

2,4-D/TOX

315 (14)

January 24, 1977

Response to 12/15/76 note of Mr. E. Johnson, DAA, OPP, regarding "new data on oncogenicity" of 2,4-dichlorophenoxyacetic acid (2,4-D) "from Jim Michie," comment on.



Dr. M. L. Quaife  
Toxicology Branch, RD (WH-567)

Dr. O. E. Paynter  
Chief, Toxicology Branch (WH-567)

The documents given me by you which relate to toxicology of "2,4-D" comprise two reports by Dr. Robert T. Habermann, Pathologist at FDA, to Dr. A. J. Lehman, FDA. One (11/5/63) is on pathological changes in dogs fed 2,4-D for 2 years, and one (3/20/64) is on pathological changes in rats fed it for 2 years. The rat study report states (on p. 4 of the report), "No microscopic change was attributable to treatment." (The 2-yr dog study is not suitable as a carcinogenicity study.)

The published report on these same two studies, "Chronic toxicity of 2,4-dichlorophenoxyacetic acid in rats and dogs," by W. H. Hansen et al., Tox. Appl. Pharmacol. 20, 122-9 (1971), also finds the rat study negative for carcinogenicity of 2,4-D. It states (p. 126): "The raw data, however, support the pathological interpretation that a carcinogenic effect of 2,4-D has not been shown." Results of these studies have been used in assessing safety of requested tolerances for 2,4-D at EPA.

Summary: In sum, no new data (on carcinogenicity studies) are contained in the documents accompanying Mr. E. Johnson's memo. The data were evaluated by the original workers (Drs. Habermann and Fitzhugh and Mr. Hansen) at FDA and found negative with respect to the carcinogenicity of 2,4-dichlorophenoxyacetic acid.

MLQuaife/ccw 1/24/77

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