

Attachment 1: During application for "Pesticide Registration" for Roundup in 1988, Monsanto cheated the Chinese government and the Chinese people!

1. Among the large scale GM crops, 84% are glyphosate-tolerant crops containing glyphosate residues!

From International Online reports [1], "Among these crops, 57% are glyphosate-tolerant GM crops, 16% are insect-resistance GM maize and cotton, another 27% are multiple-stack GM with both these traits."

This means, the glyphosate-tolerant GM crops, sprayed with glyphosate-based herbicides and containing glyphosate residues, account for 84% of GM crops grown worldwide.

[1] International Online (Beijing), Argentina has become the world's third largest GM crop growing nation, 2014-10-11

<http://world.people.com.cn/n/2014/1011/c157278-25812909.html>

2. Glyphosate-tolerant GM soybean, with glyphosate residues, is the GM ingredient consumed the most by Chinese consumers.

For a number of years, China has annually imported over 50 - 70 million tons of glyphosate-tolerant GM soybeans. Most are first chemically extracted into GM soybean food oil and its byproduct, soybean meal. The GM soybean meal is partly processed into animal feed, and partly into chemically extracted GM soybean protein powder, which is then added to sausages, ham, frozen food, soybean milk powder, biscuits, cakes, bread, and even added to wheat flour and infant formula milk powder.

In addition, GM soybean ingredients have been tested and glyphosate residues have been detected in soy sauce, soy paste, Tofu etc. Soybeans

and soy products are the GM ingredient consumed the most by Chinese consumers.

3. In addition to GM fragments, the glyphosate residue contained in GM soybeans is the ingredient causing major harm to human health.

Many more studies reveal harm caused by glyphosate residue to animal/human health, although a few studies reveal that GM fragments also cause harm to animal/human health.

From what has been discussed above:

1) Among the harm caused by GM food ingredients to the health of Chinese consumers, the glyphosate residue contained in the glyphosate-tolerance soybeans causes the greatest harm!

2) Accordingly, to examine the greatest harm caused by GM food to the Chinese consumers, shouldn't the truth about how Monsanto's Roundup herbicide obtained its "pesticide registration" in 1988 in China be clarified, and the truth about how Monsanto's RR soybean 40-3-2 and maize NK603 obtained their "safety certificate" from the Chinese Ministry of Agriculture?

4. During application for "Pesticide Registration" for Roundup in 1988, Monsanto cheated the Chinese government and the Chinese people!

农业部信息公开申请答复书

农公开(农)[2014]8号

杨晓陆、李香珍、田香萍：

你们于2014年3月11日提交的关于孟山都草甘膦除草剂“农达”毒理学试验报告的政府信息公开申请收悉。现答复如下。

草甘膦除草剂“农达”毒理学试验报告结果我部已于2014年2月25日依法向你们公开(农公开(农)[2014]4号)。草甘膦除草剂“农达”毒理学试验报告原件因涉及孟山都公司商业秘密,我部根据《中华人民共和国政府信息公开条例》第二十三条的规定,发函征求了孟山都公司意见。近日,孟山都远东有限公司北京代表处复函认为,草甘膦除草剂毒理学实验报告系该公司重要的商业秘密,含有重要的个人隐私以及商业保密信息,该公司在全球范围内从未向公众公开过,不同意公开该报告。根据《中华人民共和国政府信息公开条例》第十四条第四款、第二十三条的规定,不予公开你们申请的政府信息。

特此函复。



The “Ministry of Agriculture Information Disclosure Application Response” dated June 4, 2014 argued: The glyphosate-herbicide Roundup toxicology test report cannot be disclosed because it involves Monsanto's commercial secrets, ... the Monsanto Far East Company Ltd. Beijing Representative Office responded by letter with the opinion, that the glyphosate-herbicide Roundup test report is an important commercial secret of this company, it contains important individual privacy and commercial confidential information which has never been disclosed to the public anywhere in the world, therefore they do not agree to disclose this report. ... Per the regulations of Clause 14 Point 4, Clause 23, we will not disclose the governmental information you have requested to disclose.

