

Goldstein, Daniel 2018-02-27 Final Played in Court

Goldstein, Daniel 02-27-2018

Total Time 01:01:19



Page/Line

Source

ID

7:1 - 8:2

Goldstein, Daniel 02-27-2018 (00:00:35)

GD2018.1

7:1 DANIEL A. GOLDSTEIN, M.D.,

7:2 of lawful age, having been first duly sworn

7:3 to tell the truth, the whole truth and

7:4 nothing but the truth, deposes and says on

7:5 behalf of the Plaintiff, as follows:

7:6

7:7 DIRECT EXAMINATION

7:8 QUESTIONS BY MR. MILLER:

7:9 Q. Good morning.

7:10 A. Good morning.

7:11 Q. And please state your full

7:12 name.

7:13 A. Daniel A. Goldstein.

7:14 Q. And you're a medical doctor?

7:15 A. I am.

7:16 Q. I will refer to you then as

7:17 Dr. Goldstein.

7:18 A. Thank you.

7:19 Q. Okay. And you work for the

7:20 Monsanto Company?

7:21 A. I do.

7:22 Q. And how long have you worked

7:23 for the Monsanto Company?

7:24 A. It will be 20 years in May.

7:25 Q. Okay. Part of your job

8:1 responsibility at Monsanto is to deal with

8:2 complaints and consumer safety; is that fair?

8:5 - 8:9

Goldstein, Daniel 02-27-2018 (00:00:10)

GD2018.2

8:5 THE WITNESS: I would narrow

8:6 that somewhat. I -- being a

8:7 physician, I'm more focused on

8:8 concerns and complaints related to

8:9 human health.

8:14 - 9:8

Goldstein, Daniel 02-27-2018 (00:00:34)

GD2018.3

8:14 You're also a toxicologist?

8:15 A. Yes, an MD toxicologist or a

8:16 clinical toxicologist, that is correct.

8:17 Q. All right. And so you review

8:18 complaints of human health that would come to

Page/Line	Source	ID
	8:19 Monsanto from people that perceive rightfully 8:20 or wrongfully that a product of Monsanto has 8:21 caused them an ill effect; is that a fair 8:22 statement? 8:23 A. I would review some of them. I 8:24 may not see all of them. 8:25 Q. I understand. 9:1 And how long have you generally 9:2 speaking been performing that job function at 9:3 Monsanto? 9:4 A. The entire time that I've been 9:5 with the company. 9:6 Q. Okay. And it's a full-time 9:7 position at Monsanto? 9:8 A. It is.	
14:2 - 14:6	Goldstein, Daniel 02-27-2018 (00:00:10) 14:2 Q. And before we look at them, you 14:3 and I can agree that before a company sells a 14:4 product, it has to do some reasonable attempt 14:5 to determine whether that product causes 14:6 cancer; isn't that fair?	GD2018.4
14:10 - 14:13	Goldstein, Daniel 02-27-2018 (00:00:08) 14:10 THE WITNESS: I don't think I 14:11 can state that as a generalization. 14:12 It depends on the nature of the 14:13 product and its intended use.	GD2018.5
21:10 - 21:14	Goldstein, Daniel 02-27-2018 (00:00:13) 21:10 Q. Okay. Have you ever told 21:11 anyone that called or reached out to Monsanto 21:12 that there was an association reported in the 21:13 scientific literature between glyphosate and 21:14 any form of non-Hodgkin's lymphoma?	GD2018.8
21:17 - 21:20	Goldstein, Daniel 02-27-2018 (00:00:03) 21:17 THE WITNESS: Yes, I have. 21:18 QUESTIONS BY MR. MILLER: 21:19 Q. And when did you start doing 21:20 that?	GD2018.9
21:23 - 22:13	Goldstein, Daniel 02-27-2018 (00:00:42) 21:23 THE WITNESS: I began to do 21:24 that after the IARC decision, which	GD2018.10

Page/Line

Source

ID

21:25 would have been in, I guess, early
 22:1 2015, early 2014 --
 22:2 QUESTIONS BY MR. MILLER:
 22:3 Q. March 2015, I don't mean to
 22:4 interrupt, but --
 22:5 A. Yeah. Yeah.
 22:6 So after the IARC decision,
 22:7 that is the first ever report of such an
 22:8 allegation that was determined by a -- an
 22:9 agency. I won't call it a regulatory agency.
 22:10 It isn't a regulatory agency. But that
 22:11 report certainly prompted some concerns and a
 22:12 number of people called and we discussed that
 22:13 report.

43:10 - 43:16

Goldstein, Daniel 02-27-2018 (00:00:17)

GD2018.11

43:10 Q. And you had said to your other
 43:11 colleagues that you expected IARC to either
 43:12 classify glyphosate as a possible human
 43:13 carcinogen or if things are really bad, a
 43:14 probable human carcinogen.
 43:15 Do you remember having that
 43:16 general conversation?

43:22 - 44:1

Goldstein, Daniel 02-27-2018 (00:00:10)

GD2018.12

43:22 THE WITNESS: I stated in a
 43:23 number of places and in conversations
 43:24 that that was my expectation; however,
 43:25 that conclusion is not supported by
 44:1 the science.

47:3 - 47:4

Goldstein, Daniel 02-27-2018 (00:00:02)

GD2018.13

47:3 Have you seen this before, sir?
 47:4 A. Yes, I have.

DG5.1

61:22 - 61:25

Goldstein, Daniel 02-27-2018 (00:00:06)

GD2018.18

61:22 Q. One of your jobs at Monsanto is
 61:23 to manage the punitive damage liability
 61:24 arising from all of this, right,
 61:25 Dr. Goldstein?

clear

62:4 - 62:8

Goldstein, Daniel 02-27-2018 (00:00:05)

GD2018.19

62:4 THE WITNESS: My role is
 62:5 strictly in a medical capacity. I
 62:6 don't manage liability.

Page/Line	Source	ID
62:22 - 63:7	<p>62:7 (Goldstein Exhibit 7 marked for 62:8 identification.)</p> <p>Goldstein, Daniel 02-27-2018 (00:00:31)</p> <p>62:22 Q. All right. This Exhibit 7 is 62:23 an e-mail sent by you in 2004, June, right, 62:24 sir?</p> <p>62:25 A. Yes, that is correct.</p> <p>63:1 Q. And it's about Roundup, right, 63:2 sir?</p> <p>63:3 A. Yes.</p> <p>63:4 Q. And you state here in part, 63:5 quote, "Some people take -- seem to take 63:6 offense at the idea of helping us manage our 63:7 punitive damage liability."</p>	<p>GD2018.20</p> <p>DG7.1</p> <p>DG7.1.1</p>
63:15 - 64:2	<p>Goldstein, Daniel 02-27-2018 (00:00:38)</p> <p>63:15 Q. We'll read the whole thing. 63:16 This is what you said in June of 2004, quote, 63:17 "Some people seem to take offense at the idea 63:18 of helping us manage our punitive damage 63:19 liability, often without realizing that, 63:20 quote, 'doing the right thing,' and quote, 63:21 'managing liability,' are oftentimes one and 63:22 the same." 63:23 Did I read that correctly, sir? 63:24 A. You did. 63:25 Q. And so would it be fair to say 64:1 that managing punitive damages is one of your 64:2 job titles, right, sir?</p>	GD2018.21
64:6 - 64:16	<p>Goldstein, Daniel 02-27-2018 (00:00:25)</p> <p>64:6 THE WITNESS: No, that's not 64:7 correct. This was part of a 64:8 discussion between myself and someone 64:9 at the college of medical toxicology 64:10 regarding transmission of information 64:11 and the reasons for transmitting that 64:12 information. It has nothing to do 64:13 with my specific job role at all. 64:14 QUESTIONS BY MR. MILLER: 64:15 Q. And that was in 2004, right? 64:16 A. Yes.</p>	<p>GD2018.22</p> <p>clear</p>

