugar, tops                              | 10                   |
| Berry and small fruit, group 13-07             | 0.20                 |
| Betelnut                                       | 1.0                  |
| Biriba   | 0.3                  |
| Blimbe   | 0.2                  |
| Breadfruit                                     | 0.2                  |
| Cacao bean, bean                               | 0.2                  |
| Cactus, fruit                                  | 0.5                  |
| Cactus, pads                                   | 0.5                  |
| Canistel                                       | 0.2                  |
| Carrot   | 5.0                  |
| Chaya  | 1.0                  |
| Cherimoya                                      | 0.2                  |
| Citrus, dried pulp                             | 1.5                  |
| Coconut  | 0.                   |
| Coffee, bean, green                            | 1.0                  |
| Corn, pop, grain                               | 0.1                  |
| Corn, sweet, kernel plus cob with husk removed | 3.5                  |

Reference 9

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| Commodity                                      | Parts per<br>million |
|--|----------------------|
| Acerola  |                      |
| Alfalfa, seed                                  |                      |
| Almond, hulls                                  |                      |
| Aloe vera                                      | 0                    |
| Ambarella                                      | 0                    |
| Animal feed, nongrass, group 18                | 40                   |
| Artichoke, globe                               | 0                    |
| Asparagus                                      | 0                    |
| Atemoya  | 0                    |
| Avocado  | 0                    |
| Bamboo, shoots                                 | 0                    |
| Banana   | 0                    |
| Barley, bran                                   | 3                    |
| Beet, sugar, dried pulp                        | 2                    |
| Beet, sugar, roots                             | 1                    |
| Beet, sugar, tops                              | 1                    |
| Berry and small fruit, group 13-07             | 0.2                  |
| Betelnut                                       | 1                    |
| Biriba   | 0                    |
| Blimbe   | 0                    |
| Breadfruit                                     | 0                    |
| Cacao bean, bean                               | 0                    |
| Cactus, fruit                                  | 0                    |
| Cactus, pads                                   | 0                    |
| Canistel                                       | 0                    |
| Carrot   | 5                    |
| Chaya  | 1                    |
| Cherimoya                                      | 0                    |
| Citrus, dried pulp                             | 1                    |
| Coconut  | 0                    |
| Coffee, bean, green                            | 1                    |
| Corn, pop, grain                               | 0                    |
| Corn, sweet, kernel plus cob with husk removed | 3                    |

EPA acceptable limits:

Daily Food: RfD = 1.00 mg/kg/day



Health studies (listed next slide)

List of experimental tests EPA required for glyphosate's recent registration review.

December 12, 2017 Glyphosate. Draft Human Health Risk Assessment in Support of Registration Review.

| Table B.1. | Toxicological Data Requirements for Glyphosate. | -             |                 |  |  |
|------------|---|---------------|-----------------|--|--|
| Study      |   | Required Tech | Technical       |  |  |
|            | Study   |               | Satisfied       |  |  |
| 870.1100   | Acute Oral Toxicity                             | yes           | yes             |  |  |
| 870.1200   | Acute Dermal Toxicity                           | yes           | yes             |  |  |
| 870.1300   | Acute Inhalation Toxicity                       | yes           | no <sup>1</sup> |  |  |
| 870.2400   | Primary Eye Irritation                          | yes           | yes             |  |  |
| 870.2500   | Primary Dermal Irritation                       | yes           | yes             |  |  |
| 870.2600   | Dermal Sensitization                            | yes           | yes             |  |  |
| 870.3100   | Oral Subchronic (rodent)                        | yes           | yes             |  |  |
| 870.3150   | Oral Subchronic (nonrodent)                     | yes           | no <sup>2</sup> |  |  |
| 870.3200   |   | yes           | yes             |  |  |
| 870.3465   | 90-Day Inhalation                               | yes           | yes             |  |  |
| 870.3700a  | Developmental Toxicity (rodent)                 | yes           | yes             |  |  |
| 870.3700Ь  | Developmental Toxicity (nonrodent)              | yes           | yes             |  |  |
| 870.3800   | Reproduction                                    | yes           | yes             |  |  |
| 870.4100a  | Chronic Toxicity (rodent)                       | yes           | yes             |  |  |
| 870.4100b  | Chronic Toxicity (nonrodent)                    | yes           | yes             |  |  |
| 870.4200b  | Oncogenicity (mouse)                            | yes           | yes             |  |  |
| 870.4300   | Chronic/Oncogenicity                            | yes           | yes             |  |  |
| 870.5100   | Mutagenicity—Gene Mutation - bacterial          | yes           | yes             |  |  |
| 870.5300   | Mutagenicity—Gene Mutation - mammalian          | yes           | yes             |  |  |
| 870.5xxx   | Mutagenicity-Structural Chromosomal Aberrations | yes           | yes             |  |  |
| 870.5xxx   |   | yes           | yes             |  |  |
| 870.6100a  | Acute Delayed Neurotoxicity (hen)               | no            | no              |  |  |
| 870.6100b  | 90-Day Neurotoxicity (hen)                      | no            | no              |  |  |
| 870.6200a  | Acute Neurotoxicity Screening Battery (rat)     | yes           | yes             |  |  |
| 870.6200b  | 90-Day Neurotoxicity Screening Battery (rat)    | yes           | yes             |  |  |
| 870.7485   |   | yes           | yes             |  |  |
| 870.7600   | Dermal Penetration                              | no            | no              |  |  |
| 870.7800   | Immunotoxicity                                  | yes           | ves             |  |  |

The requirement for an acute inhalation LC50 study was waived.

<sup>&</sup>lt;sup>2</sup> This is not considered a data gap because there is a chronic dog study in the database.

EPA acceptable limits:

Daily Food: RfD = 1.00 mg/kg/day

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1.0 mg of glyphosate

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for each kilogram of your body weight

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EPA acceptable limits:

Daily Food: RfD = 1.00 mg/kg/day

1.0 mg of glyphosate

for each kilogram of your body weight

per day

A 65 kg person could allowably consume 65 mg glyphosate per day and expect no long/short term effects including cancer risks.