4.1 Monsanto, in 1988 when it applied for "Pesticide Registration" for Roundup in China, it purposely did not inform the Ministry of Agriculture that the US EPA already classified glyphosate as possibly carcinogenic to humans (Group C) in 1985.

(1) The "Pesticide Registration Regulation" of China requires applicants to provide "test results of teratogenic, carcinogenic and mutagenic" potential.

- The Ministry of Agriculture, Ministry of Forestry, Ministry of Chemical Industry, Ministry of Health, Ministry of Commerce, State Council Environment Protection Leading Group announced the notification for the "Pesticide Registration Regulation" (April 10, 1982) attached with the regulation.
- "Article 5. When applying for agricultural pesticide registration, applicant must provide the following materials and samples. ... 5. Toxicity: "test results for acute, semi-acute, chronic toxicity and for teratogenic, carcinogenic and mutagenic."

(2) According to the conclusions of the toxicology animal test reports submitted by Monsanto when it applied for "pesticide registration" for glyphosate-based herbicide Roundup in 1988, the Ministry of Agriculture concluded that Roundup was "not carcinogenic, mutagenic and teratogenic."

The "Ministry of Agriculture Information Disclosure Application Response" dated July 28, 2014 confirmed that Monsanto's Roundup:

- **"carcinogenic, mutagenic and teratogenic" tests result indicates that this product is "not carcinogenic, mutagenic and teratogenic."**

(3) US EPA had listed glyphosate as possibly carcinogenic to humans (Group C) in 1985.

US EPA: "On February 11, 1985, the carcinogenic potential of glyphosate was first considered by a panel (then called the Toxicology Branch of the Hazard Evaluation Division). The Committee, in a consensus review dated March 4, 1985, classified glyphosate as a Group C carcinogen based on an increased incidence of renal tubular adenomas in male mice."

Evidence: EPA official website official document "Toxicology Branch -- Health Effects Division: 1991 Second Peer Review of Glyphosate, Oct. 30, 1991".
http://www.epa.gov/opp00001/chem_search/cleared_reviews/csr_PC-103601_30-Oct-91_265.pdf

This proves:

1) In 1988, when Monsanto applied for "Pesticide Registration" for Roundup in China, it purposely did not inform the Ministry of Agriculture that the US EPA already classified glyphosate as possibly carcinogenic to humans (Group C) in 1985.

2) The toxicology animal test reports submitted by Monsanto did not describe the carcinogenic aspect of glyphosate.

4.2 In 1988, when Monsanto applied for "Pesticide Registration" for Roundup in China, it purposely did not provide long-term, whole-life and three-generation toxicology animal test reports which disclosed the carcinogenic aspect of glyphosate.

The EPA archived documents available to the public lists three long-term studies which revealed the **carcinogenic aspect of glyphosate:**

1) "A Three-Generation Reproduction Study in Rats with Glyphosate (Final Report; Bio/dynamics Project No.77-2063; March 31, 1981)

- 2) Lankas, G. P. December 23, 1981. A Lifetime Study of Glyphosate in Rats. Unpublished report No. 77-2062 prepared by BioDynamics)
- 3) Hogan, G. K. (1983). A chronic feeding study of glyphosate in mice. Unpublished report prepared by Bio/Dynamics Inc., dated July 21, 1983. Report No. 77-2061. EPA Acc. Nos. 251007 - 251009, and 251014.

Evidence:

- (1) 1986-03-01 "Glyphosate Registration Standard Revision"
<http://www.epa.gov/pesticides/chemicalsearch/chemical/foia/cleared-reviews/reviews/103601/103601-210.pdf>
- (2) EPA July 22 1992 glyphosate herbicide "pesticide registration" reexamination document
http://www.epa.gov/pesticides/chem_search/cleared_reviews/csr_PC-103601_22-Jul-92_272.pdf

4.3 In 1988, when Monsanto applied for "Pesticide Registration" for Roundup in China, it purposely submitted a Roundup "toxicology test report issued by Younger Laboratories on Dec. 23, 1985" which is seriously suspected from the date, to signature to content, are all outright fraud.

