

FINAL SHOWN

Grant, Hugh 02-04-2019

[REDACTED]

Total Time 00:21:22



Page/Line	Source	ID
7:12 - 7:15	Grant, Hugh 02-04-2019 (00:00:04)	HG2_COMBINED_06.1
	7:12 Q. Good afternoon, Mr. Grant.	
	7:13 A. Good afternoon, sir.	
	7:14 Q. How are you, sir?	
	7:15 A. I'm very well.	
8:7 - 8:16	Grant, Hugh 02-04-2019 (00:00:17)	HG2_COMBINED_06.2
	8:7 Q. Now, you used to work for the Monsanto	
	8:8 Corporation?	
	8:9 A. I did.	
	8:10 Q. And tell us what -- you were the chief	
	8:11 executive officer and a member of the board of	
	8:12 directors?	
	8:13 A. I was chief executive officer and chairman	
	8:14 of the board.	
	8:15 Q. And I'm sorry?	
	8:16 A. And chairman of the board.	
9:5 - 9:12	Grant, Hugh 02-04-2019 (00:00:23)	HG2_COMBINED_06.3
	9:5 Q. And so you were the chairman of the board	
	9:6 and the chief executive officer. Chief executive	
	9:7 officer is the person in charge of the corporation	
	9:8 operations on a day-to-day basis; is that fair?	
	9:9 A. Yeah -- not just day-to-day. The chief	
	9:10 operating officer is really working day-to-day, but I	
	9:11 was responsible for the operations and the long range	
	9:12 business as well.	
10:1 - 10:5	Grant, Hugh 02-04-2019 (00:00:12)	HG2_COMBINED_06.4
	10:1 Q. And this is a worldwide company, Monsanto;	
	10:2 right?	
	10:3 A. Yeah, we were most -- yes, we were most	
	10:4 places agriculture was, so we operated around the	
	10:5 world.	
13:20 - 14:1	Grant, Hugh 02-04-2019 (00:00:17)	HG2_COMBINED_06.5
	13:20 Now, as the chief executive officer for 15	
	13:21 years of this company, Monsanto, you and I can agree	
	13:22 that if a company knew about a potential health risk of	
	13:23 a product that it was selling, it would have an	
	13:24 obligation to warn consumers?	
	14:1 That's fair, isn't it?	
14:4 - 14:12	Grant, Hugh 02-04-2019 (00:00:37)	HG2_COMBINED_06.6
	14:4 A. Yes, it's hard to speculate -- what I can	

14:5 tell you is that -- and it's not unique to Monsanto.
 14:6 It's not unique to our products. We operate in a
 14:7 regulatory environment where during that 15-year period
 14:8 there -- in fact, I mean, when you think about it, for
 14:9 40 years, these products were constantly -- somewhere
 14:10 in the world, were constantly under regulatory
 14:11 scrutiny. So it really would be the conclusion of the
 14:12 regulatory groups with the safety of the product.

17:17 - 17:20

Grant, Hugh 02-04-2019 (00:00:13)

HG2_COMBINED_06.7

17:17 Q. Mr. Grant, at no time during the fifteen
 17:18 years you were the chief executive officer at Monsanto
 17:19 did Monsanto attempt to put a warning label warning
 17:20 consumers about the risk of cancer from Roundup?

17:24 - 18:1

Grant, Hugh 02-04-2019 (00:00:03)

HG2_COMBINED_06.8

17:24 A. I -- to the best of my knowledge, that has
 18:1 never occurred.

18:3 - 18:17

Grant, Hugh 02-04-2019 (00:00:56)

HG2_COMBINED_06.9

18:3 Q. And one of the reasons it's never occurred
 18:4 is Monsanto takes the position that Roundup simply does
 18:5 not cause cancer; right?

18:6 A. This goes to your earlier question, sir.
 18:7 It's our conclusion that Roundup does not cause cancer.
 18:8 But more importantly, in the regulatory jurisdictions
 18:9 around the world, in the U.S., in Canada, in Japan, in
 18:10 Europe, with the German rapporteurs, it has been their
 18:11 conclusion for the last 40 years, and that's the point
 18:12 I was trying to make earlier.
 18:13 It's -- this is a conclusion that's
 18:14 validated by scientific evaluation, so we're a
 18:15 science-based company, and the regulators are looking
 18:16 at the science at that time, and that is their
 18:17 conclusion also.