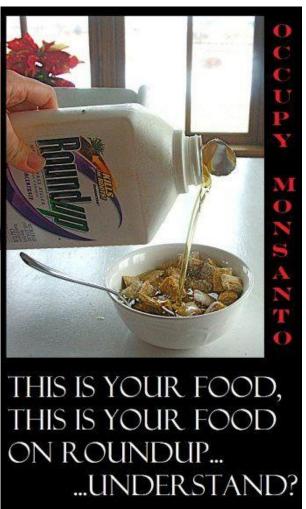
#### Recent headlines:



#### Breakfast With a Dose of Roundup?

Weed Killer in \$289 Million Cancer Verdict Found in Oat Cereal and Granola Bars





# Comparing EPA's allowable limit to EWG's analysis:

| Food Item            | Average<br>(ppb) | ug/kg | mg/kg  | mg/g     | mass<br>eaten (g) | mg<br>glyphosate<br>per item |
|----------------------|------------------|-------|--------|----------|-------------------|------------------------------|
| Granola              | 229.1            | 229.1 | 0.2291 | 0.000229 | 60                | 0.014                        |
| Instant oats         | 461.3            | 461.3 | 0.4613 | 0.000461 | 60                | 0.028                        |
| Oat breakfast cereal | 325.0            | 325.0 | 0.3250 | 0.000325 | 60                | 0.020                        |
| Snack bar            | 138.6            | 138.6 | 0.1386 | 0.000139 | 60                | 0.008                        |
| Whole oats           | 336.7            | 336.7 | 0.3367 | 0.000337 | 60                | 0.020                        |

EWG's report didn't use EPA's allowable limit, instead they created a new one at 0.01 mg/kg/day

EPA acceptable limits:

Daily Food: RfD = 1.00 mg/kg/day

A 65 kg person could allowably consume 65 mg glyphosate per day and expect no long/short term effects including cancer risks.

### Syllogism

A tool in deductive reasoning that takes 2 propositions to lead to a conclusion.

All men are mortal. Socrates is a man.

∴ Socrates is mortal.

All horses have hooves. No humans have hooves.

: Some humans are not horses.

All cats are mortal. Socrates is mortal.

∴ Socrates is a cat.

Gut bacteria are a part of our health.

Glyphosate shares a mechanism of action with plants and bacteria.

Glyphosate will affect our health.

### The Human Microbiome

Actinobacteria

Micrococcineae

Bacteroidetes Cyanobacteria **Firmicutes** 

Other Firmicutes

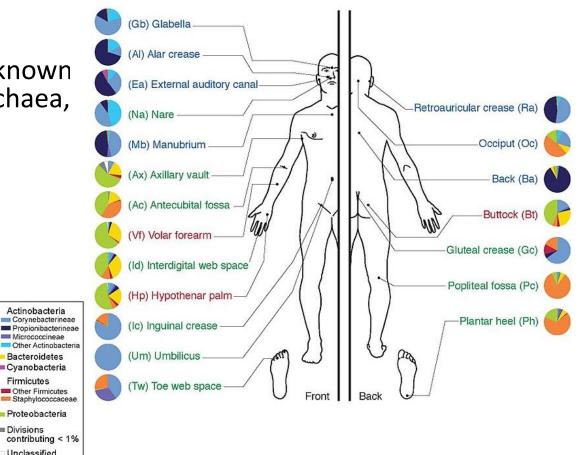
Proteobacteria Divisions

Unclassified

#### We are not alone!

Anatomical areas with known organisms (bacteria, archaea, fungi, viruses):

> Skin Conjun Gut • Urethra nd bladder Vagina Placenta Uterus Oral cavity Lung Biliary tract



### **Gut Health**

Excerpt: SCIENTIFIC AMERICAN.

NEUROSCIENCE

#### How Gut Bacteria Tell Their Hosts What to Eat

By suppressing or increasing cravings, microbes help the brain decide what foods the body "needs"

By Knvul Sheikh on April 25, 2017

Two kinds of bacteria were particularly effective in influencing the appetites of flies this way: *Acetobacter* and *Lactobacillus*. Increasing both was enough to suppress the flies' protein cravings and increase their appetite for sugar.





Could glyphosate be affecting our gut health?

- Given the global exposure we are getting, it would be hard to believe GI effects would go unnoticed. weight of evidence approach
- However, this is an area yet to be fully explored.

#### Mechanism of action for glyphosate

Enzyme EPSP synthase is blocked from working by glyphosate.

#### EPSP synthase used by:

Bacteria,

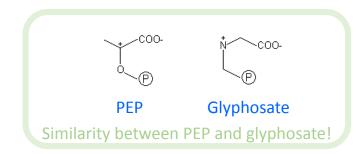
Archaea,

Fungi,

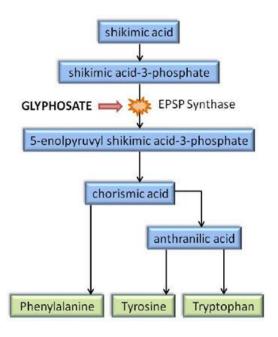
Algae,

some Protozoa, and

**Plants** 

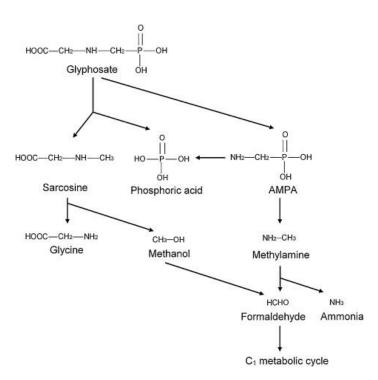


#### Shikimic acid pathway

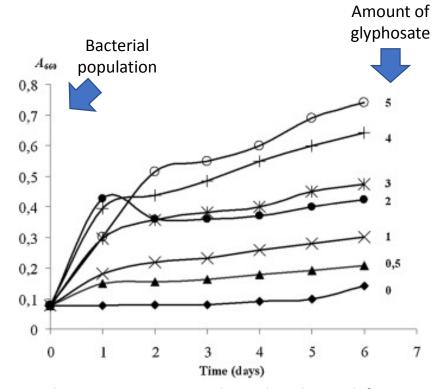


- Glyphosate binds and prevents EPSP synthase from working
- When EPSP synthase isn't working many of the plant molecules are prevented from being made and the plant dies.