- The "Ministry of Agriculture Information Disclosure Application Response" dated Feb 25, 2014 confirmed:
- Monsanto glyphosate-herbicide Roundup in 1988 obtained formal registration in China, registration certificate No. PD73-88. According to the concurrent registration rule, the company provided a toxicology test report issued on Dec. 23, 1985 by Younger Laboratories of USA (Address: 123 CLIFF CAVE ROAD BAIN T LOUIS, Mo. 63129, phone: 314-487-6661).
 - The test report result indicates, Roundup administered to rats via acute

oral is LD50>5000m/kg, to domestic rabbit acute by skin
LD50>5000mg/kg, with no stimulation or sensitization to rabbit's eyes
and skin.

Main points:

- 1) "a toxicology test report issued on Dec. 23, 1985 by Younger Laboratories of USA"
- 2) "The test report result indicates, Roundup to large rats ... to domestic rabbit ... ";
- 3) "acute oral administration to rats results in LD50>5000m/kg, to domestic rabbit acute by skin LD50>5000mg/kg"

But:

- 1) Among the EPA archive concerning glyphosate/Roundup, toxicology animal test reports by Younger Laboratory only include 1970, 1973 and 1975, there does not exist such a report issued on Dec. 23, 1985.
- 2) Among the glyphosate/Roundup safety evaluations documents archived by EPA in 1986, 1991 and 1992, as well as among the safety evaluation documents on glyphosate by UN WHO in 1994, there also does not exist such a report issued on Dec. 23, 1985.

Evidence:

- (1) 1986-03-01 "Glyphosate Registration Standard Revision"
<http://www.epa.gov/pesticides/chemicalsearch/chemical/foia/cleared-reviews/reviews/103601/103601-210.pdf>
- (2) EPA 1992-07-22 glyphosate herbicide "pesticide registration" reexamination document
http://www.epa.gov/pesticides/chem_search/cleared_reviews/csr_PC-103601_22-Jul-92_272.pdf
- (3) EPA Reregistration Eligibility Decision (RED) Glyphosate
http://www.epa.gov/opp00001/chem_search/reg_actions/reregistration/red_PC-41730_0_1-Sep-93.pdf

(4) An independent study by international group of experts organized in 1994 by the United Nations Environment Programme, the International Labour Organisation, or the World Health Organization.

<http://www.inchem.org/documents/ehc/ehc/ehc159.htm#SectionNumber:7.3>

4.4 The content of the toxicology test report "issued on Dec. 23, 1985 by Younger Laboratories of USA" claimed by Monsanto is highly consistent with the parameters announced by the Ministry of Agriculture on glyphosate safety.

<p>Ministry of Agriculture official website "GMO Authoritative Attention" column "Regarding the glyphosate residue limit standard for soybeans":</p> <ul style="list-style-type: none"> ● Glyphosate to large rats acute via oral is LD50>5000 (mg/kg), to domestic rabbit skin with no stimulation or sensitization to rabbit's eyes and skin. Within test dosage range, accumulation toxicity, carcinogenic, mutagenic and teratogenic was not found in test animals. 	<p>"The glyphosate herbicide Roundup toxicology animal test report issued on Dec. 23, 1985 by Younger Laboratories of USA" claimed by Monsanto states:</p> <ul style="list-style-type: none"> ● Roundup to large rats acute via oral is LD50>5000m/kg, to domestic rabbit acute by skin LD50>5000mg/kg, with no stimulation or sensitization to rabbit's eyes and skin.
<p>Evidence Ministry of Agriculture official website "GMO Authoritative Attention" column "Regarding the glyphosate residue limit standard for soybeans" http://www.moa.gov.cn/ztzl/zjyqwgz/zxjz/201109/t20110919_2290532.htm</p>	<p>The "Ministry of Agriculture Information Disclosure Application Respond" dated July 28, 2014 confirmed on Monsanto's Roundup: The "carcinogenic, mutagenic and teratogenic" tests result indicates that this product is "not carcinogenic, mutagenic and teratogenic".</p>