Monsanto's Paper Trail to The Verdict

Suppressing Monsanto Consultant's Carcinogenicity Findings

Houston—We have a problem

1998 Internal Monsanto Meeting

There is a concern that the papers by Lioi et al, may present an even bigger problem because the studies are with glyphosate and are on a more standard endpoints.

Subject: Actions from 12/17 Meeting on Mutagenicity

Author: DONNA R FARMER at MONSL125

Date: 12/27/98 1:31 PM

- It is a real concern that these papers may create an even bigger problem for us

Therefore we do some things quickly!

As EU has an immediate need and is a critical area now it was agreed that would contact Dr. Parry next week to discuss with him his participation in the support of glyphosate, glyphosate-based ***formulation*** gentox issues.

Dr. Parry's Conclusion

Author: DONNA R FARMER at MONSL125

Date: 4/17/99 7:25 AM

Dr. Parry concluded on his evaluation of the four articles that glyphosate is capable of producing genotoxicity both in vivo and in vitro by a mechanism based upon the production of oxidative damage.

Evaluation of the potential genotoxicity of Glyphosate,

Glyphosate mixtures and component surfactants

James M. Parry

Evaluation. These studies provide some evidence that Roundup mixture produces DNA lesions *in vivo*, probably due to the production of oxidative damage.

Monsanto's Reaction

Message

From: HEYDENS, WILLIAM F [FND/1000] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=230737]

Sent: 9/16/1999 6:18:36 PM

However, let's step back and look at what we are really trying to achieve here. We want to find/develop someone who is comfortable with the genetox profile of glyphosate/Roundup and who can be influential with regulators and Scientific Outreach operations when genetox. issues arise. My read is that Parry is not currently such a person, and it would take quite some time and \$\$\$/studies to get him there. We simply aren't going to do the studies Parry suggests. Mark, do you think Parry can become a strong advocate without doing this work Parry? If not, we should **seriously** start looking for one or more other individuals to work with. Even if we think we can eventually bring Parry around closer to where we need him, we should be currently looking for a second/back-up genetox. supporter. We have not made much progress and are currently very vulnerable in this area. We have time to fix that, but only if we make this a high priority now.

And who did they find...?

Regulatory Toxicology and Pharmacology 31, 117–165 (2000) doi:10.1006/rtph.1999.1371, available online at http://www.idealibrary.com on $\blacksquare D \ \blacksquare \ \blacksquare$

Safety Evaluation and Risk Assessment of the Herbicide Roundup and Its Active Ingredient, Glyphosate, for Humans

Gary M. Williams,* Robert Kroes,† and Ian C. Munro‡,2

Ghostwriting...the cheaper alternative?

From: HEYDENS, WILLIAM F [AG/1000]

Sent: Thursday, February 19, 2015 7:53 AM

For the overall plausibility paper that we discussed with John (where he gave the butadiene example), I'm still having a little trouble wrapping my mind around that. If we went full-bore, involving experts from all the major areas (Epi, Tox, Genetox, MOA, Exposure - not sure who we'd get), we could be pushing \$250K or maybe even more. A less expensive/more palatable approach might be to involve experts only for the areas of contention, epidemiology and possibly MOA (depending on what comes out of the IARC meeting), and we ghost-write the Exposure Tox & Genetox sections. An option would be to add Greim and Kier or Kirkland to have their names on the publication, but we would be keeping the cost down by us doing the writing and they would just edit & sign their names so to speak. Recall that is how we handled Williams Kroes & Munro, 2000.

Monsanto's Early Internal Knowledge Regarding Roundup Formulation Carcinogenicity

Monsanto Knew it had a Formulation Problem

----Original Message-----

From: FARMER, DONNA R [FND/1000]

Sent: Monday, August 02, 1999 4:24 PM

I will not support doing any studies on glyphosate, formulations or other surfactant ingredients at this time with the limited information we have on the situation.

Monsanto's Etheramine Working Group Meeting Notes December 10, 1999:

European Surfactant Review - Update and Decision Background

The genotoxicity of glyphosate, glyphosate-based formulations and the inert ingredients has been an ongoing issue in Europe for several years based on a number of reports in the open literature suggesting a mutagenic potential of som formulations of glyphosate.