19:16 - 20:1

Grant, Hugh 02-04-2019 (00:00:32)

HG2_COMBINED_06.10

19:16 Mr. Grant, a flip side -- if in fact you
 19:17 believed after looking at the science that oh, it looks
 19:18 like Roundup does double the risk of someone getting
 19:19 non-Hodgkin's lymphoma, would you then if you believe
 19:20 that -- I mean, you're a family man, you have family in
 19:21 the St. Louis area. If you believed that Roundup was
 19:22 being sprayed in St. Louis and doubling the risk of the

20:4 - 20:13	<p>19:23 children in St. Louis and the adults in St. Louis of 19:24 getting non-Hodgkin's lymphoma, would you put a warning 20:1 for that risk on the label?</p> <p>Grant, Hugh 02-04-2019 (00:00:35)</p> <p>20:4 A. It's -- now we've left the world of 20:5 science. As a science-based company, if that was the 20:6 scientific conclusion, then of course we would do it. 20:7 But you've speculated, and that is not -- that is 20:8 actually the complete opposite. 20:9 So for me, as you say, a family man and 20:10 for me as somebody who's worked at -- or did work at 20:11 Monsanto for nearly 40 years, that's never been -- 20:12 that's never been a conclusion, and regulators have 20:13 vouched for the safety of the product.</p>	HG2_COMBINED_06.11
28:24 - 29:5	<p>Grant, Hugh 02-04-2019 (00:00:18)</p> <p>28:24 Q. And I want to write down if I can, because 29:1 I know Monsanto has sold Roundup since 1974, I believe? 29:2 A. I think that's right. Mid-1970s, yeah. 29:3 Q. Almost 40-some years -- 40 years; is that 29:4 right? 29:5 A. Yeah.</p>	HG2_COMBINED_06.12
29:7 - 29:16	<p>Grant, Hugh 02-04-2019 (00:00:35)</p> <p>29:7 Let me do this now. Let's write down the 29:8 names of all the epidemiological studies that Monsanto 29:9 did to determine whether or not Roundup caused 29:10 non-Hodgkin's lymphoma. 29:11 How many studies did Monsanto do to make 29:12 sure there was no association between Roundup and 29:13 non-Hodgkin's lymphoma? Is it one, five? How many? 29:14 A. I have no idea how many studies were done, 29:15 sir. Again, I'm not an epidemiologist, I'm not a 29:16 toxicologist.</p>	HG2_COMBINED_06.13
40:16 - 40:23	<p>Grant, Hugh 02-04-2019 (00:00:14)</p> <p>40:16 Q. Well, I'm referring to you, Mr. Grant. 40:17 You do interviews with media. You did when you were 40:18 with Monsanto; that's true, isn't it? 40:19 A. That was a piece of my responsibilities, 40:20 yes. 40:21 Q. And in those interviews, you would tell 40:22 people that Roundup, in spite of evidence to the</p>	HG2_COMBINED_06.14

41:5 - 41:8

40:23 contrary, does not cause cancer; right?

Grant, Hugh 02-04-2019 (00:00:18)

HG2_COMBINED_06.15

41:5 A. I had no -- the vast weight of scientific
41:6 evidence for 40 years from independent regulators
41:7 around the world absolutely condoned the statement that
41:8 Roundup did not cause cancer.

89:23 - 90:19

Grant, Hugh 02-04-2019 (00:01:05)

HG2_COMBINED_06.16

89:23 Q. And a science-based company -- by that do
89:24 you mean Monsanto looks at the data and is driven by
90:1 what the data shows? Is that right?

90:2 A. Well, I think it's even broader than that.
90:3 I think it encompasses that, but it's even broader than
90:4 that. So we were spending about a billion-and-a-half
90:5 dollars a year on research and development.
90:6 So being science-based, one end is being
90:7 driven by innovation and the development of new
90:8 products that make life better or more productive for
90:9 our grower customers. At one end -- and the other end
90:10 I would agree is driven by data.

90:11 Q. So just to be clear I -- make sure I heard
90:12 you straight. Monsanto was spending on the order of
90:13 one-and-a-half billion dollars a year in research and
90:14 development?

