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Data, "the literature review was limited to a relatively small portion of the total epidemiology database. Of the more than 140 studies that are pertinent to the phenoxy herbicides, the OCFP reviewers found only a handful suitable for their purposes. The criteria used to determine which studies would be reviewed are not clear. It appears that studies showing an association between pesticides and cancer or other health problems were given priority over studies showing no association.

The OCFP review states, "Morrison et al. conducted a large study of 155,000 farmers in Canada and found a statistically significant increase in non-Hodgkin's lymphoma (NHL), the risk increasing with acres sprayed.'

This is an extraordinary misrepresentation of the study according to Don Page. "Recent biomonitoring studies have demonstrated that pesticide application and number of acres applied is not a valid predictor of exposure. The study did not show a statistically significant increase in NHL, since the Standard Mortality Rate for NHL was 0.79, indicating significantly fewer deaths from NHL compared to the Canadian population as a whole. The study shows the Standard Mortality Rate from all causes of death was 0.72, indicating that these farmers are living longer than the average Canadian. The Standard Mortality Rate for all cancers was 0.76, indicating that these farmers have fewer deaths from cancer than the Canadian population as a whole.

"According to the OCFP review, this study is an indictment of pesticides."

Another anomaly, according to Don Page, "The U.S. National Cancer Institute has now spent 20 years and many  $millions \ of \ dollars \ testing \ the \ 2,4-D/non-Hodgkin's \ lymphoma \ hypothesis. \ They \ recently \ pooled \ the \ data \ from \ their$ three 2,4-D case-control studies, making one large study, and concluded in their analysis (De Roos, 2003) that there is no association between NHL and 'ever having used 2,4-D.' The authors of the section on non-Hodgkin's lymphoma in the OCFP review chose to ignore this.

"Apparently, De Roos, 2003 is another study which fails to meet the OCFP reviewers' criteria."

Donald Page goes on to state: "The OCFP review attempts to make a case that populations exposed to pesticides can expect a higher incidence of cancer and other health problems compared to the general population. Yet, it simply ignores a significant number of studies that do not support this hypothesis. The two Fleming studies in Florida (a mortality and a cancer incidence) are examples. Those studies found the overall incidence of cancer among the pesticide applicators to be significantly lower than the general Florida population adjusted for age, and the applicators to be in significantly better health. The authors of the OCFP review chose not to include these findings, or similar findings in other studies. These studies have shown that populations of applicators, farmers and chemical workers who manufacture or formulate 2,4-D products (and thus have a potentially higher exposure risk) have an overall mortality from cancer below that of the general population.'

Is it not interesting that "reviews by the World Health Organization (WHO) of 2,4-D (1996), the U.S. EPA Carcinogenicity Peer Review Committee's fourth review of 2,4-D (1997), the European Commission (2001) and the New Zealand Environmental Risk Management Authority (2003) came to conclusions very different from the conclusions reached by OCFP, which is perhaps why they were not included in the Ontario review!

"Those four agencies--which are mandated to protect human health--are in agreement that 2,4-D is not an animal carcinogen, mutagen or teratogen, and that the epidemiology database did not present a convincing case that there is evidence of a causal relationship between exposure to chlorophenoxy herbicides and the development of non-Hodgkin's lymphoma (NHL) and other cancers in humans.

The OCFP review also "failed to include the comprehensive literature reviews by researchers attempting to quantify the contribution of pesticides to the overall incidence of cancer. Such reviews include Doll & Peto (1981), Doll (1998), Ritter (1997) and Gold (2002). All four of these reviews conclude that the major causes of preventable cancer are smoking, alcohol consumption, and life style (mainly diet) and that the contribution from pesticides is negligible. These conclusions are very considerably different from what is being suggested by OCFP, which is probably the reason they

Finally Donald Page points out that "The OCFP authors did not include comprehensive expert panel reviews of 2,4-D that do not support the conclusions reached in the OCFP review. Examples are Garabrant (2002), USDA/NAPIAP (1996), Munro (1992), the Canadian Centre for Toxicology, University of Guelph (1991), Ibrahim (1991) and the Canadian Centres for Toxicology (1987).

After talking at length with Dr. Keith Solomon at the University of Guelph (he is chair of the Board of Directors of the Canadian Network of Toxicology Centres) about this, I looked up a little more information about Dr. (Sir) Richard Doll, professor emeritus of cancer research epidemiology at Oxford University. Both Don Page and Keith Solomon mentioned him. It is only about a year ago that the elderly good Doctor was at a meeting at the University of Guelph. The local news media reported: "When a local municipal politician asked Sir Richard if there was a connection between the use of pesticides and cancer, and if a ban was warranted on the use of lawn and garden pesticides, he responded, 'No. There's no scientific basis for it."

When are the doctors in the OCFP going to be honest with the public?

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