Monsanto EU Exec Echoing Hear No Formulation Evil

From: MARTENS, MARK A [AG/5045]

Sent: Monday, February 12, 2001 8:34 AM

if somebody came to me and said they wanted to test Roundup I know how I would react - with serious concern. We have to really think about doing formulations even if they are not on the market....

Even Years Later, in 2009 Monsanto's Chief Toxicologist Can't Say Roundup Does Not Cause Cancer

Message

From: FARMER, DONNA R [AG/1000] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=180070]

Sent: 9/21/2009 5:12:07 PM

To: COMBEST, JOHN C [AG/1000]

Subject: RE: Roundup article in Fremantle Herald

Or this - you cannot say that Roundup does not cause cancer..we have not done carcinogenicity studies with "Roundup".

Original Message
From: HEYDENS, WILLIAM F [AG/1000]
Sent: 30 January 2010 23:51
To:
Subject: RE: KP conversation on POEA
Sensitivity: Confidential
I cede to sknowledge of the situation in Germany/EU.
A couple comments. First, There is still a strong sentiment in STL that we need to continue
to defend tallowamines even though we prepare to switch over because of their impending
demise. Reasons to do so: "domino effect" on etheramines; defend other world areas to the
best of our ability. Second. I was in Brazil all last week - they are very worried about this
coming across the Atlantic to their part of the American hemisphere.
Bill
\times \pm \pm \pm \pm

----Original Message--

From:

Sent: Monday, January 25, 2010 12:36 PM

To: HEYDENS, WILLIAM F [AG/1000]

Subject: Re: KP conversation on POEA

Sensitivity: Confidential

Anyway, there are non-hazardous formulations so why sell a

hazardous one?

From 2010 Internal Monsanto Power Point

Strategy in Germany

- Defend POEAS (and science based regulation): industry consortium
 - Build bridge to new registrations
 - Push back on data requests
 - Perform selected studies & risk assessments
 - Understand the politics low success
 - Communicate disproportionate restrictions, data requests

POEA manufacturers

Akzo, Clariant

POEA product registrants

Agrichem, Albaugh, Barclay, Cheminova, DAS, Monsanto, Nufarm

Monsanto Massaging French POEA Position

From: CARPINTERO, DAVID [AG/5040]

Sent: Tuesday, April 05, 2016 3:51 PM

We are expecting the letter of intention from French regulator ANSES very soon, and it might point to "imminent health risk" regarding the use of tallowamine.

We do not agree with the withdrawal but we will abide. We simple would need the argumentation for the ban/withdrawal to not be based on "human health" but other on considerations like precautionary principle.

The consequences of this ban if referring to human health risks have the potential to go beyond France and would

potentially have global and trade impact. It is therefore of essence that any intention to ban does not refer to imminent

human health risk.

Monsanto's Whack-A-Mole Program

From: "GOLDSTEIN, DANIEL A [AG/1000]" < daniel.a.goldstein@monsanto.com

Date: March 3, 2010 11:07:55 AM CST
To: "Chassy, Bruce"
bchassy@uiuc.edu>

cc: "SACHS, ERIC S [AG/1000]" < eric.s.sachs@monsanto.com >, "FARMER, DONNA R

[AG/1000]" < donna.r.farmer@monsanto.com > Subject: RE: another mole needing a whacking...

Two comments:

1) Funny you should say that... Donna Farmer (glyphosate tox) and I have been playing **Whack-a-Mole** for years and calling it just that. We were joking about it yesterday.

From: Chassy, Bruce [mailto:bchassy@uiuc.edu]
Sent: Wednesday, March 03, 2010 10:39 AM
To: GOLDSTEIN, DANIEL A [AG/1000]

Cc: SACHS, ERIC S [AG/1000]

Subject: Fwd: another mole needing a whacking...

Dan

This is like playing Whack-a-mole at the carnival.

Jeff's back again.

We'll be working on this too. Isn't freedom of speech wonderful?

Bruce

http://www.foodconsumer.org/newsite/Safety/gmo/gm_foods_children_3002100732.html

FOOD CONSUMER

GM Foods Are More Dangerous For Children Than Adults

1st March 2010.

Excerpted from Jeffrey M. Smith's Genetic Roulette: The Documented Health Risks of Genetically Engineered Foods

Retraction by corruption: the 2012 Séralini paper Eva Novotny*

Clare Hall, Herschel Road, Cambridge, CB3 9AL, United Kingdom

The retraction of the Séralini et al. (2012) paper [6] is especially irrational because the work, which found harm from a GM maize in a laboratory feeding trial, was essentially a superior

repetition of an older study [7] by Monsanto, the developer of the maize, that had found no harm; that paper had been published in the same journal and remains in print.