90:15 A. More or less, yeah.

90:16 Q. And just to be clear, notwithstanding that
90:17 hefty sum, Monsanto never decided to spend some of it
90:18 on conducting an epidemiological study on Roundup;
90:19 right?

90:22 - 92:17

Grant, Hugh 02-04-2019 (00:01:50)

HG2_COMBINED_06.17

90:22 A. I think we've covered this a few times
90:23 already, but the investment in R&D was over a long-time
90:24 horizon. This wasn't a question of what we spend on
91:1 epidemiological studies, it was much more a question,
91:2 again, of what was required by the regulatory
91:3 authorities around the world.

91:4 BY MR. WISNER:

91:5 Q. And because the regulators never required
91:6 that Monsanto conduct an epidemiological study,
91:7 Monsanto never did one; right?

91:8 A. Well, there was an epidemiological study

91:9 done as I've mentioned several times earlier on Roundup
91:10 on the full formulation, which took 20 -- almost 20
91:11 years to complete.

91:12 Q. I appreciate your answer, sir, but I
91:13 didn't ask you about other people doing studies. I was
91:14 asking about Monsanto, and I guess my question is
91:15 pretty straightforward.

91:16 Because the regulators never required that
91:17 Monsanto conduct an epidemiological study, Monsanto
91:18 never itself did one; right?

91:19 A. To the best of my knowledge we did not.

91:20 Q. You kept saying that there's a 40-year
91:21 record of safety.

91:22 Do you recall that?

91:23 A. I did. I do.

91:24 Q. I just want to be clear, though. For the
92:1 first 10 years that Roundup was on the market, its
92:2 carcinogenicity data was based on data from the IBT
92:3 Laboratories; correct?

92:4 A. I've already covered this. The work that
92:5 was done by IBT was all subsequently redone and vouched
92:6 for by the independent EPA.

92:7 Q. Fair enough.

92:8 And that was in the 1980s; right?

92:9 A. I don't know when it was. It was early,
92:10 but I don't know when it was.

92:11 Q. Specifically 1985. Does that sound right?

92:12 A. I don't know when it was.

92:13 Q. So it would be fair to say then for the
92:14 first 10 years or so of Roundup being on the market,
92:15 there was at that point no valid carcinogenicity
92:16 studies on the product until Monsanto actually redid
92:17 them?

92:20 - 92:22

Grant, Hugh 02-04-2019 (00:00:14)

HG2_COMBINED_06.18

92:20 A. I have no -- between 1974 and 1984, I have
92:21 no knowledge of what was and was not available. I'm
92:22 neither a toxicological expert nor an epidemiologist.

127:6 - 127:8

Grant, Hugh 02-04-2019 (00:00:10)

HG2_COMBINED_06.19

127:6 Q. In the 40 years you've been at Monsanto,
127:7 do you have any criticisms about the way Monsanto has

Page/Line	Source	ID
127:10 - 127:11	127:8 treated the carcinogenicity data of Roundup? Grant, Hugh 02-04-2019 (00:00:05)	HG2_COMBINED_06.20
128:1 - 128:13	127:10 A. I don't -- I have no reason to criticize 127:11 our treatment of data. Grant, Hugh 02-04-2019 (00:00:21)	HG2_COMBINED_06.21
129:2 - 129:16	128:1 Q. I'm going to go through a couple of the 128:2 scientists at Monsanto. 128:3 A. Okay. 128:4 Q. You know Dr. Donna Farmer? 128:5 A. I did. 128:6 Q. And you would agree she was somebody who 128:7 helped guide the science behind Roundup? 128:8 A. I think that was her -- I think she was a 128:9 toxicologist. 128:10 Q. And she played an important role in doing 128:11 that; right? 128:12 A. She was one of a team, but she's an 128:13 important role on them. Grant, Hugh 02-04-2019 (00:00:29)	HG2_COMBINED_06.22
129:19 - 129:21	129:2 Q. So you don't know about Heydens. What 129:3 about Dr. Daniel Goldstein? 129:4 A. Yes, I knew Dr. Goldstein. He was -- 129:5 Q. And he was a -- sorry. 129:6 A. Sorry, go ahead. 129:7 Q. He was a scientist at Monsanto? 129:8 A. He was a scientist. He was also a 129:9 pediatrician. He was a medical doctor. 129:10 Q. He was the Monsanto pediatrician; right? 129:11 A. Yeah, I guess. Yeah. 129:12 Q. That was the title on his blog; right? 129:13 A. Oh, I don't know what his title -- I have 129:14 no idea. 129:15 Q. Do you have any criticisms of Dr. 129:16 Goldstein's conduct or actions while at Monsanto? Grant, Hugh 02-04-2019 (00:00:09)	HG2_COMBINED_06.23
135:24 - 136:10	129:19 A. You're going to -- I -- in general, no, 129:20 but I can't comment on specifics without a specific 129:21 reference. Grant, Hugh 02-04-2019 (00:00:25) 135:24 Q. Having reviewed documents related to Dr.	HG2_COMBINED_06.24

