
From: Watson Greg USGR
Sent: Friday, September 23, 2005 6:09 PM
To: McAllister, Ray
Subject: SAP Comments - For your use

Ray,

To put this in context, let's repeat what was sent in previously:

DEBORAH CORY-SLECHTA

Dr. Cory-Slechta has been active in examining the effect of chemicals in a mouse model. This short-term model uses intraperitoneal administration of chemicals over a relatively short timeline and at relatively high doses. For obvious reasons intraperitoneal exposure of agents creates some concerns about extrapolation of the results of the research. Although the animal model is simply a research tool with clear limitations in reflecting a chronic progressive disease in humans (i.e., extrapolation issues regarding short term intraperitoneal exposure), Dr. Cory-Slechta's presentations have reported conclusions beyond what the data reasonably support. Her presentations in meetings, appearances in the press, and publications often include overly-dogmatic statements and over-interpretation of data with subsequent conclusions that are, in reality, speculation. Overall, we feel that Dr. Cory-Slechta is not an appropriate candidate for the scientific advisory panel, based on these reservations.

Additional Background:

From this intraperitoneal administration - completely irrelevant to realistic exposures - the following gives some examples of the statements that cannot be supported by her research. Exposure to the pesticides mentioned in her research are well studied; for example, there was an extensive market basket study done with members of the EBDC fungicide class that EPA has utilized in regulation. It is extremely difficult to link 'environmental exposures' that she mentions below to the intraperitoneal administration utilized in her experiments. Finally, her statements are very much in line with the now refuted work that led to the inclusion of endocrine requirements in FQPA.

' The study is one of the first to examine the effects of such chemicals in tandem. Cory-Slechta notes that current regulations and determinations of safety levels are usually based on the effects of single chemicals. "In the real world, we're exposed to mixtures of chemicals every day. There are thousands upon thousands of combinations; I think what we have found is the tip of the iceberg," she says. "There are a dozen different fungicides related to maneb alone. I don't think we just happened to pick the right chemicals to see such an effect."

Further direct links to the environmental activist agenda can be found at the PANNA web site:

Another study at the University of Rochester showed that the combined exposure of the herbicide paraquat and the fungicide maneb -- applied to millions of acres of farmland each year -- are known to affect the neuro-transmitter network in mice and produce a pattern of brain disorders that are very similar to those found in humans with Parkinson's.

Lead researcher Deborah Cory-Slechta said that the findings could be a warning signal that current environmental investigations on the health effects of pesticides do not cover enough ground. She added that the findings would hopefully prompt the U.S. Environmental Protection Agency to investigate the potential hazards of exposure to combined pesticides.

Finally, statements made by Dr. Cory-Slechta at meetings follow this same path:

'Our data are in support of anecdotal evidence from e-mail communications I have had with farmers and their families who have used pesticides and who have subsequently developed Parkinson's disease'

Best Regards,

Greg Watson

State Regulatory Affairs & Federal Label Support: Team Lead
Syngenta Regulatory Affairs
ph 336 632 2993