#### Glyphosate promotes bacterial growth too



Pathways for the bacterial degradation of glyphosate.



E. cloacae strain, K7 growth on phosphorus deficient media

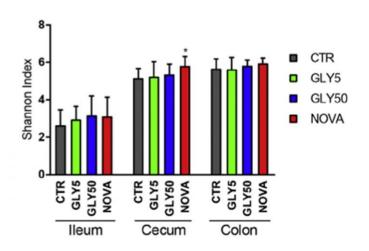
#### In the lab:

- Research shows glyphosate:
  - slows growth and kills bacteria
  - feeds bacteria and promotes growth



#### In living animals:

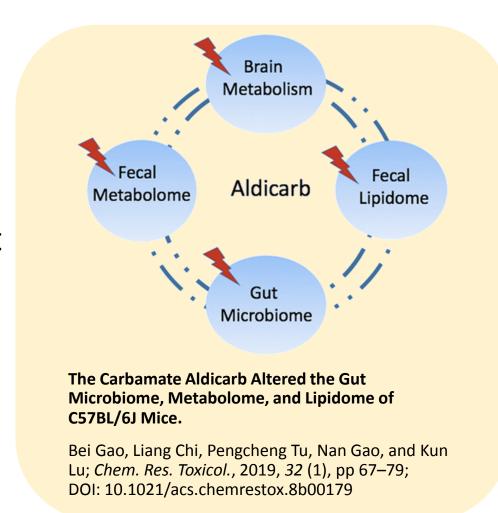
- Research shows glyphosate:
  - does not affect gut bacteria populations in test animals.



Nielsen et al. 2018

#### Aldicarb induced gut change

- Recent report showing significant change in gut microbiome of mice from aldicarb.
- Changes in microbiome lead to other changes.



#### Gut bacteria are a part of our health.

Yes, however we are only now learning which species of bacteria are important.

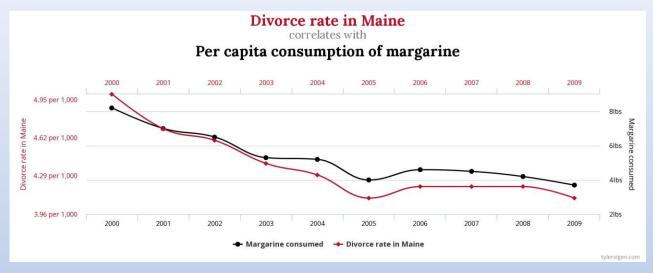
## Glyphosate shares a mechanism of action with plants and bacteria.

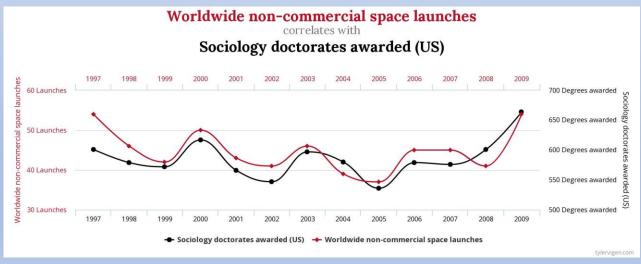
Yes, however only under some circumstances glyphosate can affect bacterial survival.

#### Glyphosate will affect our health.

Still not proven because we first need to establish which bacteria are affected and under what circumstances. Currently, the evidence suggests no effect to our gut health because of the concentration.

### Correlation is not causation.





### The pesticides you use daily are toxic.

The only group of individuals that I feel are at true risk from pesticides are those in contact with them every day.

An ounce of prevention is worth a pound of cure (and piece of mind).

If you get drenched in any pesticide please shower and change your clothes.

Pesticides are not meant to be on your skin.

doi: 10.1093/jnci/djx233 First published online November 9, 2017

Article

ARTICLE

#### Glyphosate Use and Cancer Incidence in the Agricultural Health Study

Gabriella Andreotti, Stella Koutros, Jonathan N. Hofmann, Dale P. Sandler, Jay H. Lubin, Charles F. Lynch, Catherine C. Lerro, Anneclaire J. De Roos, Christine G. Parks, Michael C. Alavanja, Debra T. Silverman, Laura E. Beane Freeman

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Correspondence to: Laura Beane Freeman, PhD, 9609 Medical Center Drive, Rm 6E136, MSC 9771, Bethesda, MD 20892 (e-mail: freemala@mail.nih.gov).

#### Abstract

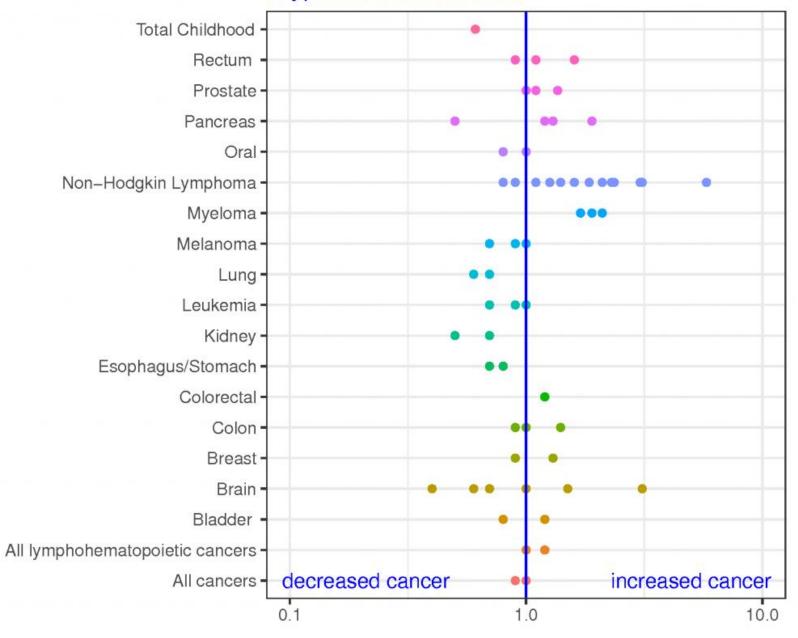
Background: Glyphosate is the most commonly used herbicide worldwide, with both residential and agricultural uses. In 2015, the International Agency for Research on Cancer classified glyphosate as "probably carcinogenic to humans," noting strong mechanistic evidence and positive associations for non-Hodgkin lymphoma (NHL) in some epidemiologic studies. A previous evaluation in the Agricultural Health Study (AHS) with follow-up through 2001 found no statistically significant associations with glyphosate use and cancer at any site.