136:1 James Parry and Monsanto's work with him, do you
136:2 believe that Monsanto did anything wrong with regards
136:3 to that situation?

136:4 A. Monsanto being the scientists who worked
136:5 with him?

136:6 Q. Yeah, Monsanto the scientists, Monsanto
136:7 the executives, anybody. Do you think anyone did
136:8 anything wrong with that?

136:9 A. Based on the review that I saw, I didn't
136:10 see anything wrong with him.

141:18 - 143:4

Grant, Hugh 02-04-2019 (00:01:44)

HG2_COMBINED_06.25

141:18 Q. You understand that one of the allegations
141:19 plaintiffs have made against Monsanto is that it has
141:20 engaged in ghostwriting? You understand that?

141:21 A. As a result of the preparation for the
141:22 deposition this afternoon, I have heard that term and
141:23 I've seen some documents.

141:24 Q. You've seen documents, for example, by Dr.
142:1 Heydens, for example?

142:2 A. I saw Dr. Heydens's documents.

142:3 Q. You saw another document maybe with Dr.
142:4 Koch? Did you see that?

142:5 A. I don't think so.

142:6 Q. Well, in any event, having reviewed these
142:7 documents, it's very simply -- do you think that
142:8 Monsanto has done anything wrong as it relates to
142:9 ghostwriting?

142:10 A. I haven't reviewed the documents. I am
142:11 satisfied that Monsanto did not ghostwrite. Although
142:12 that was covered in the memos, I feel confident in the
142:13 final outcome on what Dr. Heydens did.

142:14 Q. So you looked at what he did and you think
142:15 it was okay?

142:16 A. I looked -- are you going to -- are we
142:17 going to look at this in documents?

142:18 Q. I'd rather not if we can avoid it, but
142:19 unless -- if you want to go down this rabbit hole, we
142:20 can. I'm just trying to make sure that you've reviewed
142:21 the documents and you've concluded, as the former CEO
142:22 of Monsanto, that you don't think Dr. Heydens did

142:23 anything inappropriate.

142:24 A. I think it may be worth looking at the
143:1 documents, but I -- based on my limited exposure, I am
143:2 comfortable with the fact that Dr. Heydens did not
143:3 ghostwrite. And ghostwriting is something that we
143:4 would never tolerate.

216:8 - 219:9

Grant, Hugh 02-04-2019 (00:03:32)

HG2_COMBINED_06.25

216:8 Q. Mr. Grant, for the record, my name is
216:9 George Lombardi. I represent Monsanto. Where are you
216:10 from, Mr. Grant?

216:11 A. Originally I'm from Scotland, but I've --

216:12 Q. Did you grow up -- oh, go ahead.

216:13 A. But I've lived in the U.S. a long time.

216:14 Q. Did you grow up in Scotland?

216:15 A. Yeah, I did. I grew up in Scotland until

216:16 I was in my 20s.

216:17 Q. And where did you grow up? Did you grow

216:18 up in one of the big cities in Scotland?

216:19 A. No, I grew up in a small town kind of

216:20 where mining met agriculture, so it was a kind of

216:21 industrial town near Glasgow on the west coast.

216:22 Q. So did your grandparents live in that

216:23 town?

216:24 A. Yeah, they did. Yeah, my -- yeah, they

217:1 did. I come from -- my grandpar -- my grandfathers

217:2 were both coal miners, so I come from a long lines of

217:3 coal miners.

