

Chairman Barve and Members of the Environment & Transportation Committee,

For over 40 years the National Association of Landscape Professionals (NALP) has represented tens of thousands of certified professional pesticide applicators across the United States. Tasked with providing plant health services to millions of residential and commercial clients, the core values of our association include advocating on behalf of our members as to the benefits of healthy plants in our landscapes, fostering the highest standards of professionalism, and educating both our members and the public in caring for their landscapes in an environmentally responsible way.

We are writing today to express our opposition to House Bill 472, a bill which will ban the use of a popular herbicide in the State of Maryland. Glyphosate is the active ingredient in the herbicide Roundup™ and has been available on store shelves since its introduction in the early 1970's. We are alarmed that the state would contemplate this type of decision placing it in conflict with those regulatory entities with the expertise to make decisions on the safe use of pesticides, namely the Maryland Department of Agriculture and the U.S. Environmental Protection Agency.

Ensuring the safety, health and well-being of our members, customers, the public and the environment is the top priority of NALP. Our association fully supports documented research conducted by regulatory bodies and the established framework for the regulation of pesticides in the United States through the Federal Insecticide Fungicide and Rodenticide Act (FIFRA), and we continually and closely monitor for regulatory and research developments.

FIFRA prescribes and implements a robust federal and state pesticide registration and review process. NALP believes this process is the foundation for our industry to responsibly manage landscapes using federally and state approved pesticides. We rely on our regulators, as the experts, to make sound scientific decisions on pesticide registration approvals. The EPA and the 50-state pesticide lead regulatory agencies are our pesticide regulators, and the landscape industry will continue to comply with all federal and state laws and regulations that is supported by the review processes, science, evaluations, decisions, and enforcement pursuant to FIFRA.

Recently, controversy has sprung up around this previously innocuous product with claims that it causes cancer in human beings, specifically non-Hodgkin's lymphoma. Not a day goes by without a television or on-line advertisement from a law firm making claims and offering high cash payouts if you or a loved one had used Roundup in the past. These ads use hyperbolic photographs of people making pesticide applications of some sort, usually depicting glyphosate being misused in a manner completely contrary to label directions to stoke fear with the public.

There is a very vocal minority of people who at their core disapprove of all pesticides regardless of how beneficial those pesticides are to man or the environment. Not satisfied with the exhaustive research that goes into approving pesticides before they are available for sale, activists turn to lawmakers and make claims demanding immediate action as if an established, rigorous evaluation process for pesticide products does not exist.

We caution you to carefully listen to both sides of this argument critically.

A leading cancer epidemiologist has taken a special interest in the claim that glyphosate is carcinogenic, and offers his opinion in this recent article:

*“In the case of glyphosate, 40 years of science demonstrating the safety of the chemical is quite consistent and is supported not only by industry-affiliated scientists but by independent scientists, including agricultural experts, toxicologists, and regulatory officials who are familiar with pesticide use, as evidenced by the fact that so many regulatory bodies worldwide are in agreement. Why, then, are the attacks on glyphosate in courtrooms and governments succeeding?”<sup>1</sup>*

The US Environmental Protection Agency is responsible for the regulation of pesticides at the federal level, while the Maryland Department of Agriculture performs similar duties at the state level. This is our business – we know and interact with those responsible for regulating pesticides and trust their judgement.

The underlying premise that glyphosate is unsafe is belied by the voluminous research data demonstrating the product’s safety. A long-term study, a collaborative effort involving investigators from National Cancer Institute, the National Institute of Environmental Health Sciences, the Environmental Protection Agency, and the National Institute for Occupational Safety and Health, of over 89,000 farmers and their spouses in Iowa and North Carolina reviewed data related to glyphosate usage by participants in their study. Regarding non-Hodgkin’s lymphoma specifically, the Agricultural Health Study stated:

*“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.”<sup>2</sup>*

In response to numerous lawsuits and marketing campaigns to sway public opinion against this product, the US EPA recently made this statement:

*“EPA continues to find that there are no risks to public health when glyphosate is used in accordance with its current label and that glyphosate is not a carcinogen”<sup>3</sup>*

Health Canada has also stated that glyphosate is not carcinogenic:

*“After a thorough scientific review, we have concluded that the concerns raised by the objectors could not be scientifically supported when considering the entire body of relevant data. The objections raised did not create doubt or concern regarding the scientific basis for the 2017 re-evaluation decision for glyphosate. Therefore, the Department’s final decision will stand.*

*Health Canada follows a transparent and rigorous science-based regulatory process when making decisions about the safety of pesticides. As part of this process, Health Canada will publish its response to each notice of objection in the Pest Management Regulatory Agency’s Public Registry on January 14.*

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<sup>1</sup> <https://issues.org/whos-afraid-of-roundup/>

<sup>2</sup> <https://www.ncbi.nlm.nih.gov/pubmed/29136183>

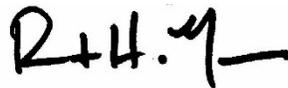
<sup>3</sup> <https://www.epa.gov/newsreleases/epa-takes-next-step-review-process-herbicide-glyphosate-reaffirms-no-risk-public-health>

*Our scientists left no stone unturned in conducting this review. They had access to all relevant data and information from federal and provincial governments, international regulatory agencies, published scientific reports and multiple pesticide manufacturers. This includes the reviews referred to in the Monsanto Papers. Health Canada also had access to numerous individual studies and raw scientific data during its assessment of glyphosate, including additional cancer and genotoxicity studies. To help ensure an unbiased assessment of the information, Health Canada selected a group of 20 of its own scientists who were not involved in the 2017 re-evaluation to evaluate the notices of objection.*

*No pesticide regulatory authority in the world currently considers glyphosate to be a cancer risk to humans at the levels at which humans are currently exposed. We continue to monitor for new information related to glyphosate, including regulatory actions from other governments, and will take appropriate action if risks of concern to human health or the environment are identified.”<sup>4</sup>*

Glyphosate is an enormously beneficial tool for agriculture, allowing farmers of many different crops to practice no or low-till practices that reduce soil erosion, reduce overall pesticide inputs, lower greenhouse gas emissions, among others. While the green industry does indeed use glyphosate in limited circumstances, we feel strongly that decisions regarding pesticides are correctly left to the expertise of the regulatory community.

Respectfully Submitted,



Robert H. Mann  
Director of State & Local Government Relations

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<sup>4</sup> <https://www.canada.ca/en/health-canada/news/2019/01/statement-from-health-canada-on-glyphosate.html>