Page/Line	Source	ID
72:18 - 72:20	Goldstein, Daniel 02-27-2018 (00:00:05) 72:18 Q. One of your jobs, 72:19 Dr. Goldstein, was to play Whac-A-Mole with 72:20 problems that came up in Roundup, right?	GD2018.23
72:23 - 73:7	Goldstein, Daniel 02-27-2018 (00:00:21) 72:23 THE WITNESS: Well, playing 72:24 Whac-A-Mole was not part of the job 72:25 description. I think it's something 73:1 that we use as jargon internally; 73:2 issues pop up and we're called upon to 73:3 deal with them. 73:4 QUESTIONS BY MR. MILLER: 73:5 Q. Okay. And issues would pop up 73:6 concerning Roundup, right? You played 73:7 Whac-A-Mole with those issues, right?	GD2018.24
73:11 - 73:18	Goldstein, Daniel 02-27-2018 (00:00:10) 73:11 THE WITNESS: Issues would come 73:12 up and we would endeavor to address 73:13 them. 73:14 (Goldstein Exhibit 10 marked 73:15 for identification.) 73:16 QUESTIONS BY MR. MILLER: 73:17 Q. Let's take a look at 73:18 Exhibit 10, an e-mail sent by you and others	GD2018.25
73:19 - 73:19	Goldstein, Daniel 02-27-2018 (00:00:03) 73:19 at Monsanto. A copy for you and counsel.	DG10.1 GD2018.86
73:20 - 74:1	Goldstein, Daniel 02-27-2018 (00:00:17) 73:20 All right. Sir, let's look at 73:21 the first page. This is an e-mail from you, 73:22 March 3, 2010, Daniel Goldstein, right, sir? 73:23 A. Yes. 73:24 Q. And it's sent to Eric Sachs and 73:25 Donna Farmer, two other employees at 74:1 Monsanto, right?	GD2018.85 DG10.1.1
74:4 - 74:8	Goldstein, Daniel 02-27-2018 (00:00:09) 74:4 THE WITNESS: Yes. 74:5 QUESTIONS BY MR. MILLER: 74:6 Q. And subject matter is another 74:7 mole needing a whacking, right? 74:8 A. That is correct, yes.	GD2018.26 DG10.1.2

Page/Line	Source	ID
74:14 - 75:7	Goldstein, Daniel 02-27-2018 (00:00:43) 74:14 Q. Did you write this e-mail, 74:15 Dr. Goldstein? 74:16 A. I wrote the second e-mail down. 74:17 I did not create that title. That title or 74:18 subject line actually came externally from 74:19 Dr. Bruce Chassy. 74:20 Q. Let's read the part that you 74:21 created. "Two comments. One: Funny you 74:22 should say that, Donna Farmer, glyphosate 74:23 tox, and I have been playing" -- 74:24 What, sir? 74:25 A. Whac-A-Mole. 75:1 Q. -- "for years," right? 75:2 A. Yes. 75:3 Q. "And calling it just that. We 75:4 were joking about it yesterday. " 75:5 Did I read that correctly? 75:6 A. That's correct. It's humor. 75:7 Q. Yes.	GD2018.27
75:17 - 75:19	Goldstein, Daniel 02-27-2018 (00:00:09) 75:17 Q. You knew, sir, in 2015 that 75:18 Monsanto has very limited credibility when 75:19 talking about the safety of glyphosate, true?	GD2018.28 clear
75:22 - 76:3	Goldstein, Daniel 02-27-2018 (00:00:08) 75:22 THE WITNESS: Like any 75:23 manufacturer, we have some limitations 75:24 on our credibility when we are 75:25 speaking as Monsanto publicly. 76:1 (Goldstein Exhibits 11 and 12 76:2 marked for identification.) 76:3 QUESTIONS BY MR. MILLER:	GD2018.29
76:9 - 76:10	Goldstein, Daniel 02-27-2018 (00:00:08) 76:9 Exhibit 11. And there's our attachment there 76:10 we're going to mark as Exhibit 12.	GD2018.30
76:19 - 76:21	Goldstein, Daniel 02-27-2018 (00:00:06) 76:19 And this is an e-mail from John 76:20 Acquavella. You know him, right? 76:21 A. Yes, I do.	GD2018.31 DG11.1.1
77:4 - 77:19	Goldstein, Daniel 02-27-2018 (00:00:38)	GD2018.32

Page/Line

Source

ID

77:4 Q. Who's John Acquavella?

77:5 A. John Acquavella is an

77:6 epidemiologist who at that time would have

77:7 been employed at Monsanto.

77:8 Q. And one of his jobs was to

77:9 review any scientific articles that came out

77:10 on the issue of glyphosate and its potential

77:11 associations with any condition, fair?

77:12 A. Yes.

77:13 Q. Okay.

77:14 A. I think that's fair.

77:15 Q. And so in this May 2000, year

77:16 2000, e-mail John Acquavella is writing an

77:17 e-mail and its subject is non-Hodgkin's

77:18 lymphoma abstract, isn't it, sir?

77:19 A. Yes.

78:17 - 78:20

Goldstein, Daniel 02-27-2018 (00:00:05)

GD2018.33

78:17 Q. At the meeting where

DG12.1

78:18 Dr. McDuffie presented her findings in

78:19 abstract form?

78:20 A. Correct.

81:24 - 82:15

Goldstein, Daniel 02-27-2018 (00:00:43)

GD2018.34

81:24 This scientist, Dr. McDuffie,

DG12.1.1

81:25 together with one, two, three, four, five,

82:1 six authors at a scientific meeting on

82:2 August 21 of 2000, the date of the document,

82:3 looks at non-Hodgkin's lymphoma and certain

82:4 agriculture exposures and in B states -- and

82:5 let me read it -- quote, "More than two days

DG12.1.2

82:6 per year of exposure to glyphosate resulted

82:7 in an OR" --

82:8 And I'm asking you now, sir,

82:9 what is an OR?

82:10 A. That would refer to an odds

82:11 ratio in this context.

82:12 Q. Yes, sir.

82:13 -- "of 2.11"; is that right,

82:14 sir?

82:15 A. Yes.

82:22 - 83:2

Goldstein, Daniel 02-27-2018 (00:00:10)

GD2018.35

Page/Line

Source

ID

82:22 A. That is what the document says,

82:23 odds ratio 2.11.

82:24 Q. Yes, sir.

82:25 And with a statistically

83:1 significant confidence interval, right?

83:2 A. Yes.

84:15 - 84:20

Goldstein, Daniel 02-27-2018 (00:00:19)

GD2018.36

84:15 Q. Well, let me show you a memo

DG13.1

84:16 prepared by John Acquavella and sent to you

84:17 on August 24, 2000, the year 2000, several

84:18 days after our last exhibit, discussing this

84:19 study and ask you a few questions about it.

84:20 Okay?

84:21 - 84:22

Goldstein, Daniel 02-27-2018 (00:00:06)

GD2018.87

84:21 Marked as Exhibit 13. A copy

84:22 for you, sir, and a copy for counsel.

84:23 - 85:20

Goldstein, Daniel 02-27-2018 (00:01:10)

GD2018.89

84:23 Now, this document is marked

DG13.1.1

84:24 "Monsanto Private."

84:25 See that, sir?

85:1 A. Yes.

85:2 Q. And it's from John Acquavella,

85:3 who you've told us was an epidemiologist

85:4 employed at the time by Monsanto, right?

85:5 A. Yes.

85:6 Q. And it was sent to you, among

DG13.1.2

85:7 others, right? You and Donna Farmer both

85:8 received this it looks like?

