

Message

**From:** MARTENS, MARK A [FND/5045] [/O=MONSANTO/OU=EA-5040-01/CN=RECIPIENTS/CN=21606]  
**Sent:** 9/6/1999 8:23:05 AM  
**To:** WRATTEN, STEPHEN J [FND/1000] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=119523]; FARMER, DONNA R [FND/1000] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=180070]  
**CC:** KIER, LARRY D [NCP/1000] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=33322]; HEYDENS, WILLIAM F [FND/1000] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=230737]; GRAHAM, WILLIAM [FND/5040] [/O=MONSANTO/OU=EA-5430-01/CN=RECIPIENTS/CN=233911]  
**Subject:** RE: Comments on Parry write-up

Steve,

Yes it doesn't show as a report in its definitive form. I don't think that it was Parry's intention to write up a ready-to-use document for regulatory and other defense, this report only reflects his opinion on three things which were asked and these were the quality of the data, the evaluation of the mutagenicity and its significance for man and recommendations to complete the picture. He received all reports we produced and those we obtained from competing companies and all scientific papers.

We can now determine for ourselves how such a report should look like and give him directions for a rewrite. The best way to do this is first collect all our comments and arrange a visit what actually the action is that we decided during our last meeting. See further my comments in the text below in italic. I'll send you all my comments on Parry's paper very soon.

Regards, Mark

-----Original Message-----

**From:** WRATTEN, STEPHEN J [FND/1000]  
**Sent:** Wednesday, September 01, 1999 12:17 AM  
**To:** MARTENS, MARK A [FND/5045]; FARMER, DONNA R [FND/1000]  
**Cc:** KIER, LARRY D [NCP/1000]; HEYDENS, WILLIAM F [FND/1000]; GRAHAM, WILLIAM [FND/5040]  
**Subject:** Comments on Parry write-up

Mark and Donna

I was somewhat disappointed in the Parry report, not particularly from his conclusions but just the way they're presented. The style and rather casual lack of completeness and preciseness would make it hard to circulate this around to anyone as supporting information. Has he ever worked with industry before on this sort of project?--*I know that he is regularly consulted by BAA and Dow--*

I will mail the marked-up paper back to you, but some other general comments need to be made:

1. It is odd that the one study by BioAgri is discussed right on the first page in rather extensive detail but none of the others are. I understand that he didn't like this one, but it is still strange to read this way.--*he decided to only expand on the studies for which he had comments, this can be taken care of in write up of definitive report--*
2. The whole report could benefit from a couple of introductory paragraphs about what he was asked to do and what he received as far as reports. Did he have all the Monsanto reports as well as the literature articles? Was he asked to compare these, evaluate the methods, explain the differences, identify any faults, or what?--*Yes all these things were asked, but Parry was under time pressure and produced a paper which expressed his opinion, he did not get detailed instructions on how to produce a report, that is normally at the discretion of the expert, but all this can be put in a better form.-- To be honest I expected to receive a better structured report myself--*
3. Some where the report needs to identify the full citations of each report evaluated and give the full Literature references for the public documents. Also the test material should be clearly identified, ideally by both MON number and brand name if needed, but at least to say which are glyphosate and which are formulations - this is done, sort of, but not as clearly as I'd like. Separate tables would be good.--*Yes, this should be done. parry receive from me all the details on composition and signed off a secrecy agreement-- We may have to help him to write all this up in a proper way--*

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4. He has an odd way of starting all conclusions with a negative - ie., points 2, 3, and 4 on page 3. Couldn't the sentence structure be modified to be less awkward? When he says "no data were provided..." time and again, it makes it sound as though he was suspicious that there were data but he didn't get them. I know this is not the intent, but it could be cleaned up.--Yes--

5. Table 1 seems to state repeatedly that "there was no evidence of xxx mutagenicity". It would be more powerful if it said "there was convincing evidence that glyphosate does not act as a xxx mutagen". "no evidence of" is a very weak way of stating a conclusion.--*We can bring this up in a meeting with him--*

6. He says very little about the literature reports. So little that one almost forgets about them. Can he not provide some critique about their quality and methodology as compared to the Monsanto reports? Are they included in or excluded from the statement in the first paragraph sentence "these studies were performed to a high standard and to OECD recommended guidelines"? In the section entitled "Assessment of the published..." on p. 2. I am hard-pressed to find any assessment. It is almost merely a listing of what everyone already knew from casually reading the abstract.--*Yes we will have to discuss this with him at a meeting--*

7. In his conclusions (p. 2), do the "studies evaluated" (line 2) include the literature reports or not? IN other words, is he saying that none of the studies (Monsanto plus literature) had evidence of glyphosate genotoxic potential, or is he limiting this conclusion to the Monsanto studies?--*Will have to be discussed with him--*

8. Of course we know there were no data of the type listed in points 2, 3, and 4 on p. 3. We didn't need him to tell us that. The key point is whether the conclusions of Bolognesi, and Rank can be discounted on the basis of the strength and number of studies at hand, or whether their experiments need to be repeated independently to credibly refute the findings. Of course we knew that the latter would be the most convincing approach, but we need him to make any arguments that can be made on the data we have.

Overall, I guess we have his recommendation of studies that could be used to strengthen the database on p. 4. , but that is about it. I do not see that he has stuck his neck out on anything at all controversial, and therefore, there is little value in the write-up as written that could be useful. Hope it didn't cost much. Perhaps this is too harsh, and I don't know what your proposal to him was, but I guess I would expect more than this of a Professor.--*Please don't be too negative, it is clear that he will need some help to produce the definitive report without twisting his arms, don't forget that his opinion is well respected and I am sure he didn't have the time to write it all down as should have been the case, therefore the need to meet with him. I wrote him a note that we are reviewing his paper and that Larry will contact him soon for a meeting in person--*

Steve

*Steve Whattier*

REDACTED (voice)

REDACTED (fax)