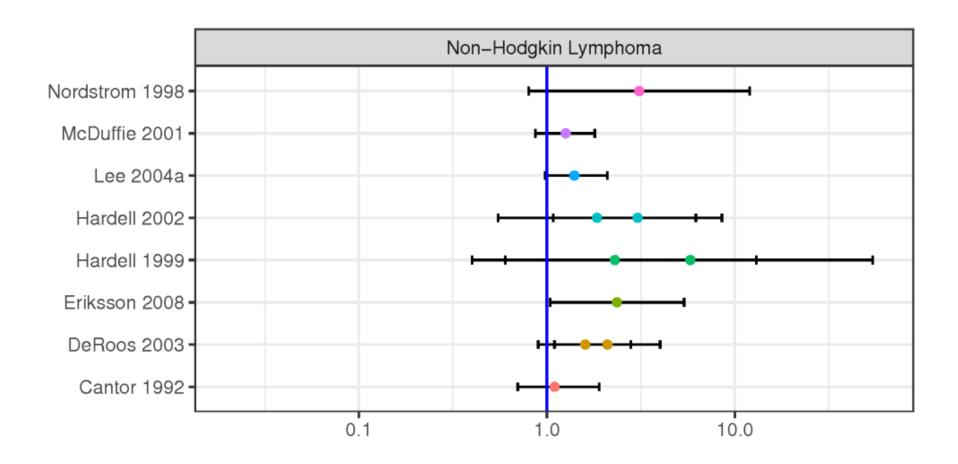
Methods: The AHS is a prospective cohort of licensed pesticide applicators from North Carolina and Iowa. Here, we updated the previous evaluation of glyphosate with cancer incidence from registry linkages through 2012 (North Carolina)/2013 (Iowa). Lifetime days and intensity-weighted lifetime days of glyphosate use were based on self-reported information from enrollment (1993–1997) and follow-up questionnaires (1999–2005). We estimated incidence rate ratios (RRs) and 95% confidence intervals (CIs) using Poisson regression, controlling for potential confounders, including use of other pesticides. All statistical tests were two-sided.

Results: Among 54 251 applicators, 44 932 (82.8%) used glyphosate, including 5779 incident cancer cases (79.3% of all cases). In unlagged analyses, glyphosate was not statistically significantly associated with cancer at any site. However, among applicators in the highest exposure quartile, there was an increased risk of acute myeloid leukemia (AML) compared with never users (RR = 2.44, 95% CI = 0.94 to 6.32,  $P_{trend}$  = .11), though this association was not statistically significant. Results for AML were similar with a five-year (RR<sub>Quartile</sub> 4 = 2.32, 95% CI = 0.98 to 5.51,  $P_{trend}$  = .07) and 20-year exposure lag (RR<sub>Tertile</sub> 3 = 2.04, 95% CI = 1.05 to 3.97,  $P_{trend}$  = .04).

Conclusions: In this large, prospective cohort study, no association was apparent between glyphosate and any solid tumors or lymphoid malignancies overall, including NHL and its subtypes. There was some evidence of increased risk of AML among the highest exposed group that requires confirmation.

#### Glyphosate and Cancer





https://plantoutofplace.com/wp-content/uploads/2018/08/NHL\_casecontrol-1024x512.png

So why then is glyphosate considered to cause cancer?

2015 IARC placed glyphosate into their Group 2A category.

US EPA, EU, Japan, Australia, New Zealand, Canada, WHO, and many other governments do not classify glyphosate as carcinogenic to humans.

Hazard vs Risk



## Hazard vs Risk

#### Banana vs vehicle hazard

- ➤ Both can cause accidents
- ➤ Both pose a hazard

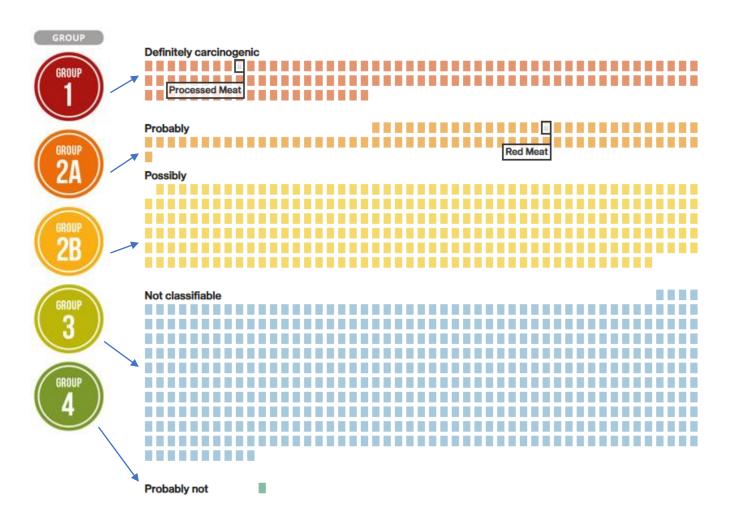


### Banana vs vehicle risk

- Automobile is more risky because you are much more likely to be in a automobile crash than a banana accident.
- ➤ Banana accidents pose less risk.