85:9 A. That is correct.

85:10 Q. Yes, sir.

85:11 It says in paragraph 1 that,

85:12 quote, "Non-Hodgkin's lymphoma and the

DG13.1.3

85:13 pesticide hypothesis: dose response," end

85:14 quote, by Helen McDuffie.

85:15 Do you see that, and others?

85:16 A. Yes.

85:17 Q. All right, sir. And what John

85:18 Acquavella goes on to say about this in the

DG13.2

85:19 year 2000, if you please turn with me to the

85:20 next page, it tells us "additional analysis

DG13.2.1

Page/Line	Source	ID
85:21 - 85:25	Goldstein, Daniel 02-27-2018 (00:00:15) 85:21 found a significant relationship for more 85:22 than two days use/year for glyphosate." And 85:23 he lists the odds ratio that we discussed in 85:24 the last document. 85:25 Do you see that, sir?	GD2018.88
86:7 - 86:16	Goldstein, Daniel 02-27-2018 (00:00:26) 86:7 A. Yes, I do. 86:8 Q. And John Acquavella actually 86:9 had a chance to speak to the author, 86:10 Dr. McDuffie, and he reports on that. He 86:11 tells us, quote, "I had the opportunity to 86:12 spend some time with the author. She struck 86:13 me as a reasonable person." 86:14 So at least John Acquavella 86:15 thought that this scientist who reported this 86:16 paper was a reasonable person, right?	GD2018.37 DG13.2.2
86:19 - 87:2	Goldstein, Daniel 02-27-2018 (00:00:17) 86:19 THE WITNESS: I have no idea 86:20 what he meant to imply by using that 86:21 term. 86:22 QUESTIONS BY MR. MILLER: 86:23 Q. Well, one thing he expressly 86:24 states is, "She doesn't seem to have any 86:25 preconceived notions about glyphosate," 87:1 right?	GD2018.38 DG13.2.3
87:3 - 87:3	Goldstein, Daniel 02-27-2018 (00:00:02) 87:3 Q. So by the time the article	GD2018.90 clear
87:4 - 87:9	Goldstein, Daniel 02-27-2018 (00:00:18) 87:4 comes out, the full article, for McDuffie in 87:5 November of 2001, you and Donna Farmer were 87:6 very happy that if someone searched that 87:7 article, they couldn't find glyphosate in the 87:8 abstract. 87:9 Did you remember that?	GD2018.91
87:12 - 87:24	Goldstein, Daniel 02-27-2018 (00:00:23) 87:12 THE WITNESS: I remember that 87:13 there was some conversation of that 87:14 nature.	GD2018.39

Page/Line	Source	ID
	87:15 (Goldstein Exhibit 14 marked 87:16 for identification.)	clear
	87:17 QUESTIONS BY MR. MILLER:	
	87:18 Q. Let's take a look at it,	
	87:19 Exhibit 12. I'm sorry, we're going to mark	
	87:20 this as Exhibit 14. Excuse me, Exhibit 14.	DG14.1
	87:21 This is a series of e-mails	
	87:22 produced by Monsanto. I'm going to ask you a	
	87:23 few questions about them. A copy for you and	
	87:24 counsel.	
87:25 - 88:17	Goldstein, Daniel 02-27-2018 (00:00:38)	GD2018.92
	87:25 So this is on November 29,	DG14.1.1
	88:1 2001?	
	88:2 A. Yes.	
	88:3 Q. From Donna Farmer to John	
	88:4 Acquavella and you and others, right?	
	88:5 A. Yes.	
	88:6 Q. And it's about the McDuffie	
	88:7 article?	
	88:8 A. Correct.	
	88:9 Q. And the subject is glyphosate	
	88:10 not mentioned in the abstract.	
	88:11 It's still in the article, but	
	88:12 it's not in the abstract, right?	
	88:13 A. Yeah, let me look at the	
	88:14 document for a moment, if I could.	
	88:15 Q. Yes, sir.	
	88:16 A. The formatting is a bit odd, so	
	88:17 it's difficult to read. Okay. Sorry.	
88:18 - 89:6	Goldstein, Daniel 02-27-2018 (00:00:39)	GD2018.93
	88:18 Q. What Donna Farmer was writing	
	88:19 to you and others about at Monsanto was, "I	DG14.1.2
	88:20 know we don't know yet what it says in the	
	88:21 small print, but the fact that glyphosate is	
	88:22 no longer mentioned in the abstract is a huge	
	88:23 step forward. It removes it from being	
	88:24 picked up by abstract searches, exclamation	
	88:25 point."	
	89:1 Do you see that?	
	89:2 A. Yes, I do.	

Page/Line	Source	ID
89:9 - 89:13	<p>89:3 Q. So she was happy that people 89:4 wouldn't be able to find the findings about 89:5 glyphosate in an abstract search; that's what 89:6 that says?</p> <p>Goldstein, Daniel 02-27-2018 (00:00:09)</p> <p>89:9 THE WITNESS: I can't tell you 89:10 what was in her mind at the time. I 89:11 neither wrote it nor agreed with it in 89:12 the correspondence, but that is what 89:13 the document says.</p>	GD2018.40
89:14 - 89:21	<p>Goldstein, Daniel 02-27-2018 (00:00:21)</p> <p>89:14 QUESTIONS BY MR. MILLER: 89:15 Q. Well, that was on 89:16 November 29th. Seven, eight days later you 89:17 were copied on another e-mail from another 89:18 Monsanto employee discussing the same issue 89:19 and happy that it wasn't in the abstract any 89:20 longer.</p>	GD2018.123
89:24 - 90:8	<p>89:21 Do you remember that?</p> <p>Goldstein, Daniel 02-27-2018 (00:00:23)</p> <p>89:24 THE WITNESS: I don't recall 89:25 that without seeing the document. 90:1 (Goldstein Exhibit 15 marked 90:2 for identification.) 90:3 QUESTIONS BY MR. MILLER: 90:4 Q. Sure, understandable. 90:5 Here's Exhibit 15, six days</p>	clear GD2018.41
90:12 - 90:17	<p>90:6 later, an e-mail chain from Donna Farmer to 90:7 you and others and there's, we're going to 90:8 talk about the bottom here, William Heydens.</p> <p>Goldstein, Daniel 02-27-2018 (00:00:13)</p> <p>90:12 So this is an e-mail chain and 90:13 the one I want to ask about is from William 90:14 Heydens to you and John Acquavella on 90:15 December 6, 2001, about the same issue, the 90:16 McDuffie paper. 90:17 Do you see that, sir?</p>	DG15.1.1 GD2018.42
90:20 - 91:15	<p>Goldstein, Daniel 02-27-2018 (00:00:43)</p> <p>90:20 THE WITNESS: Yes. 90:21 QUESTIONS BY MR. MILLER:</p>	DG15.1.2 GD2018.43

Page/Line

Source

ID

90:22 Q. So -- and who is Bill Heydens
90:23 or William Heydens?

90:24 A. Bill Heydens is a regulatory
90:25 toxicologist.

91:1 Q. Employed by Monsanto?

91:2 A. Yes, that's correct.

91:3 Q. Okay. And so he writes, "John,
91:4 so if I understand the situation correctly,
91:5 even though the reference to glyphosate
91:6 wasn't removed entirely, there was a
91:7 substantial reduction in emphasis, including,
91:8 but not limited to, removal from the
91:9 abstract."

91:10 Did I read that correctly?

91:11 A. You did.

91:12 Q. Why was it such a big deal to
91:13 make it so people couldn't search abstracts
91:14 and find the association between glyphosate
91:15 and non-Hodgkin's lymphoma?

