

Mr. Swimmer asserts that DEA failed to consider the research of a Dr. James Woodford, who has reported a link between paraquat and Parkinson's disease. Mr. Swimmer also asserts that DEA gave inadequate consideration to toxic substances produced when glyphosate is burned and to glyphosate's asserted cholinesterase poisoning properties. Mr. Swimmer's March 27, 1986 letter was received by DEA over a month after the public comment period had closed. It was therefore not reproduced in the Final DEA-EIS-2. Each area of concern, however, was adequately addressed in the final EIS.

In response to concerns expressed by Dr. Woodford himself, as well as other commentators, regarding the alleged link between DEA and Parkinson's disease, DEA replied:

DEA has reviewed the documents and references submitted by the commentators in the preparation of the final EIS... The articles and data present several suppositions as to the cause of Parkinson's disease, but they present no new evidence linking paraquat to this disease. In the extensive toxicological testing of paraquat, including nonrodent species such as dogs, no Parkinson-like symptoms have been observed. In addition, several epidemiological studies conducted on paraquat have not reported any evidence of this disease. Furthermore, as stated by the Environmental Protection Agency (EPA): 'Data on paraquat metabolism, photo-chemical and environmental degradation do not demonstrate degradation of paraquat to MDTP gamma picoline.'

DEA-EIS-2, pp. G-77 to 78.

DEA carefully considered the possibility that the combustion of cannabis contaminated with glyphosate might result in the production of toxic substances. DEA, in fact, commissioned new and independent scientific research on the pyrolysis products of glyphosate in cooperation with the National Institute on Drug Abuse. The toxicity of acetonitrile and the liberation of cyanide from acetonitrile are discussed in detail in Appendix B of DEA-EIS-2.

Finally, Mr. Swimmer asserted in his March 27, 1986 letter that "the cholinesterase poisoning properties of glyphosate have been omitted from the EIS." Mr. Swimmer cited no studies to support his assertion that glyphosate is a cholinesterase inhibitor; Dr. Woodford, to whom he attributed this opinion, did not raise this issue in his own written comments to DEA. Despite the existence of an extensive body of scientific research on glyphosate, including EPA-verified toxicity studies, DEA is aware of no studies which conclude that glyphosate is a cholinesterase inhibitor.