2.1 Design of the experiment

In 2004, Monsanto scientists led by Hammond [7] published a 13-week study on the feeding of Monsanto's GM maize NK 603 to Sprague Dawley rats. The design of the experiment was adapted from guideline 408 of the Organization for Economic Cooperation and Development (OECD).

Whacking Seralini

Monsanto Employee, David Saltmiras, Accomplishments in his 2012 Performance Review

Throughout the late 2012 Seralini rat cancer publication and media campaign, I leveraged my relationship the Editor if Chief of the publishing journal, Food and Chemical Toxicology and was the single point of contact between Monsanto and the Journal.

4 (iii) Successfully facilitated numerous third party expert letters to the editor which were subsequently published, reflecting the numerous significant deficiencies, poor study design, biased reporting and selective statistics employed by Seralini. In addition, coauthored the Monsanto letter to the editor with Dan Goldstein and Bruce Hammond.

From: SACHS, ERIC S [AG/1000]

Sent: Wednesday, September 26, 2012 12:03 PM

To: SALTMIRAS, DAVID A [AG/1000]; HEYDENS, WILLIAM F [AG/1000]; HAMMOND, BRUCE G [AG/1000]; GOLDSTEIN, DANIEL A [AG/1000]; VICINI, JOHN L [AG/1000]; NEMETH, MARGARET A [AG/1000]; LEMKE, SHAWNA LIN [AG/1000]

Subject: RE: Letters to the Editor?

I remain adamant that Monsanto must not be put in the position of providing the critical analysis that leads the editors to retract the paper.

I talked to Bruce Chassy and he will send his letter to Wally Hayes directly and notify other scientists that have sent letters to do the same. He understands the urgency.

From: Chassy, Bruce M [@illinois.edu]

Sent: Wednesday, September 26, 2012 2:38 PM

To: A. Wallace Hayes

Subject: Re: Séralini et al

I believe that the action you propose dignifies misconduct far beyond its due. My intent was to urge you to roll back the clock, retract the paper, and restart the review process.

RE: Consulting Agreement dated August 21, 2012, between Prof. A. Wallace Hayes and Monsanto Company (the "Agreement"); Project Title: Latin America South Toxicology Expert Panel initial meeting preparation and participation.

Dear Prof. Hayes:

This letter is issued pursuant to the Agreement and authorizes you to provide the following consulting services beginning September 7th, 2012 for the agreed upon fee of \$400.00 per hour, not to exceed \$3,200 per day and a total of \$16,000:

[Assist in establishment of an expert network of toxicologists, epidemiologists, and other scientists in South America and participate on the initial meeting held within the region. Preparation and delivery of a seminar addressing relevant regional issues pertaining to glyphosate toxicology is a key deliverable for the inaugural meeting in 2013.]

From: GOLDSTEIN, DANIEL A [AG/1000]

Sent: Friday, September 28, 2012 02:21 PM Central Standard Time

To: SACHS, ERIC S [AG/1000]; GAO, YONG [AG/1000]

Subject: RE: Slides- Seralini Publication

Considered doing this already- but I was uncomfortable even letting shareholders know we are aware of this LTE.... It implies we had something to do with it- otherwise how do we have knowledge of it?

Monsanto Suppressed Roundup Penetration Rates

Results from the "TNO" Study

TNO report

V 4478

In vitro percutaneous absorption study with [14C]glyphosphate using viable rat skin membranes

Date 14 June 2002

Authors Drs. J.A. van Burgsteden

At request of Monsanto Europe S.A.

Tervuren Avenue 270-272

B-1150 Brussels

Belgium

Fourty-eight hours after application of concentrated MON 35012, $10.3 \pm 4.2 \%$ of the dose glyphosphate had penetrated through rat skin membranes.

Burying Head in the Sand

From: HEYDENS, WILLIAM F [AG/1000] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=230737]

Sent: 4/2/2002 12:45:18 PM

To: HEALY, CHARLES E [AG/1000] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=297008]

Subject: RE: TNO dermal penetration studies: new issues and topics for the conf call of Tuesday, 2 April (8 A.M STL time)

Chuck,

. My primary concern is with the

glyphosate in terms of the potential for this work to blow Roundup risk evaluations (getting a much higher dermal penetration than we've ever seen before.