91:21 - 92:2

Goldstein, Daniel 02-27-2018 (00:00:17)

91:21 THE WITNESS: Honestly, I don't
91:22 know what the writers were thinking at
91:23 the time. What matters to me is the
91:24 data and so I don't know what the
91:25 individuals who were making those
92:1 statements at the time were trying to
92:2 imply.

92:3 - 92:7

Goldstein, Daniel 02-27-2018 (00:00:12)

92:3 QUESTIONS BY MR. MILLER:

92:4 Q. In 2003, more independent,
92:5 scientifically published data came out
92:6 showing the association between glyphosate
92:7 and non-Hodgkin's lymphoma, true?

92:10 - 92:20

Goldstein, Daniel 02-27-2018 (00:00:16)

92:10 THE WITNESS: I don't remember
92:11 the exact dates for the various
92:12 publications. If you have a document
92:13 that would refresh my memory, it would
92:14 be helpful.

92:15 (Goldstein Exhibit 16 marked

DG15.1.3

GD2018.44

clear

GD2018.124

clear

GD2018.45

Page/Line	Source	ID
	92:16 for identification.)	
	92:17 QUESTIONS BY MR. MILLER:	
	92:18 Q. I do. Let's look at	
	92:19 Exhibit 16, an e-mail from John Acquavella to	DG16.1
	92:20 you in 2003.	
92:21 - 93:22	Goldstein, Daniel 02-27-2018 (00:00:58)	GD2018.94
	92:21 A. Yes.	
	92:22 Q. So let's take a look at this	
	92:23 e-mail. This is again from the	
	92:24 epidemiologist at Monsanto, John Acquavella,	DG16.1.1
	92:25 right?	
	93:1 A. Correct.	
	93:2 Q. And it's in September of 2003?	
	93:3 A. Yes.	
	93:4 Q. And it's sent to you, Donna	
	93:5 Farmer and others at Monsanto, right, sir?	
	93:6 A. That's correct.	
	93:7 Q. And it's regarding -- an	
	93:8 article that is regarding non-Hodgkin's	
	93:9 lymphoma and glyphosate and some other	
	93:10 chemical, right?	
	93:11 A. That is correct.	
	93:12 Q. All right, sir.	
	93:13 And it states that it's about	
	93:14 the De Roos paper, which is -- we'll call	DG16.1.2
	93:15 that 2003 De Roos.	
	93:16 Okay?	
	93:17 A. Yes.	
	93:18 Q. Okay. And it says in pertinent	
	93:19 part that this paper -- this is a paper from	DG16.1.3
	93:20 investigators at the National Cancer	
	93:21 Institute, right?	
	93:22 A. Correct.	
94:11 - 94:23	Goldstein, Daniel 02-27-2018 (00:00:37)	GD2018.46
	94:11 And what John Acquavella, the	
	94:12 epidemiologist at Monsanto, tells us here is	DG16.1.4
	94:13 that, "Strangely glyphosate looks to be one	
	94:14 of the pesticides most associated with	
	94:15 non-Hodgkin's lymphoma in this analysis."	
	94:16 Did I read that correctly?	

Page/Line	Source	ID
	94:17 A. You did, and then he goes on to 94:18 explain the reasons why he finds that to be 94:19 unusual.	
	94:20 Q. And he also states that this is 94:21 going to "add more fuel to the fire for 94:22 Hardell." 94:23 Who is Hardell?	DG16.1.5
95:2 - 95:9	Goldstein, Daniel 02-27-2018 (00:00:15) 95:2 THE WITNESS: Hardell is a 95:3 scientist who had previously published 95:4 on the topic of non-Hodgkin's lymphoma 95:5 and glyphosate. 95:6 QUESTIONS BY MR. MILLER: 95:7 Q. And Hardell had found an 95:8 association in his study between glyphosate 95:9 and non-Hodgkin's lymphoma?	GD2018.47
95:12 - 96:3	Goldstein, Daniel 02-27-2018 (00:00:49) 95:12 THE WITNESS: It was reported 95:13 in that study. Without looking at the 95:14 study, I don't remember the 95:15 statistical significance. 95:16 QUESTIONS BY MR. MILLER: 95:17 Q. John Acquavella, Monsanto's 95:18 epidemiologist, closes with, "It looks like 95:19 non-Hodgkin's lymphoma and other 95:20 lymphopietic cancers continue to be the main 95:21 cancer epidemiology issues for both 95:22 glyphosate," and the other drug, right? 95:23 A. The other herbicide. 95:24 Q. Yes, another herbicide. 95:25 "We're assembling a panel of 96:1 experts to work on this." 96:2 Did I read that correct? 96:3 A. Yes, you did.	GD2018.48
	95:17 Q. John Acquavella, Monsanto's 95:18 epidemiologist, closes with, "It looks like 95:19 non-Hodgkin's lymphoma and other 95:20 lymphopietic cancers continue to be the main 95:21 cancer epidemiology issues for both 95:22 glyphosate," and the other drug, right? 95:23 A. The other herbicide.	DG16.1.6
	95:24 Q. Yes, another herbicide. 95:25 "We're assembling a panel of 96:1 experts to work on this." 96:2 Did I read that correct? 96:3 A. Yes, you did.	DG16.1.7
96:4 - 96:8	Goldstein, Daniel 02-27-2018 (00:00:12) 96:4 Q. I'm no scientist, but one way a 96:5 chemical can cause a cancer is by damaging 96:6 the DNA of a cell. 96:7 Is that a fair understanding 96:8 that us lay people should have?	GD2018.95 clear

Page/Line	Source	ID
96:11 - 96:18	<p>Goldstein, Daniel 02-27-2018 (00:00:17)</p> <p>96:11 THE WITNESS: That is one 96:12 mechanism by which a chemical could 96:13 contribute to risk of cancer. 96:14 QUESTIONS BY MR. MILLER: 96:15 Q. Yes, sir. 96:16 And by 2007, you knew it was 96:17 old news that glyphosate damaged the DNA of 96:18 cells, right, sir?</p>	GD2018.49
96:21 - 97:9	<p>Goldstein, Daniel 02-27-2018 (00:00:29)</p> <p>96:21 THE WITNESS: No, that would be 96:22 counter to all of the regulatory 96:23 determinations that I'm familiar with. 96:24 There certainly is an extensive body 96:25 of genotoxicity data, but my belief is 97:1 that the weight of the evidence 97:2 supports nongenotoxic effect. 97:3 (Goldstein Exhibit 17 marked 97:4 for identification.) 97:5 QUESTIONS BY MR. MILLER: 97:6 Q. Let's take a look at an e-mail 97:7 chain from 2007 between you and others at 97:8 Monsanto on this issue. Here's a copy for 97:9 you and counsel, sir.</p>	GD2018.50
97:10 - 98:10	<p>Goldstein, Daniel 02-27-2018 (00:01:08)</p> <p>97:10 You've seen this before, right, 97:11 sir? 97:12 A. Yes, I have. 97:13 Q. Let's look at the article that 97:14 you and Monsanto employees are discussing, 97:15 which is the second page of Exhibit 17. 97:16 And what it tells us is that 97:17 aerial spraying of herbicide damages DNA. 97:18 That's the title anyway, right? 97:19 A. Yes. 97:20 Q. And what this reports is, 97:21 quote, "Aerial spraying of a herbicide by the 97:22 Colombian government on the border of 97:23 Colombia and Ecuador has caused a high degree 97:24 of DNA damage in local Ecuadorian people</p>	DG17.1
		GD2018.96
		DG17.2
		DG17.2.1
		DG17.2.2

Page/Line

Source

ID

97:25 according to the study."

98:1 Right?

98:2 A. So this is not a study. This

98:3 is a newspaper article --

98:4 Q. Yes.

98:5 A. -- regarding the underlying

98:6 study.

98:7 Q. That's fair, and thank you for

98:8 that clarification, yes.