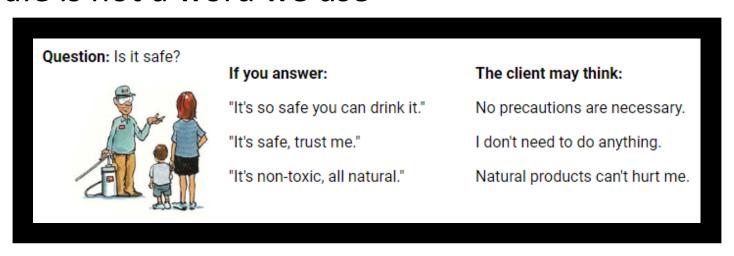


### Sum of IARC's cancer determinations grouped by category



## "Safety" of glyphosate

- No pesticide is without risk
- Safe is not a word we use



## DIY glyphosate?

## The recipe is nearly always a subtle modification of:

- ½ gallon of vinegar
- ½ cup of salt
- 2 tablespoons of dish soap

For example, sodium chloride, one of the ingredients in the homemade herbicide solution, is mutagenic for mammalian somatic cells and bacteria. Another ingredient, acetic acid, is highly corrosive, can aggravate respiratory disorders, and even cause permanent vision loss. Does this sound like something you want to be spraying in the same yard where your children and pets play? Should you be dousing your yard with a potent chemical cocktail that causes mutations in humans and causes blindness? And now we learn that this chemical cocktail is nearly 10 times more lethal to mammals than glyphosate, one of the most potent weed killers on the planet!

| Acute toxicity test            | Glyphosate | Acetic Acid | Salt    |  |  |
|--------------------------------|------------|-------------|---------|--|--|
|                                | (mg/kg)    | (mg/kg)     | (mg/kg) |  |  |
| Rat oral LD <sub>50</sub>      | 5,600      | 3,350       | 3,000   |  |  |
| Rabbit dermal LD <sub>50</sub> | >2,000     | 1,060       | >10,000 |  |  |

One gallon of mixed glyphosate solution contains 31,752 mg glyphosate, or enough to kill 6 rats.

One gallon of the homemade mixture contains 198,200 mg of acetic acid, or approximately enough to kill 59 rats, if administered orally. And this doesn't include the salt.

## References

- <sup>1</sup> Charles M Benbrook. *Impacts of genetically engineered crops on pesticide use in the U.S. -- the first sixteen years*. Environmental Sciences Europe, 2012; 24 (1): 24 DOI: 10.1186/2190-4715-24-24
- <sup>2</sup> S. Parvez, R. R. Gerona, C. Proctor, M. Friesen, J. L. Ashby, J. L. Reiter, Z. Lui and P. D. Winchester. Glyphosate exposure in pregnancy and shortened gestational length: a prospective Indiana birth cohort study. Environmental Health 2018 17:23 DOI: 10.1186/s12940-018-0367-0
- <sup>3</sup> U.S. Department of the Interior | U.S. Geological Survey URL: http://water.usgs.gov/nawqa/ pnsp/usage/maps/show\_map.php?year=2015&map=GLYPHOSATE&hilo=L&disp=Glyphosate Page Contact Information: gs-w nawga whg@usgs.gov Page Last Modified: September 11 2017 13:41:21.

4 https://www.ams.usda.gov/datasets/pdp

<sup>5</sup> https://www.fda.gov/downloads/Food/FoodbornelllnessContaminants/

Pesticides/UCM582721.pdf

<sup>6</sup> Pupke D, Daniel L, Proefrock D (2016) Optimization of an Enrichment and LC-MS/MS Method for the Analysis of Glyphosate and Aminomethylphosphonic Acid (AMPA) in Saline Natural Water Samples without Derivatization. J Chromatogr Sep Tech 7: 338. doi: 10.4172/2157-7064.1000338

<sup>7</sup>Glyphosate detection: methods, needs and challenges" in Environmental Chemistry Letters (Valle,

A.L., Mello, F.C.C., Alves-Balvedi, R.P. et al. Environ Chem Lett (2018).

https://doi.org/10.1007/s10311-018-0789-5

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<sup>10</sup>Gold, Ames, and Slone. 2002. Misconceptions About the Causes of Cancer, Human and Environmental Risk Assessment: Theory and Practice, p 1415-1460.

11 Ames and Gold. 1998. The causes and prevention of cancer: the role of environment. Biotherapy. 11(2-

3), 205-220.

<sup>12</sup> Anand et al. 2008. Cancer is a Preventable Disease that Requires Major Lifestyle Changes. Pharm Res. 25(9) 2097-2116.

# Environmental sampling results for waterbodies

Table 13. Summary of Surface Water Monitoring Data for Glyphosate and AMPA (Data extracted from USCS, CADPR on 1/4/2014).

| USGS, | CADPR | t on 1/4 | 4/2014). |  |
|-------|-------|----------|----------|--|
|       |       |          |          |  |

|                       |                       |            |      | Detection        |                           | aximum<br>tration (µg/L) |            |       |  |
|-----------------------|-----------------------|------------|------|------------------|---------------------------|--------------------------|------------|-------|--|
| Monitoring<br>Program | Watershed<br>Land Use | Analyte    | N    | Frequency<br>(%) | Daily Annual Peak Average |                          | Station ID | State |  |
| USGS                  | All Land Uses         | glyphosate | 1903 | 61               | 73                        | 4.03                     | 7288650    | MS    |  |
| NAWQA                 | All Land Uses         | AMPA       | 1903 | 81               | 28                        | 4.25                     | 7288650    | MS    |  |
|                       | Ag                    | Glyphosate | 574  | 61               | 73                        | 4.03                     | 7288650    | MS    |  |
|                       |                       | AMPA       | 574  | 61               | 28                        | 4.25                     | 7288650    | MS    |  |
|                       | Mixed                 | glyphosate | 677  | 61               | 3.08                      | 0.71                     | 5331580    | MN    |  |
|                       |                       | AMPA       | 677  | 88               | 4.43                      | 1.39                     | 11303500   | CA    |  |
|                       | Urban                 | glyphosate | 351  | 54               | 5.9                       | 0.86                     | 40869415   | WI    |  |
|                       | Orban                 | AMPA       | 351  | 73               | 3.51                      | 1.53                     | 6713500    | CO    |  |
|                       | Other                 | glyphosate | 301  | 72               | 38                        | 4.95                     | 3.3315E14  | MS    |  |
|                       | Other                 | AMPA       | 301  | 88               | 9.74                      | 2.65                     | 3.3315E14  | MS    |  |
| CADPR                 | Not Specified         | Glyphosate | 1908 | 4                | 200                       | 112.5                    | 03_2 (100) | CA    |  |
|                       | Not specified         | AMPA       | 183  | 8                | 4.43                      | 0.54                     | 39 17(103) | CA    |  |