Bill

----Original Message----

From: GARNETT, RICHARD P [AG/5040]

Sent: Friday, April 05, 2002 12:46 AM

To: FARMER, DONNA R [AG/1000]; BROECKAERT, FABRICE [AG/5040]; GUSTIN, CHRISTOPHE [AG/1000]; LI, ABBY A [AG/1000];

HEALY, CHARLES E [AG/1000]; MARTENS, MARK A [AG/5040]; KRONENBERG, JOEL M [AG/1000]; WRATTEN, STEPHEN J

[AG/1000]; JACOBS, ERIK [AG/5040]; MCKENNA, RUTH M [AG/1000]

Cc: HEYDENS, WILLIAM F [AG/1000] **Subject:** RE: TNO dermal penetration studies

Donna

We dropped the programme for glyphosate because a further study was not likely to help us meet the project objective:

- > we initiated the studies from a regulatory angle to help meet the requirements for operator exposure, given that the Annex I end point for dermal absorption for glyphosate was set at 3%, which we believed was a high value based on a weight of evidence approach.
- > the results of the rat skin studies show levels of absorption for glyphosate of a similar order to the Annex I end point; also confirm our expectation that surfactant concentration affects the dermal absorption
- > therefore, from the regulatory angle, there is no point in pursuing the studies further

----Original Message----

From: HEALY, CHARLES E [AG/1000]

Sent: 04 June 2004 20:23

To: GARNETT, RICHARD P [AG/]

Cc: WRATTEN, STEPHEN J [AG/1000]; FARMER, DONNA R [AG/1000]

Subject: RE: MON 59117 GI tract study

Richard:

This work was completed last year. The full report can be viewed in Documentum. Below is a copy of the summary page of the report. Basically what we demonstrated was that the material is absorbed through the GI tract as shown. Nothing I am aware of that needs to be reported. We were hoping that we could demonstrate that the material was not absorbed as a means to obviate the need to perform toxicity testing with similar inert ingredients. Obviously that hope was not realized. Please let me know if you need more information.

From: CARROLL, MICHAEL J [AG/8050] [/O=MONSANTO/OU=EA-8050-01/CN=RECIPIENTS/CN=14038]

Sent: 5/22/2003 8:10:08 AM

6. The silthiofam formulation Latitude(MON 65507) contains certain co-formulants like humectants that will make it highly likely we will get large amounts penetrating the skin.

Defending Monsanto by Discrediting IARC

Planning for Undermining IARC Publication

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From: FARMER, DONNA R [AG/1000]
Sent: Thursday, September 18, 2014 12:19 PM
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Just wanted to let you that what we have long been concerned about has happened. Glyphosate is on for an IARC review in March of 2015.

And while we have vulnerability in the area of epidemiology, we also have potential vulnerabilities in the other areas that IARC will consider, namely, exposure, genetox, and mode of action (David has the animal onco studies under

ATTACHMENT A: PREPAREDNESS AND ENGAGEMENT PLAN FOR IARC CARCINOGEN RATING OF GLYPHOSATE

Last Updated: February 17, 2015

OBJECTIVES FOR PREPAREDNESS & ENGAGEMENT

Protect the reputation and FTO of Roundup by communicating the safety of glyphosate

POST-IARC

Orchestrate Outcry with IARC Decision ~ March 10, 2015

July 2015 Anti-IARC Battle Plan

Demonstrate Safety of Glyphosate

Goals:

- 1. WHO Retraction/Clarification/Minimization: Lowry/Dykes
 - a. Make sure determination doesn't get more widely adopted within WHO
 - b. Prevent spread to WTO/SPS
 - c. Prevent future bad IARC decisions on pesticides/GMOs
 - d. Invalidate relevance of IARC

From: HEYDENS, WILLIAM F [AG/1000]

Sent: Thursday, August 06, 2015 9:55 AM

That said, the surfactant in the formulation will come up in the tumor promotion skin study because we think it played a role there.

From: Ashley Roberts Intertek @intertek.com]

Sent: Thursday, August 06, 2015 09:47 AM Central Standard Time

He has asked if we need to give any consideration to exposures of formulants in the commercial product, at least in applicators? I was under the impression these were inert but reading a response this morning in the Ecologist makes it sound like it is the combination that is toxic!!!