98:9 It's called the Miqo study or

98:10 Hermann Miqo study?

98:14 - 99:9

Goldstein, Daniel 02-27-2018 (00:01:01)

GD2018.51

98:14 Q. And I can highlight that. "DNA

DG17.2.3

98:15 damage may activate genes associated to the

98:16 development of cancer, lead researcher Cesar

98:17 Paz y Miqo told sciencedevelopment.net."

98:18 A. You had stated it's called the

98:19 Miqo study. I don't know if that is the

98:20 correct first citation for this. I'm not

98:21 sure which of several studies it actually is

98:22 making reference to.

98:23 Q. All right, sir.

98:24 In any event, you commented on

98:25 the study in the e-mail chain that is

99:1 Exhibit 17. I just want to ask you a few

99:2 questions about that, sir.

99:3 You state -- actually, Eric

99:4 Sachs.

99:5 Now, who is Eric Sachs?

DG17.1.1

99:6 A. Eric Sachs in 2007, well, he

99:7 would have an individual in our scientific

99:8 outreach group I believe at that point in

99:9 time.

99:10 - 99:10

Goldstein, Daniel 02-27-2018 (00:00:04)

GD2018.97

99:10 Q. And what he's telling other

99:11 - 99:20

Goldstein, Daniel 02-27-2018 (00:00:26)

GD2018.98

99:11 employees is -- as he copies you and Donna

DG17.1.2

99:12 Farmer, "Darren and Andy," these other

99:13 employees, he says, quote, "Please engage

99:14 Donna and Dan as this is an old issue and

Page/Line

Source

ID

99:15 they have extensive experience and
99:16 information on this topic."

99:17 Right?

99:18 A. Yes.

99:19 Q. You had been dealing with this

99:20 issue for a while, fair?

99:23 - 99:24

Goldstein, Daniel 02-27-2018 (00:00:04)

GD2018.52

99:23 THE WITNESS: It had certainly

clear

99:24 come up before, yes.

99:25 - 100:9

Goldstein, Daniel 02-27-2018 (00:00:38)

GD2018.100

99:25 (Goldstein Exhibits 18 and 19

100:1 marked for identification.)

100:2 QUESTIONS BY MR. MILLER:

100:3 Q. I want to talk to you now about

100:4 the new Hardell paper in 2008 on these issues

100:5 and ask you about some e-mails that you sent

100:6 or received on the issue, if I can. I have

100:7 copies for you. I'll mark them as

DG18.1

100:8 Exhibit 18.

100:9 Sir, here are copies of 18 and

100:10 - 100:11

Goldstein, Daniel 02-27-2018 (00:00:06)

GD2018.101

100:10 19, the article that these e-mails are

100:11 referencing.

100:12 - 101:3

Goldstein, Daniel 02-27-2018 (00:00:47)

GD2018.99

100:12 All right, sir. Here we are in

100:13 2008, and Andy Hedgecock, that's an employee

DG18.1.1

100:14 at Monsanto, right?

100:15 A. Yes.

100:16 Q. Is e-mailing you and others

100:17 about the Hardell, the new Hardell paper,

100:18 right?

100:19 A. He's actually e-mailing us

100:20 about a variety of articles in the scientific

100:21 literature that had come out in the preceding

100:22 week, among them is this particular paper.

100:23 Q. Sure.

100:24 He attached the new Hardell

DG18.1.2

100:25 paper. He attached something about The

101:1 Chicago Tribune raising a global stink,

101:2 issues, management, Argentina, and other

Page/Line	Source	ID
101:6 - 101:13	101:3 issues, right? Goldstein, Daniel 02-27-2018 (00:00:12)	GD2018.53
	101:6 THE WITNESS: That's correct.	
	101:7 QUESTIONS BY MR. MILLER:	
	101:8 Q. And the importance was high, 101:9 right?	DG18.1.3
	101:10 A. That's what he indicated, yes.	
	101:11 Q. Okay. If it was you and Donna	
	101:12 Farmer in the room, it would be -- we're	
	101:13 playing Whac-A-Mole, aren't we?	
101:16 - 103:4	Goldstein, Daniel 02-27-2018 (00:01:44)	GD2018.54
	101:16 THE WITNESS: No, I wouldn't	
	101:17 characterize this type of response to	
	101:18 epidemiological literature that way,	
	101:19 but we do make an effort to respond to	
	101:20 issues in literature which arises.	
	101:21 QUESTIONS BY MR. MILLER:	
	101:22 Q. And this article by Hardell	DG19.1.1
	101:23 that you're responding to and looking at was	
	101:24 published in a peer-reviewed journal called	
	101:25 the International Journal of Cancer, right?	
	102:1 A. Yes.	
	102:2 Q. And it was by four independent	DG19.1.2
	102:3 scientists, that is, they do not work at	
	102:4 Monsanto, right?	
	102:5 A. Correct, they don't work at	
	102:6 Monsanto.	
	102:7 Q. Okay. And in this	
	102:8 peer-reviewed article entitled, quote,	
	102:9 "Pesticide exposure as risk factor for	DG19.1.3
	102:10 non-Hodgkin's lymphoma including	
	102:11 histopathological subgroup analysis."	
	102:12 You're a doctor. What does	
	102:13 histopathological subgroup analysis mean?	
	102:14 A. They're looking at different	
	102:15 types of non-Hodgkin's lymphoma.	
	102:16 Q. I see. Thank you.	
	102:17 All right. And so what these	
	102:18 independent scientists in this peer-reviewed	
	102:19 journal tell us, if you can please turn to	DG19.5

Page/Line	Source	ID
	102:20 the Bate Stamp 92792, in their peer-reviewed 102:21 study of 2008, they tell us that glyphosate, 102:22 if you use it less than ten days, you have an 102:23 increased risk but it's not statistically 102:24 significant, is it? 102:25 A. No.	DG19.3.1
	103:1 Q. However, if you use glyphosate 103:2 greater than ten days per year, it is 103:3 statistically significant, right? 103:4 A. Yes.	DG19.3.2
105:2 - 105:5	Goldstein, Daniel 02-27-2018 (00:00:11)	GD2018.55
	105:2 Q. What these independent 105:3 scientists concluded from their peer-reviewed 105:4 study in 2008, if you turn with me to 105:5 page 99, please, "Furthermore, our earlier	DG19.6.1
105:6 - 105:12	Goldstein, Daniel 02-27-2018 (00:00:19) 105:6 indication of an association between 105:7 glyphosate and non-Hodgkin's lymphoma has 105:8 been considerably strengthened." 105:9 Did I read that correctly? 105:10 A. That is what they concluded. I 105:11 would say the data are weak, but that is 105:12 their conclusion.	GD2018.102
106:3 - 106:8	Goldstein, Daniel 02-27-2018 (00:00:13) 106:3 The scientists at IARC when 106:4 they spent a week-plus together evaluating 106:5 the science of glyphosate and non-Hodgkin's 106:6 lymphoma looked at scientific, public papers; 106:7 you understand that, right? 106:8 A. Yes.	GD2018.56
106:12 - 106:13	Goldstein, Daniel 02-27-2018 (00:00:02) 106:12 Q. And this Hardell paper was one 106:13 of the papers they looked at?	GD2018.57
106:15 - 106:16	Goldstein, Daniel 02-27-2018 (00:00:01) 106:15 THE WITNESS: Yes, that's 106:16 correct.	GD2018.58
107:14 - 108:1	Goldstein, Daniel 02-27-2018 (00:00:42) 107:14 Q. You know what 107:15 the Shinasi meta-analysis is? 107:16 A. Yes.	GD2018.59 clear

Page/Line

Source

ID

107:17 Q. Okay. And it would be fair to
107:18 say that the Shinasi meta-analysis -- well,
107:19 first of all, explain to the jury what a
107:20 meta-analysis is.

