

June 5, 2019

OPP Docket, Environmental Protection Agency Docket Center (EPA/ DC), (28221T)
1200 Pennsylvania Ave., NW
Washington, DC 20460-0001
Submitted Via [http:// www.regulations.gov](http://www.regulations.gov)

Re: Petition to Modify the Tolerance and Product Labels for Glyphosate with Regard to Oats;
Docket No. EPA-HQ-OPP-2019-0066.

To Whom It May Concern:

The Joint Glyphosate Task Force (JGTF) appreciates the opportunity to provide comments regarding the Environmental Working Group (EWG) Petition to EPA to reduce the glyphosate tolerance in or on oats from 30ppm to 0.1ppm and modify label to prohibit preharvest use on oats [Docket ID No. EOA-HQ-OPP-2019-0066].

Glyphosate based products are used by farmers, land managers and gardeners to safely and effectively control the unwanted vegetation in agricultural and non-agricultural settings. This broad adoption is due to glyphosate's ability to control a broad spectrum of weeds, many economic and environmental benefits and its strong safety profile. Glyphosate has more than a 40-year history of safe use and it is supported by one of the most extensive human health, safety and environmental databases ever compiled for a pesticide product. In the environment, glyphosate binds tightly to soil, degrades over time and does not accumulate in the food chain. It has low toxicity to humans and non-plant wildlife, over both short- and long- term exposures. It is not a reproductive toxicant, nor an endocrine disruptor. There is no evidence of neurotoxicity or immunotoxicity. The JGTF agrees with the EPA's most recent conclusion as presented in the Proposed Interim Decision (April 2019), which states that glyphosate is "not likely to be carcinogenic to humans". In the Proposed Interim Decision, the agency also concludes "The EPA thoroughly assessed risks to humans from exposure to glyphosate from all uses and all routes of exposure and did not identify any risks of concern". EPA also states that agency's cancer classification is based on a thorough weight-of-evidence review of all relevant data and that its process is both more robust and more transparent than IARC's evaluation. This conclusion is consistent with other global regulatory authorities and international organizations, including the Canadian Pest Management Regulatory Agency, the Australian Pesticide and Veterinary Medicines Authority, the European Food Safety Authority, the European Chemicals Agency, the German Federal Institute for Occupational Safety and Health, the Joint FAO/WHO Meeting on Pesticides Residues, the New Zealand Environmental Protection Authority, the Korean RDA and the Food Safety Commission of Japan.

As a nonselective herbicide, Glyphosate is currently registered for pre- and post-emergence applications in the US. However, specific to use in oats and the Environmental Working Group's petition requesting that the U.S. EPA ban pre-harvest use of glyphosate on oats; the pre-harvest use on oats is not a registered use in the United States. And when it comes to allowable human exposures, the limits set by EPA are 100 times below levels shown to have no negative effect in safety studies. The current tolerance for oats does not result in human exposures greater than EPA's established exposure limits and therefore does not pose a safety concern.

The glyphosate residue levels claimed by EWG are not even remotely close to any level of public health concern. Even at the highest level reported by the EWG (1,300 ppb), an adult would have to eat 118 pounds of the food item every day for the rest of their life to reach the chronic reference dose set by EPA.

The JGTF supports the comprehensive and science-based processes used by EPA to ensure glyphosate can be used safely and again, appreciates the opportunity to provide comments in regard to this petition.