Message

From: GOULD, STEVEN D [AG/1000] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=116457]

Sent: 9/10/2015 10:41:00 PM

To: HARDY, JOHN O [AG/1000] [/O=MONSANTO/OU=NA-1000-01/cn=Recipients/cn=53364]

Subject: Fwd: California EPA Moves to Label Monsanto's Roundup 'Carcinogenic' | East Bay Express

I liked this analogy from Greg

Steve Gould

Begin forwarded message:

From: Greg Fernald < GFernald@wilburellis.com >

Date: September 10, 2015 at 3:19:21 PM PDT

To: "GOULD, STEVEN D [AG/1000]" < steven.d.gould@monsanto.com>

Subject: RE: California EPA Moves to Label Monsanto's Roundup 'Carcinogenic' | East Bay Express

We are being overrun by liberals and morons...sort of like a zombie movie, so we just have to start taking them out one at a time, starting with the elections next year.

Greg Fernald Professional Markets

Colluding With Regulators

From: JENKINS, DANIEL J [AG/1920]

Sent: Tuesday, April 28, 2015 9:33 AM

Also, Jess called to ask for a contact name at ATSDR. I passed on Jesslyn's email. He told me no coordination is going on and he wanted to establish some saying "If I can kill this I should get a medal". However, don't get your hopes up, I doubt EPA and Jess can kill this; but it's good to know they are going to actually make the effort now to coordinate due to our pressing and their shared concern that ATSDR is consistent in its conclusions w EPA.

From: JENKINS, DANIEL J [AG/1920] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=813004]

Sent: 9/3/2015 1:23:14 PM

No questions but Dr Jess Rowland at EPA is quite proud of their recent endocrine conclusions and is also on point regarding their IARC response. Jess will be retiring from EPA in \sim 5-6 mos and could be useful as we move forward with ongoing glyphosate defense.

From: GARNETT, RICHARD P [AG/5040]

Sent: Thursday, February 19, 2009 1:13 AM

Cannot win the battle on science alone (40% science : 60% politics)

"Spoke to EPA: is going to conclude that IARC is wrong. So is EFSA....pushed them to make sure atsdr is aligned, said they would...they're looking into getting a contact for me at cdc re bio monitoring"

"I think we need to talk about a political level EPA strategy and then try to build a consensus plan w Michael on several fronts: glyphosate...we're not in good shape and we need to make a plan[.]"

"might want to tell them we're going to need their support for glyphosate...We're in for a tough ride[.]" at *2. "Jess is doing a nice job at EPA[.]" "Is there anyone we can get to in EPA?"