107:21 A. So a meta-analysis is a way of
107:22 taking different epidemiology studies and
107:23 trying to combine those results together in
107:24 order to get additional reliability and
107:25 additional information by using all of the
108:1 available data together.

109:21 - 110:9

Goldstein, Daniel 02-27-2018 (00:00:34)

GD2018.60

109:21 My next question: I've handed
109:22 you Exhibit 20, which is a series of e-mails
109:23 between you and others at Monsanto regarding
109:24 the Shinasi epidemiological paper, and I'd
109:25 like to ask you a few questions about it.

DG20.1

110:1 Okay?

110:2 A. Yes.

110:3 Q. All right, sir.

110:4 So this was -- and here you're
110:5 on the e-mail chain regarding this new paper,
110:6 right, sir?

DG20.1.1

110:7 A. Yes, I'm at least on this first
110:8 e-mail at the top. I guess that would be the
110:9 more recent of the e-mails.

113:10 - 114:7

Goldstein, Daniel 02-27-2018 (00:01:08)

GD2018.61

113:10 says about the Shinasi paper, "The data on
113:11 glyphosate is also worth looking over.
113:12 Table 4, page 4505, summarizes six studies on
113:13 glyphosate and non-Hodgkin's lymphoma, three
113:14 or four of which report significant increases
113:15 in the risk ratio."

DG20.1.2

113:16 Did I read that correctly?

113:17 A. You did, but there was some
113:18 serious issues with the quality of work in
113:19 this paper. And this data was reanalyzed by
113:20 Delzell, and they found a number of
113:21 significant statistical errors in their work
113:22 and -- recalculating it in accordance with
113:23 their own analysis plan, these relationships

Page/Line	Source	ID
	113:24 were no longer anywhere near as statistically 113:25 significant.	
	114:1 Q. You know that the Shinasi paper 114:2 of 2014, this meta-analysis, was one of the 114:3 pieces of scientific evidence upon which IARC 114:4 concluded that glyphosate was a -- probably 114:5 associated with non-Hodgkin's lymphoma. It 114:6 was one of the pieces of evidence used; 114:7 you're aware of that, right?	clear
114:10 - 114:14	Goldstein, Daniel 02-27-2018 (00:00:08) 114:10 THE WITNESS: It was cited in 114:11 their document, so they had looked at 114:12 it, that is correct. I don't think 114:13 they looked at everything, but they 114:14 had looked at that.	GD2018.62
119:15 - 120:3	Goldstein, Daniel 02-27-2018 (00:00:51) 119:15 Q. What is ACSH? 119:16 A. The -- I'm sure it stands for a 119:17 number of things, but in this context you're 119:18 most likely referring to the American Council 119:19 for Science and Health. 119:20 Q. What do you understand they do? 119:21 A. They put out responses for 119:22 public consumption on various scientific 119:23 issues relating to public health. 119:24 Q. And once the IARC decision came 119:25 in, you recommended that Monsanto fund money 120:1 to them so that they would write articles 120:2 saying IARC was wrong about glyphosate. That 120:3 was part of the IARC strategy, right?	GD2018.63
120:7 - 120:19	Goldstein, Daniel 02-27-2018 (00:00:22) 120:7 THE WITNESS: No, you've 120:8 mischaracterized that. 120:9 We support and had supported 120:10 ACSH on and off over the years with 120:11 various grants. What I believe I 120:12 proposed that we do at the time was to 120:13 provide them the scientific literature 120:14 so that they can create whatever 120:15 documents and responses they choose to	GD2018.64

Page/Line	Source	ID
	120:16 create.	
	120:17 (Goldstein Exhibit 22 marked	DG22.1
	120:18 for identification.)	
	120:19 QUESTIONS BY MR. MILLER:	
120:25 - 121:16	Goldstein, Daniel 02-27-2018 (00:00:34)	GD2018.65
	120:25 All right, sir. So this is an	
	121:1 e-mail from you on February 26, 2015, right,	DG22.1.1
	121:2 sir?	
	121:3 A. Correct.	
	121:4 Q. To other employees at Monsanto,	
	121:5 right?	
	121:6 A. To my leadership in the	
	121:7 regulatory and scientific affairs group, yes.	
	121:8 Q. Okay. Regarding ACSH, right?	
	121:9 A. That is correct.	
	121:10 Q. And what does that stand for	
	121:11 again?	
	121:12 A. The American Council on Science	
	121:13 and Health, I believe.	
	121:14 Q. And they were working with you	
	121:15 to respond to IARC if IARC came out with a	
	121:16 decision Monsanto didn't like, right?	
121:21 - 123:2	Goldstein, Daniel 02-27-2018 (00:01:13)	GD2018.66
	121:21 THE WITNESS: They were working	
	121:22 with us only in the sense that I had	
	121:23 raised this issue with Gil Ross, who	
	121:24 was at ACSH, and asked him if they	
	121:25 would be interested in receiving	
	122:1 information regarding IARC so that	
	122:2 they can prepare to respond.	
	122:3 So we don't decide whether they	clear
	122:4 respond. If they do respond, we do	
	122:5 not generate that content, and they're	
	122:6 quite adamant about those parameters.	
	122:7 So, you know, my point here	
	122:8 really was a plea for funding. I	
	122:9 wanted to keep our funding to ACSH. I	
	122:10 believe that they do a lot of good	
	122:11 work. We don't dictate what they	
	122:12 respond to, and we don't dictate what	

Page/Line	Source	ID
	122:13 they say.	
	122:14 QUESTIONS BY MR. MILLER:	
	122:15 Q. Let's see what you said in	
	122:16 February of 2015.	
	122:17 What you stated, sir, were,	
	122:18 quote, "They are working with us to respond,	DG22.1.2
	122:19 if needed, to IARC." True?	
	122:20 A. That is correct, it is what I	
	122:21 had said previously. I had contacted Gil,	
	122:22 knowing that the IARC decision was coming,	
	122:23 and offered to provide him a complete set of	
	122:24 information around the glyphosate and cancer	
	122:25 issues.	
	123:1 Q. He wanted you to feed him	
	123:2 information, right?	
123:5 - 123:14	Goldstein, Daniel 02-27-2018 (00:00:28)	GD2018.67
	123:5 THE WITNESS: I raised the	
	123:6 issue with him and offered to provide	
	123:7 the scientific information to ACSH.	
	123:8 QUESTIONS BY MR. MILLER:	
	123:9 Q. And you stated about whether or	
	123:10 not the financial reward would be there with	
	123:11 ACSH for Monsanto, quote, "While I would love	DG22.1.3
	123:12 to have more friends and more choices, we	
	123:13 don't have a lot of supporters and can't	
	123:14 afford to lose the few we have."	
123:24 - 124:18	Goldstein, Daniel 02-27-2018 (00:00:59)	GD2018.68
	123:24 A. Well, as I stated earlier, this	
	123:25 is an argument for continued funding. I was	
	124:1 essentially making the case internally at	
	124:2 that point in time in our budget cycle that	
	124:3 we needed to support ACSH.	
	124:4 Q. You go on to say, quote, "I am	DG22.1.4
	124:5 well aware of the challenges with ACSH and	
	124:6 know Eric has valid concerns, so I can assure	
	124:7 you I am not all starry-eyed about ACSH.	
	124:8 They have plenty of warts."	
	124:9 What are some of their warts?	
	124:10 A. Well, if you look back at them	
	124:11 historically, some of their positions on	