# Environmental sampling results for waterbodies

Table 13. Summary of Surface Water Monitoring Data for Glyphosate and AMPA (Data extracted from USGS, CADPR on 1/4/2014)

| Monitoring | Watershed     |            |      | Detection        |               | aximum<br>tration (µg/L)        |            |       |  |
|------------|---------------|------------|------|------------------|---------------|---------------------------------|------------|-------|--|
| Program    | Land Use      | Analyte    | N    | Frequency<br>(%) | Daily<br>Peak | Arithmetic<br>Annual<br>Average | Station ID | State |  |
| USGS       | All Land Uses | glyphosate | 1903 | 61               | 73            | 4.03                            | 7288650    | MS    |  |
| NAWQA      | All Land Uses | AMPA       | 1903 | 81               | 28            | 4.25                            | 7288650    | MS    |  |
|            | A ~           | Glyphosate | 574  | 61               | 73            | 4.03                            | 7288650    | MS    |  |
|            | Ag            | AMPA       | 574  | 61               | 28            | 4.25                            | 7288650    | MS    |  |
|            | Mixed         | glyphosate | 677  | 61               | 3.08          | 0.71                            | 5331580    | MN    |  |
|            | Mixed         | AMPA       | 677  | 88               | 4.43          | 1.39                            | 11303500   | CA    |  |
|            | Urban         | glyphosate | 351  | 54               | 5.9           | 0.86                            | 40869415   | WI    |  |
|            | Orban         | AMPA       | 351  | 73               | 3.51          | 1.53                            | 6713500    | CO    |  |
|            | Other         | glyphosate | 301  | 72               | 38            | 4.95                            | 3.3315E14  | MS    |  |
|            | Other         | AMPA       | 301  | 88               | 9.74          | 2.65                            | 3.3315E14  | MS    |  |
| CADPR      | Not Specified | Glyphosate | 1908 | 4                | 200           | 112.5                           | 03_2 (100) | CA    |  |
|            | Not specified | AMPA       | 183  | 8                | 4.43          | 0.54                            | 39 17(103) | CA    |  |

RQ > 1 presents increasing risk to organisms

Under most spray scenarios no predicted harm to mammals of any size

| Table 39. Chronic Mammalian Dose-Based RQs for Foliar Application of Glyphosate |           |   |  |                                       |                                       |  |                                     |                                       |  |                                     |   |                              |                |
|---|-----------|---|--|---------------------------------------|---------------------------------------|--|-------------------------------------|---------------------------------------|--|-------------------------------------|---|------------------------------|----------------|
| Food Item   | Rangeland | Roundup ready-aerial, max combined annual | Roundup ready-aerial max rate/crop cycle | Most Crops-aerial max rate/crop cycle | Most crops-aerial max combined annual | Roundup ready ground max rate/crop cycle | Sugar cane-aerial max crop & annual | Tree crops-aerial max combined annual | Roundup ready ground max combined annual | Most crops-ground max crop & annual | Food tree, vine, berry, small fruit ground max<br>combined annual | Forestry, pastures, non-crop | Spot Treatment |
| 15 g Mammal   |           |   |  |                                       |                                       |  |                                     |                                       |  |                                     |   |                              |                |
| Short Grass   | 0.27      | 0.68                                      | 0.62                                     | 0.84                                  | 0.90                                  | 0.96                                     | 1.02                                | 1.03                                  | 1.11                                     | 1.21                                | 1.60  | 2.04                         | 10.2           |
| Tall Grass  | 0.12      | 0.31                                      | 0.28                                     | 0.38                                  | 0.41                                  | 0.44                                     | 0.47                                | 0.47                                  | 0.51                                     | 0.56                                | 0.73  | 0.94                         | 4.68           |
| Broadleaf plants  | 0.15      | 0.38                                      | 0.35                                     | 0.47                                  | 0.51                                  | 0.54                                     | 0.57                                | 0.58                                  | 0.63                                     | 0.68                                | 0.90  | 1.15                         | 5.74           |
| Fruits/pods   | 0.02      | 0.04                                      | 0.04                                     | 0.05                                  | 0.06                                  | 0.06                                     | 0.06                                | 0.06                                  | 0.07                                     | 0.08                                | 0.10  | 0.13                         | 0.64           |
| Arthropods  | 0.10      | 0.27                                      | 0.24                                     | 0.33                                  | 0.35                                  | 0.37                                     | 0.40                                | 0.40                                  | 0.44                                     | 0.48                                | 0.62  | 0.80                         | 4.00           |
| Seeds   | 0.00      | 0.01                                      | 0.01                                     | 0.01                                  | 0.01                                  | 0.01                                     | 0.01                                | 0.01                                  | 0.02                                     | 0.02                                | 0.02  | 0.03                         | 0.14           |
|   |           |   |  | 35 g                                  | Mamn                                  | nal                                      |                                     |                                       |  |                                     |   |                              |                |
| Short Grass   | 0.23      | 0.58                                      | 0.53                                     | 0.71                                  | 0.77                                  | 0.82                                     | 0.87                                | 0.88                                  | 0.95                                     | 1.04                                | 1.36  | 1.74                         | 8.72           |
| Tall Grass  | 0.10      | 0.27                                      | 0.24                                     | 0.33                                  | 0.35                                  | 0.37                                     | 0.40                                | 0.40                                  | 0.44                                     | 0.47                                | 0.62  | 0.80                         | 4.00           |
| Broadleaf plants  | 0.13      | 0.33                                      | 0.30                                     | 0.40                                  | 0.43                                  | 0.46                                     | 0.49                                | 0.50                                  | 0.53                                     | 0.58                                | 0.77  | 0.98                         | 4.90           |
| Fruits/pods   | 0.01      | 0.04                                      | 0.03                                     | 0.04                                  | 0.05                                  | 0.05                                     | 0.05                                | 0.06                                  | 0.06                                     | 0.06                                | 0.09  | 0.11                         | 0.54           |
| Arthropods  | 0.09      | 0.23                                      | 0.21                                     | 0.28                                  | 0.30                                  | 0.32                                     | 0.34                                | 0.35                                  | 0.37                                     | 0.41                                | 0.53  | 0.68                         | 3.41           |
| Seeds   | 0.00      | 0.01                                      | 0.01                                     | 0.01                                  | 0.01                                  | 0.01                                     | 0.01                                | 0.01                                  | 0.01                                     | 0.01                                | 0.02  | 0.02                         | 0.12           |
|   |           |   |  | 1000                                  | g Mam                                 | mal                                      |                                     |                                       |  |                                     |   |                              |                |
| Short Grass   | 0.12      | 0.31                                      | 0.28                                     | 0.38                                  | 0.41                                  | 0.44                                     | 0.47                                | 0.47                                  | 0.51                                     | 0.56                                | 0.73  | 0.93                         | 4.67           |
| Tall Grass  | 0.06      | 0.14                                      | 0.13                                     | 0.18                                  | 0.19                                  | 0.20                                     | 0.21                                | 0.22                                  | 0.23                                     | 0.25                                | 0.33  | 0.43                         | 2.14           |
| Broadleaf plants  | 0.07      | 0.18                                      | 0.16                                     | 0.22                                  | 0.23                                  | 0.25                                     | 0.26                                | 0.27                                  | 0.29                                     | 0.31                                | 0.41  | 0.53                         | 2.63           |
| Fruits/pods   | 0.01      | 0.02                                      | 0.02                                     | 0.02                                  | 0.03                                  | 0.03                                     | 0.03                                | 0.03                                  | 0.03                                     | 0.03                                | 0.05  | 0.06                         | 0.29           |
| Arthropods  | 0.05      | 0.12                                      | 0.11                                     | 0.15                                  | 0.16                                  | 0.17                                     | 0.18                                | 0.19                                  | 0.20                                     | 0.22                                | 0.29  | 0.37                         | 1.83           |
| Seeds   | 0.00      | 0.00                                      | 0.00                                     | 0.01                                  | 0.01                                  | 0.01                                     | 0.01                                | 0.01                                  | 0.01                                     | 0.01                                | 0.01  | 0.01                         | 0.06           |