217:4 Q. And how about your parents? What did they

217:5 do for a living?

217:6 A. My dad was a foundry worker, so he worked

217:7 in the steel mills there. He was a foundryman. And

217:8 then ultimately he spent 30 -- 25, 30 years -- yeah, 25

217:9 years as -- he cut cloth, so he worked in a factory

217:10 that made suits and pants.

217:11 Q. How about your mother? Did she work

217:12 outside the home?

217:13 A. Yeah, she did -- yeah, she was -- she

217:14 worked in a deli. She was a delicatessen -- a person

217:15 that met the public in a deli.

217:16 Q. Did you go -- I'm sorry. I didn't mean to

217:17 interrupt you. Did you go to school in Scotland?

217:18 A. Yeah, I did my undergrad and postgrad year
217:19 in -- my undergrad in Glasgow and my postgrad in
217:20 Edinburgh.

217:21 Q. Did you have a focus of your studies when
217:22 you went to the University of Glasgow?

217:23 A. Yeah. As it is referred to in the U.S., I
217:24 did a double -- a split major or a double major. I did
218:1 agricultural and molecular biology.

218:2 Q. And how about -- did you call it
218:3 postgraduate, the next level --

218:4 A. Yes, I did the postgrad year in Edinburgh,
218:5 and that was in agriculture -- kind of applied
218:6 agriculture.

218:7 Q. And at some point did you get a further
218:8 degree -- educational degree?

218:9 A. Yeah, I did an MBA several years later. I
218:10 did an MBA at the International Management Center in
218:11 Buckingham, England.

218:12 Q. How did you get interested in agriculture?

218:13 A. I had always -- I guess it's all these
218:14 things that's serendipitous, but I was always focused
218:15 on two things, the ability to work outside and the
218:16 ability to travel and leave Scotland. So I'm part of
218:17 the diaspora that left. And I'd worked on farms as a
218:18 kid. I harvested lettuce and tomatoes in the fields
218:19 around my hometown, and I had a good friend whose dad
218:20 was a dairy farmer. I spent weekends on farms, so I
218:21 kind of knew that this was -- it was kind of my dream
218:22 to be in agriculture, and the more I did, the more
218:23 convinced I was.

218:24 Q. Now, after you finished your postgraduate
219:1 study at the University of Edinburgh, where did you
219:2 take your first job?

219:3 A. I joined -- I actually was hired from the
219:4 University of Edinburgh by Monsanto, so I -- they
219:5 waited, let me graduate, and I only worked for one
219:6 company under many, many iterations.

219:7 Q. And just so the jury has the time frame,
219:8 what year was that that you began working for Monsanto?

Page/Line	Source	ID
223:19 - 223:21	219:9 A. That was the summer of 1981. Grant, Hugh 02-04-2019 (00:00:06)	HG2_COMBINED_06.27
224:9 - 224:18	223:19 Q. Been a lot of talk about Roundup in this 223:20 deposition. Have you personally used Roundup over the 223:21 years, Mr. Grant? Grant, Hugh 02-04-2019 (00:00:36)	HG2_COMBINED_06.28
224:23 - 225:22	224:9 A. Yeah, I've personally used it both in my 224:10 professional life -- my first few years I was -- that's 224:11 what I did. I applied Roundup every day and -- or most 224:12 days, and after -- in fact, for my 37 years, I have 224:13 personally used Roundup to control weeds in my backyard 224:14 here and in Scotland and my dad's place and a little 224:15 cottage that we have. 224:16 BY MR. LOMBARDI: 224:17 Q. What do you use Roundup to control in 224:18 Scotland in particular? Grant, Hugh 02-04-2019 (00:01:22) 224:23 A. I -- in Scotland I've used it to control 224:24 nettles and thistles. So they're perennial weeds. 225:1 That means they come back every year. And when the 225:2 kids were little, the last thing you want is kids 225:3 running in a nettle patch. So in Scotland there's 225:4 nettles and thistles. Here in St. Louis, I live in the 225:5 city and it's more weeds coming through cracks in the 225:6 concrete and where the driveway meets the gravel, so 225:7 there's always pesky grasses that flare up. 225:8 BY MR. LOMBARDI: 225:9 Q. So Mr. Grant, during your tenure at 225:10 Monsanto, what role did science play in the company? 225:11 A. Science was the absolute heart of 225:12 everything that we did. We invested heavily and early 225:13 in science and we have -- we had -- I'm sorry -- the 225:14 past tense. We had the largest community of plant 225:15 scientists and PhDs focused in plant science on the 225:16 planet, so it was -- we were driven by innovation and 225:17 converting great science into really great products to 225:18 make life better for growers. 225:19 BY MR. LOMBARDI: 225:20 Q. Was getting the science right important to 225:21 Monsanto during your tenure there?	HG2_COMBINED_06.29