Page/Line	Source	ID
124:19 - 124:20	<p>124:12 tobacco, some of their positions on lead, are 124:13 not positions that I would agree with. So, 124:14 you know, this is an organization that I 124:15 think at least in the recent past has done 124:16 good quality, science-based work, and I felt 124:17 it was useful for us to continue to support 124:18 them.</p>	GD2018.103
124:21 - 125:17	<p>Goldstein, Daniel 02-27-2018 (00:00:07) 124:19 Q. Let's go a couple pages back, 124:20 if we could, sir, to page 9478.</p> <p>Goldstein, Daniel 02-27-2018 (00:00:50) 124:21 This is an e-mail from you to 124:22 Tracey about the glyphosate IARC assessment, 124:23 right, sir? 124:24 A. Yes. 124:25 Q. This was about eight hours 125:1 before the one we just read, right? 125:2 A. Yes. 125:3 Q. Okay. "Per my discussion with 125:4 John, we had some money set aside for IARC." 125:5 What's that mean? 125:6 A. I had a budget line in the 125:7 proposed budget to continue to support ACSH 125:8 in relation to IARC. 125:9 Q. Right. 125:10 So you thought that you should 125:11 go ahead and make that contribution to ACSH, 125:12 right? 125:13 A. That is correct. 125:14 Q. All right. These are the same 125:15 people that helped defend the tobacco 125:16 companies and the same people that helped 125:17 defend the lead companies, right?</p>	DG22.0 GD2018.104
125:20 - 126:12	<p>Goldstein, Daniel 02-27-2018 (00:00:40) 125:20 THE WITNESS: They had taken 125:21 positions in the past on some of those 125:22 issues that I do not fully agree with, 125:23 that is correct. 125:24 QUESTIONS BY MR. MILLER: 125:25 Q. Yes, sir.</p>	GD2018.69

Page/Line	Source	ID
<p>126:1 And let's go to the next page, 126:2 page 9479. This, I believe, is a response 126:3 from ACSH to your -- to you. I want to back 126:4 up and make sure I get it accurate. 126:5 It's an e-mail from Gilbert 126:6 Ross at ACSH, right? 126:7 A. Yes. 126:8 Q. And to you, right, sir? 126:9 A. That is correct. 126:10 Q. Regarding glyphosate and the 126:11 IARC assessment, right? 126:12 A. Yes.</p>		DG22.6.3
128:19 - 129:13	Goldstein, Daniel 02-27-2018 (00:00:58)	DG22.7.1 GD2018.70
<p>128:19 "This situation, however, 128:20 further illustrates why Monsanto's ongoing 128:21 support of ACSH is critical, both for 128:22 Monsanto and ACSH." 128:23 Did I read that correctly? 128:24 A. You did, but you've taken it 128:25 out of the context with the remainder of the 129:1 paragraph where he talks about providing 129:2 information that will help them get further 129:3 up to speed on this topic. 129:4 So, again, this reflects my 129:5 providing them with information that they 129:6 would need to do a scientific assessment on a 129:7 complex issue. 129:8 Q. And in fact, you were able to 129:9 persuade your bosses to provide that ongoing 129:10 support to ACSH and they, in fact, did write 129:11 scientific pieces about the IARC decision of 129:12 glyphosate, right? 129:13 A. That is correct, yes.</p>		GD2018.105
129:14 - 129:16	Goldstein, Daniel 02-27-2018 (00:00:07)	GD2018.105
<p>129:14 Q. One of your key jobs at 129:15 Monsanto was to neutralize the impact of the 129:16 IARC decision, right, Dr. Goldstein? 129:19 THE WITNESS: I don't think 129:20 that's a fair characterization of what</p>		GD2018.71

Page/Line

Source

ID

129:21 I did.

129:22 (Goldstein Exhibit 23 marked

129:23 for identification.)

129:24 QUESTIONS BY MR. MILLER:

DG23.1

129:25 Q. Let's look at the documents.

130:1 We've marked this as

130:2 Exhibit 23, a copy for you, sir, and a copy

130:3 for counsel and an extra copy.

130:4 - 130:8

Goldstein, Daniel 02-27-2018 (00:00:07)

GD2018.100

130:4 All right. Are you ready, sir?

130:5 A. Just give me one more moment

130:6 just to look through the center portion of

130:7 the document.

130:8 Q. Yes, sir.

130:9 - 131:10

Goldstein, Daniel 02-27-2018 (00:00:54)

GD2018.107

130:9 A. Go ahead.

130:10 Q. All right. Thank you, sir.

130:11 Okay. Now we're looking now at

130:12 an e-mail sent from Kelly Clauss, a Monsanto

DG23.1.1

130:13 employee, right?

130:14 A. Yes.

130:15 Q. In February of 2015, right?

130:16 A. Yes.

130:17 Q. Where she copies many Monsanto

130:18 employees, including you, right?

130:19 A. The number of people on here, I

130:20 am included, yes.

130:21 Q. Including Donna Farmer as well,

130:22 I see, right?

130:23 A. Correct.

130:24 Q. Okay. The importance of this

130:25 is high, right?

131:1 A. Yes.

131:2 Q. And it's regarding IARC

131:3 outreach, and attached is an IARC plan,

131:4 right?

131:5 A. That is correct.

131:6 Q. And that plan that's attached

131:7 incorporates feedback from three people,

131:8 including you, Dan Goldstein, right?

Page/Line	Source	ID
131:11 - 131:23	<p>131:9 A. Yes.</p> <p>131:10 Q. Okay. Let's take a look at the</p> <p>Goldstein, Daniel 02-27-2018 (00:00:34)</p> <p>131:11 plan. One thing you say in your plan is that</p> <p>131:12 IARC is a World Health Organization. That's</p> <p>131:13 what it's part of, right?</p> <p>131:14 A. Yes, but let's be clear on who</p> <p>131:15 is saying this. I did not write this plan.</p> <p>131:16 This is -- so you said "you." I did not</p> <p>131:17 write this plan. I commented on it.</p> <p>131:18 Q. Right.</p> <p>131:19 You read it over and</p> <p>131:20 incorporated feedback into the plan, right?</p> <p>131:21 A. Well, someone else incorporated</p> <p>131:22 the feedback, but I did at some point comment</p> <p>131:23 on this, yes.</p>	<p>GD2018.127</p> <p>clear</p>
132:8 - 132:17	<p>Goldstein, Daniel 02-27-2018 (00:00:30)</p> <p>132:8 Q. And going to the</p> <p>132:9 Bates-stamped page 63854. In this plan it</p> <p>132:10 shows that IARC, International Agency for</p> <p>132:11 Research on Cancer, is a World Health</p> <p>132:12 Organization. It's part of it, right?</p> <p>132:13 A. It is part of the WHO, yes.</p> <p>132:14 Q. It says here, "The</p> <p>132:15 International Agency for Research on Cancer,</p> <p>132:16 IARC, is a specialized cancer agency of the</p> <p>132:17 World Health Organization," right?</p>	<p>GD2018.72</p> <p>DG23.3</p> <p>DG23.3.1 - DG23.3.2</p>
133:5 - 133:15	<p>Goldstein, Daniel 02-27-2018 (00:00:28)</p> <p>133:5 Q. In this draft plan it says, "We</p> <p>133:6 should assume and prepare for the outcome of</p> <p>133:7 2B rating, possible human carcinogen; a 2A</p> <p>133:8 rating, probable human carcinogen, is</p> <p>133:9 possible but less likely."</p> <p>133:10 Did I read that correctly?</p> <p>133:11 A. Yes, you did.</p> <p>133:12 Q. And in fact, what you got two</p> <p>133:13 weeks later was a probable human carcinogen</p> <p>133:14 rating, right?</p> <p>133:15 A. That is correct.</p>	<p>GD2018.73</p> <p>DG23.3.3</p>
135:15 - 135:22	<p>Goldstein, Daniel 02-27-2018 (00:00:25)</p>	<p>GD2018.74</p>