RQ > 1 presents increasing risk to organisms

Under most spray scenarios no predicted harm to mammals of any size

| Table 39. Chronic Mammalian Dose-Based RQs for Foliar Application of Glyphosate |           |   |  |                                       |                                       |  |                                     |                                       |  |                                     |   |                              |                |
|---|-----------|---|--|---------------------------------------|---------------------------------------|--|-------------------------------------|---------------------------------------|--|-------------------------------------|---|------------------------------|----------------|
| Food Item   | Rangeland | Roundup ready-aerial, max combined annual | Roundup ready-aerial max rate/crop cycle | Most Crops-aerial max rate/crop cycle | Most crops-aerial max combined annual | Roundup ready ground max rate/crop cycle | Sugar cane-aerial max crop & annual | Tree crops-aerial max combined annual | Roundup ready ground max combined annual | Most crops-ground max crop & annual | Food tree, vine, berry, small fruit ground max<br>combined annual | Forestry, pastures, non-crop | Spot Treatment |
| 15 g Mammal   |           |   |  |                                       |                                       |  |                                     |                                       |  |                                     |   |                              |                |
| Short Grass   | 0.27      | 0.68                                      | 0.62                                     | 0.84                                  | 0.90                                  | 0.96                                     | 1.02                                | 1.03                                  | 1.11                                     | 1.21                                | 1.60  | 2.04                         | 10.2           |
| Tall Grass  | 0.12      | 0.31                                      | 0.28                                     | 0.38                                  | 0.41                                  | 0.44                                     | 0.47                                | 0.47                                  | 0.51                                     | 0.56                                | 0.73  | 0.94                         | 4.68           |
| Broadleaf plants  | 0.15      | 0.38                                      | 0.35                                     | 0.47                                  | 0.51                                  | 0.54                                     | 0.57                                | 0.58                                  | 0.63                                     | 0.68                                | 0.90  | 1.15                         | 5.74           |
| Fruits/pods   | 0.02      | 0.04                                      | 0.04                                     | 0.05                                  | 0.06                                  | 0.06                                     | 0.06                                | 0.06                                  | 0.07                                     | 0.08                                | 0.10  | 0.13                         | 0.64           |
| Arthropods  | 0.10      | 0.27                                      | 0.24                                     | 0.33                                  | 0.35                                  | 0.37                                     | 0.40                                | 0.40                                  | 0.44                                     | 0.48                                | 0.62  | 0.80                         | 4.00           |
| Seeds   | 0.00      | 0.01                                      | 0.01                                     | 0.01                                  | 0.01                                  | 0.01                                     | 0.01                                | 0.01                                  | 0.02                                     | 0.02                                | 0.02  | 0.03                         | 0.14           |
|   |           |   |  | 35 g                                  | Mamn                                  | nal                                      |                                     |                                       |  |                                     |   |                              |                |
| Short Grass   | 0.23      | 0.58                                      | 0.53                                     | 0.71                                  | 0.77                                  | 0.82                                     | 0.87                                | 0.88                                  | 0.95                                     | 1.04                                | 1.36  | 1.74                         | 8.72           |
| Tall Grass  | 0.10      | 0.27                                      | 0.24                                     | 0.33                                  | 0.35                                  | 0.37                                     | 0.40                                | 0.40                                  | 0.44                                     | 0.47                                | 0.62  | 0.80                         | 4.00           |
| Broadleaf plants  | 0.13      | 0.33                                      | 0.30                                     | 0.40                                  | 0.43                                  | 0.46                                     | 0.49                                | 0.50                                  | 0.53                                     | 0.58                                | 0.77  | 0.98                         | 4.90           |
| Fruits/pods   | 0.01      | 0.04                                      | 0.03                                     | 0.04                                  | 0.05                                  | 0.05                                     | 0.05                                | 0.06                                  | 0.06                                     | 0.06                                | 0.09  | 0.11                         | 0.54           |
| Arthropods  | 0.09      | 0.23                                      | 0.21                                     | 0.28                                  | 0.30                                  | 0.32                                     | 0.34                                | 0.35                                  | 0.37                                     | 0.41                                | 0.53  | 0.68                         | 3.41           |
| Seeds   | 0.00      | 0.01                                      | 0.01                                     | 0.01                                  | 0.01                                  | 0.01                                     | 0.01                                | 0.01                                  | 0.01                                     | 0.01                                | 0.02  | 0.02                         | 0.12           |
|   |           |   |  | 1000                                  | g Mam                                 | mal                                      |                                     |                                       |  |                                     |   |                              |                |
| Short Grass   | 0.12      | 0.31                                      | 0.28                                     | 0.38                                  | 0.41                                  | 0.44                                     | 0.47                                | 0.47                                  | 0.51                                     | 0.56                                | 0.73  | 0.93                         | 4.67           |
| Tall Grass  | 0.06      | 0.14                                      | 0.13                                     | 0.18                                  | 0.19                                  | 0.20                                     | 0.21                                | 0.22                                  | 0.23                                     | 0.25                                | 0.33  | 0.43                         | 2.14           |
| Broadleaf plants  | 0.07      | 0.18                                      | 0.16                                     | 0.22                                  | 0.23                                  | 0.25                                     | 0.26                                | 0.27                                  | 0.29                                     | 0.31                                | 0.41  | 0.53                         | 2.63           |
| Fruits/pods   | 0.01      | 0.02                                      | 0.02                                     | 0.02                                  | 0.03                                  | 0.03                                     | 0.03                                | 0.03                                  | 0.03                                     | 0.03                                | 0.05  | 0.06                         | 0.29           |
| Arthropods  | 0.05      | 0.12                                      | 0.11                                     | 0.15                                  | 0.16                                  | 0.17                                     | 0.18                                | 0.19                                  | 0.20                                     | 0.22                                | 0.29  | 0.37                         | 1.83           |
| Seeds   | 0.00      | 0.00                                      | 0.00                                     | 0.01                                  | 0.01                                  | 0.01                                     | 0.01                                | 0.01                                  | 0.01                                     | 0.01                                | 0.01  | 0.01                         | 0.06           |