Page/Line	Source	ID
226:1 - 226:1	225:22 A. It absolutely was. Grant, Hugh 02-04-2019 (00:00:00)	HG2_COMBINED_06.30
226:3 - 226:19	226:1 Q. Why? Grant, Hugh 02-04-2019 (00:00:56) 226:3 A. Because it was everything that we stood 226:4 for, and sound science was the bedrock, it was the 226:5 platform that we operated on. 226:6 BY MR. LOMBARDI: 226:7 Q. During your time at CEO were scientists 226:8 employed by the company? 226:9 A. Yeah, there was many, many scientists 226:10 employed. Then it was -- right here in St. Louis, it 226:11 was -- and they're still there today. Under the Bayer 226:12 deal, the scientists are still there. It was kind of 226:13 like the United Nations. We had every nationality 226:14 represented and -- well, not every nationality. It was 226:15 a very diverse group of scientists both in their 226:16 origins and also in the disciplines. So we had 226:17 roboticists and bioinformatics, plant breeders, 226:18 geneticists, molecular bios, all working in combined 226:19 teams.	HG2_COMBINED_06.31
232:21 - 233:13	232:21 Q. Now, have you learned about the safety 232:22 profile of glyphosate and Roundup in the course of your 232:23 work at Monsanto? 232:24 A. Yes, I have. Yeah. 233:1 Q. And how did you learn about it? From whom 233:2 did you learn about the safety profile? 233:3 A. Well, over 30 -- over almost 40 years in 233:4 various parts of the world and in various 233:5 responsibilities. As the regulatory authorities were 233:6 constantly going through these reviews and 233:7 re-registrations, I was exposed to that, so it wasn't 233:8 an epiphany or -- this was -- it was omnipresent. 233:9 There was always a period where the product was being 233:10 reviewed. At least that's how it felt. 233:11 Q. And generally, what did you learn about 233:12 the safety profile of glyphosate and Roundup over the 233:13 course of your tenure at Monsanto?	HG2_COMBINED_06.32
233:15 - 233:17	Grant, Hugh 02-04-2019 (00:00:07)	HG2_COMBINED_06.33

243:20 - 244:21

233:15 A. Both from the work scientists within the
 233:16 company and from the regulatory agencies around the
 233:17 world that it was unrivaled in its safety position.

Grant, Hugh 02-04-2019 (00:01:24)

HG2_COMBINED_06.34

243:20 Q. Mr. Grant, during your time at Monsanto,
 243:21 did you have a view about whether the company should
 243:22 communicate with the public about the safety of
 243:23 glyphosate?

243:24 A. Yeah, that is -- I -- it's not just
 244:1 should. I think there's a responsibility for companies
 244:2 like Monsanto. There's a responsibility to communicate
 244:3 the science and to communicate what the products do
 244:4 when used as advised. So I don't think that's a
 244:5 should. I think that frankly is a -- that's a
 244:6 responsibility.

244:7 Q. Why do you view it as a responsibility?

244:8 A. Because I think for -- and we talked about
 244:9 this a little bit this afternoon. For parents -- for
 244:10 young parents, there is a vacuum of scientific
 244:11 knowledge, and at the very -- and this isn't just
 244:12 Monsanto and it isn't just agriculture, but at the very
 244:13 time that science is advancing, the understanding of
 244:14 science has declined, so I would couch it as if not the
 244:15 companies communicating, then who? So I think it's a
 244:16 responsibility and that's an increasing responsibility
 244:17 over time.

244:18 Q. Did you view there as being anything
 244:19 inappropriate about Monsanto communicating its views
 244:20 about the science to the public?

244:21 A. I didn't, no.

████████████████████
 ████████████████████
 Total Time = 00:21:22