

Message

**From:** WILSON, ALAN G E [PHR/1000] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=101608]  
**Sent:** 9/2/1999 7:34:13 PM  
**To:** FARMER, DONNA R [FND/1000] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=180070]  
**Subject:** RE: Comments on Parry write-up

Donna,

If Larry has the time that would be great, but be careful we don't get into another Cantox situation, that could take some time wordsmithing and reaching consensus. I certainly think it would be valuable to resolve points of clarity. Maybe you should invite Perry to St. Louis to get him more familiarized with the complete database. I know they've cut back on your outreach, but if Jerry is serious about this then it will need some priority, since this has drifted on for some time. Good luck, let me know if I can be of help.

Alan

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

**From:** FARMER, DONNA R [FND/1000]  
**Sent:** Thursday, September 02, 1999 2:24 PM  
**To:** WILSON, ALAN G E [PHR/1000]  
**Subject:** RE: Comments on Parry write-up

Alan,

One option...I agree we need someone else to interface with Perry...right now the only person I think that can dig us out of this "genotox hole" is the Good Dr. Kier....

other option...I am concerned about leaving Perry out there with this as the final project/his final impressions.....if you remember his first report...he was looking for work for a graduate student (I wonder if this evaluation was his or someone else's?)

Maybe you, Bill, Larry, Steve and I can get together to figure out where and how we go from here...Steve's opinion of the report was pretty clear....he also suggested as an option to drop Perry.

Donna

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

**From:** WILSON, ALAN G E [PHR/1000]  
**Sent:** Thursday, September 02, 1999 1:30 PM  
**To:** FARMER, DONNA R [FND/1000]  
**Subject:** RE: Comments on Parry write-up

Donna,

Two options work closely with Parry (i.e. someone other than [REDACTED] or get someone else.

alan

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

**From:** FARMER, DONNA R [FND/1000]  
**Sent:** Thursday, September 02, 1999 12:56 PM  
**To:** WILSON, ALAN G E [PHR/1000]  
**Subject:** FW: Comments on Parry write-up

Plaintiff Exhibit

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Alan,

FYI,

Donna

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

**From:** WRATTEN, STEPHEN J [FND/1000]  
**Sent:** Tuesday, August 31, 1999 5:17 PM  
**To:** [REDACTED] FARMER, DONNA R [FND/1000]  
**Cc:** KIER, LARRY D [NCP/1000]; HEYDENS, WILLIAM F [FND/1000]; [REDACTED]  
**Subject:** Comments on Parry write-up

[REDACTED] 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 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.
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?
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.
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.
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.
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.
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?
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.

Steve

*Steve Whitten*

 (voice)  
(fax)