Roundup ready ground max combined annual Food tree, vine, berry, small fruit ground max Roundup ready-aerial, max combined annual Roundup ready ground max rate/crop cycle Most crops-aerial max combined annual Free crops-aerial max combined annual Most crops-ground max crop & annual Most Crops-aerial max rate/crop cycle Sugar cane-aerial max crop & annual Forestry, pastures, non-crop combined annual Spot Treatment Rangeland Roundup ready-aerial Food Item 15 g Mammal 10.2 0.68 0.62 0.84 0.90 0.96 1.03 1.21 1.60 2.04 **Short Grass** 1.02 1.11 0.47 4.68 0.47 0.51 0.56 0.73 0.31 0.28 0.38 0.41 0.44 0.94 Tall Grass 0.12 0.58 5.74 Broadleaf plants 0.47 0.51 0.54 0.68 0.90 1.15 0.15 0.38 0.35 0.63 0.06 0.07 0.08 0.64 Fruits/pods 0.02 0.04 0.04 0.05 0.06 0.06 0.06 0.10 0.13 4.00 Arthropods 0.10 0.27 0.24 0.33 0.35 0.37 0.40 0.40 0.48 0.62 0.80 0.01 0.02 0.14 0.01 0.01 0.01 0.01 0.01 0.01 0.02 0.03 Seeds 0.00 35 g Mammal 8.72 0.88 1.36 Short Grass 0.58 0.53 0.71 0.82 0.87 0.95 1.04 1.74 0.23 0.77 0.62 4.00 Tall Grass 0.10 0.27 0.24 0.33 0.35 0.37 0.40 0.40 0.44 0.47 0.80 0.77 **Broadleaf plants** 0.13 0.33 0.30 0.40 0.43 0.46 0.49 0.50 0.53 0.58 0.98 4.90 0.54 Fruits/pods 0.03 0.04 0.05 0.05 0.05 0.06 0.06 0.06 0.09 0.11 0.01 0.04 3.41 0.35 0.41 0.53 Arthropods 0.09 0.23 0.21 0.28 0.30 0.32 0.34 0.37 0.68 0.01 0.01 0.01 0.02 0.12 0.00 0.01 0.01 0.01 0.01 0.01 0.01 0.02 Seeds 1000 g Mammal 4.67 0.12 0.31 0.28 0.47 0.73 0.93 0.38 0.41 0.44 0.47 0.51 0.56 Short Grass 2.14 0.13 0.21 0.43 0.22 0.25 0.33 0.06 0.14 0.18 0.19 0.20 0.23 2.63 0.18 0.16 **Broadleaf plants** 70.0 0.22 0.23 0.25 0.26 0.27 0.29 0.31 0.41 0.53 0.29 0.02 0.03 0.06 0.05 Fruits/pods 0.01 0.02 0.02 0.03 0.03 0.03 0.03 0.03 1.83 0.11 0.19 0.20 0.37 0.05 0.12 0.15 0.16 0.17 0.18 0.22 Arthropods

0.00

0.01

0.01

0.00

0.00

Seeds

0.01

0.01

0.01

Includes Right-of-way

0.06

0.01

Table 39. Chronic Mammalian Dose-Based RQs for Foliar Application of Glyphosate

RQ > 1 presents increasing risk to organisms

Under most spray scenarios no predicted harm to mammals of any size

## Glyphosate: scientific consensus

#### vs the French media



Analysis by ChèvrePensante.fr

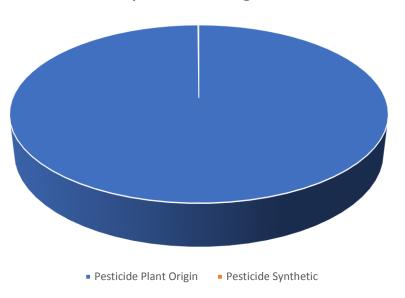
English infographic by



## And coffee contains pesticides?

- 99.9% of all pesticides are naturally occurring in the foods we eat<sup>10</sup>
  - Plants are in the business of protecting their tissues
- Only a small number of naturally occurring pesticides have been tested; roughly 50% were mutagenic.

Dietary pesticides by plant or synthetic origin.



Our diet includes roughly 1,500 mg of naturally occurring pesticides daily.

... how do we not die?

Our diet includes roughly 1,500 mg of naturally occurring pesticides daily.

... how do we not die?

Figure 3. Phase I and II Liver Detoxification