Service, Direction, Date, Content, Subject, Sender, Participants, Attachments, Date Read, Date
Delivered,Failed iMessage,Outgoing,2013-02-11 19:09:39 (UTC),I think Erin should be part of the meeting tomorrow w Phil. What do you think?,,Self,SUSAN MARTINO-CATT ((UTC), Self,0,,2013-02-11 19:09:42 (UTC),
iMessage,Incoming,2013-02-11 19:13:50 (UTC),Maybe-she sometimes shows up weird to Phil. Let me check with her to see if she wants to be included. Otherwise maybe we let the initial meeting go then draw her in for the follow ups that will happen?,,SUSAN MARTINO-CATT (,SUSAN MARTINO-CAT
iMessage, Outgoing, 2013-02-11 19:25:41 (UTC), Well, its odd that the chem reg lead for gly, who also chairs rereg for the jgtf, is taking a backseat to sachs and soteres on an issue that could effect the terms of the registration. I'm afraid they'll own it from here fwd when they should be in a support role, Self, SUSAN MARTINO-CATT ((), Self, 2013-02-11 19:25:44 (UTC),
iMessage,Incoming,2013-02-11 19:32:54 (UTC),Ok. Agree with you on this, will include her from the start. "SUSAN MARTINO-CATT ("SUSAN M
iMessage,Outgoing,2013-03-05 18:42:23 (UTC), Jess doing a nice job at EPA,,Self,SUSAN MARTINO-CATT (Self,O.,2013-03-05 18:42:24 (UTC), SMS,Outgoing,2013-05-31 19:27:20 (UTC),FYI. We told usda that we have optimized gel based methods
last week and sent them optimized conditions. "Self,PHILIP MILLER (()), Self,O,,, SMS,Outgoing,2013-06-05 15:42:25 (UTC),We have never had confirmation glyphosate was applied, or the conditions under which it was applied and the label language states wheat over 18" could be difficult
to control, Self,PHILIP MILLER (, , Self,0, , SMS,Incoming,2013-06-05 16:28:37 (UTC),Yep,,PHILIP MILLER (,),PHILIP MILLER (,), Self,0,2013-06-05 16:33:15 (UTC),
iMessage,Outgoing,2014-09-10 17:43:34 (UTC),I will likely get a letter from epa tomorrow re wrm stewardship for dicamba. Spoke 1x1 w jack h today for an hour. Hopefully we can catch up manana,,Self,SUSAN MARTINO-CATT (), Self,0,,2014-09-10 17:43:38 (UTC),
iMessage,Incoming,2014-09-10 17:44:32 (UTC),Ok. Your guy feel in this?,,SUSAN MARTINO-CATT (,SUSAN MARTINO-CATT (,SUSAN MARTINO-CATT (,SUSAN MARTINO-CATT (,SUSAN MARTINO-CATT (,SUSAN MARTINO-CATT (,SUSAN MARTINO-CATT (
), SUSAN MARTINO-CATT (
iMessage, Outgoing, 2014-09-10 17:52:10 (UTC), Prelude to come to jesus is my thought. Jack told me (it is not a surprise) that whatever is done on this matter for 2,4-d and dicamba will next be applied to glyphosate. Get ready for the protection of glyphosate to be a matter of public good, Self, SUSAN MARTINO-CATT (), Self, 0, 2014-09-10 17:52:10 (UTC),
iMessage, Incoming, 2014-09-10 17:53:04 (UTC), As we suspected. Sounds like they are locked and we won't be able to move. Hopefully it is something we can live with. Tried to listen to the webinar but our firewall is blocking access. "SUSAN MARTINO-CATT (), SUSAN MARTINO-CATT (), SUSAN MARTINO-CATT ()
iMessage,Outgoing,2014-10-20 14:28:15 (UTC),Jan 15th epa will not happen given comment periods and sequential process w usda,,Self,SUSAN MARTINO-CATT (14:28:19 (UTC),
iMessage,Incoming,2014-10-20 14:29:08 (UTC),Agreed-last I heard was mar so that must have meant with states. ,,SUSAN MARTINO-CATT (Self,0,2014-10-20 15:20:53 (UTC),
iMessage, Incoming, 2014-10-20 14:29:41 (UTC), Not ideal, will have GLY and gluf, SUSAN MARTINO-CATT ((CATT), SUSAN MARTINO-CATT ((CATT), SUSAN MARTINO-CATT), Self, 0, 2014-10-20 15:20:53 (UTC),
iMessage,Outgoing,2014-10-20 15:21:20 (UTC),You good w everything we've said?,,Self,SUSAN MARTINO-CATT (), Self,0,,2014-10-20 15:21:24 (UTC), iMessage,Incoming,2014-10-20 15:24:03 (UTC),Yes excellent positioning-they are getting it. ,,SUSAN
MARTINO-CATT ((USAN MARTINO-CATT () (U

Monsanto's Philosophy



The Jury's Verdict

Did Roundup Pro® or Ranger Pro® fail to perform as safely as an ordinary consumer would have expected when used or misused in an intended or reasonably foreseeable way?	Was the Roundup Pro® or Ranger Pro® design a substantial factor in causing harm to Mr. Johnson?	
Yes No	Yes No No	
Did Roundup Pro® or Ranger Pro® have potential risks that were known or knowable in light of the scientific knowledge that was generally accepted in the scientific community at the time of their manufacture, distribution or sale?	Did the potential risks of Roundup Pro® or Ranger Pro® present a substantial danger to persons using or misusing Roundup Pro® or Ranger Pro® in an intended or reasonably foreseeable way?	
Yes No No	Yes No No	

Would ordinary consumers have recognized the Yes	No X	nably have known that Roundup Pro® or Ranger be dangerous when used or misused in a No
Did Monsanto know or should it reasonably have known t danger? Yes X	hat users would not realize the	evidence that Monsanto acted with malice or you base your finding of liability in favor of Mr. No