Page/Line	Source	ID
	135:15 Q. Yes, sir.	DG23.7 - DG23.7.1
	135:16 Attachment A, which is -- so we	
	135:17 know what -- this is on that same exhibit.	
	135:18 Attachment A, Preparedness and Engagement	
	135:19 Plan For IARC, Carcinogen Rating of	
	135:20 Glyphosate. "Post-IARC, Monsanto is going to	DG23.7.2
	135:21 orchestrate an outcry with the IARC	
	135:22 decision," right?	
136:5 - 136:11	Goldstein, Daniel 02-27-2018 (00:00:13)	GD2018.75
	136:5 THE WITNESS: That is what the	
	136:6 document says. I can't speak to any	
	136:7 of the specifics. This is a planning	
	136:8 document from public affairs, and	
	136:9 although I commented on it, I don't	
	136:10 know specifically what they mean by	
	136:11 this.	
140:14 - 140:14	Goldstein, Daniel 02-27-2018 (00:00:04)	GD2018.76
	140:14 Q. Let's look at Exhibit 24.	
140:15 - 140:16	Goldstein, Daniel 02-27-2018 (00:00:07)	GD2018.109
	140:15 Exhibit 24, an e-mail chain produced by	DG24.1
	140:16 Monsanto.	
140:17 - 141:1	Goldstein, Daniel 02-27-2018 (00:00:22)	GD2018.110
	140:17 All right, sir?	
	140:18 A. Go ahead.	
	140:19 Q. In this e-mail which was sent	
	140:20 to you by John Vicini.	DG24.1.1
	140:21 Who is he?	
	140:22 A. At that time he was my boss.	
	140:23 Q. Okay. This is about a week or	
	140:24 two after the IARC decision, right, March 25,	
	140:25 2015?	
	141:1 A. Yes.	
141:5 - 143:20	Goldstein, Daniel 02-27-2018 (00:02:59)	GD2018.77
	141:5 Q. And it says, "ESH" --	DG24.1.2
	141:6 That's the environmental --	
	141:7 what's the name of it again?	
	141:8 A. Environmental safety and	
	141:9 health.	
	141:10 Q. -- "medical conference outcome.	
	141:11 I spoke with Annemieke" --	

141:12 Am I pronouncing that?

141:13 A. Annemieke.

141:14 Q. Annemieke.

141:15 And who is Annemieke?

141:16 A. Annemieke De Wilde is the head

141:17 of occupational medicine.

141:18 Q. And where is she located?

141:19 A. In St. Louis.

141:20 Q. What's her last name?

141:21 A. De Wilde, D-e, W-i-l-d-e.

141:22 Q. And says, "She is in alignment

DG24.1.3

141:23 that we should not concede a cancer hazard.

141:24 Some of the ESH folks seemed to be inclined

141:25 to go with a message that IARC has identified

142:1 a hazard, but dose is low in the plants and

142:2 thus no significant risk was present."

142:3 John writes on, "I have

DG24.1.4

142:4 emphasized the need to hold firm on the,

142:5 quote, 'no cancer hazard,' end quote,

142:6 position as per the new press release."

142:7 First off, did I read that

142:8 correctly?

142:9 A. Yes, but I believe that that is

142:10 correspondence from me, not from John Vicini.

DG24.1.5

142:11 There's another header in there. It's not as

142:12 obvious as the first one.

142:13 Q. I'm sorry, you're absolutely

142:14 right. I appreciate your clarification.

142:15 All right. So that was from

142:16 you. And let me ask you about that

142:17 paragraph.

142:18 Who are the ESH folks that

142:19 wanted to go with a message that IARC has

142:20 identified a hazard?

142:21 A. I don't remember the specific

142:22 individuals. At the time, we had

142:23 considerable conversation about the need to

142:24 communicate with our employees, and

142:25 communication to employees would fall within

143:1 the scope of our environmental safety and

Page/Line

Source

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143:2 health group. So this is something that I
 143:3 would work in collaboration with them on.
 143:4 And there were two different
 143:5 approaches, and remember that many of these
 143:6 approaches are coming from industrial hygiene
 143:7 people who don't understand or know of the
 143:8 underlying data.
 143:9 So there was a debate as to
 143:10 whether we should acknowledge that Roundup
 143:11 may cause cancer but that a dose response
 143:12 assessment, a risk assessment, was not done
 143:13 by IARC and our doses were low, or that we
 143:14 should remain with what I believe is the
 143:15 correct assessment, which is glyphosate is
 143:16 unlikely to cause cancer, that the IARC
 143:17 classification is incorrect, and that
 143:18 independent of exposure levels, which, by the
 143:19 way, are very low anyway, that there is no
 143:20 risk of cancer to our employees.

clear

143:24 - 144:1

Goldstein, Daniel 02-27-2018 (00:00:13)

GD2018.112

143:24 Q. I want to show you what we've
 143:25 marked as Exhibit 25, a series of e-mails
 144:1 concerning carcinogens in April of 2016.

DG25.1

144:2 - 144:3

Goldstein, Daniel 02-27-2018 (00:00:02)

GD2018.114

144:2 Review it and I have a question
 144:3 or two.

144:4 - 146:25

Goldstein, Daniel 02-27-2018 (00:03:41)

GD2018.113

144:4 A. Yes, go ahead.

144:5 Q. Yes, sir.

144:6 This is an e-mail from you in
 144:7 April of 2016; is that right, sir?

DG25.1.1

144:8 A. Yes.

144:9 Q. All right. Who is Erin
 144:10 Costello?

144:11 A. She is in regulatory affairs,
 144:12 and she's involved in chemical regulation.

144:13 Q. And so this is a little over a
 144:14 year after the IARC ruling -- or decision,
 144:15 and she writes you at the bottom of the page.

144:16 It says, "Dan, St. Louis ESH is rewriting our

DG25.1.2

144:17 chemical safety audit procedure which
144:18 includes reviewing carcinogens."
144:19 My first question to you is:
144:20 What is a chemical safety audit procedure?
144:21 A. So this would be an audit on
144:22 new incoming chemicals for our facilities.
144:23 They're not necessarily products; they could
144:24 chemicals for research, for instance. But
144:25 when someone submits a request to bring a new
145:1 chemical on site, whatever they're doing with
145:2 it, there is a process that is site-specific
145:3 for evaluating that new chemical.
145:4 Q. And that would be conducted by
145:5 the ESH team?
145:6 A. In general, yes, or they can
145:7 ask for assistance if they need it from other
145:8 experts within the company, but generally
145:9 they're able to conduct that themselves.
145:10 Q. You write back to her and you
145:11 state in pertinent part, "I am not sure we
145:12 can necessarily take this position given OSHA
145:13 right-to-know regulations that require that
145:14 we list IARC carcinogenicity on data sheets."
145:15 Did I read that correctly?
145:16 A. That is correct. That is
145:17 written into the regulations in reduction --
145:18 excuse me, in reference to production of
145:19 material safety data sheets.
145:20 So she's asking basically for
145:21 our audit procedure, should we limit that to
145:22 other sources of information.
145:23 And what I'm saying here is,
145:24 given the current federal law requiring that
145:25 we list IARC on our material safety data
146:1 sheet, I don't believe it is advisable to do
146:2 that. We need to be aware of that. We need
146:3 to consider it appropriately.
146:4 And prior to this, we had
146:5 updated our material safety data sheets to
146:6 note the IARC classification but also noting

DG25.1.3

Page/Line

Source

ID

146:7 that we did not believe that classification

146:8 was justified.

146:9 Q. But I want to finish reading

146:10 that paragraph, which I think speaks to that

146:11 point.

DG25.1.4

146:12 Quote, "We are altering our

146:13 current glyphosate SDS" --

146:14 Safety data sheet, right?

146:15 A. Yes.

146:16 Q. -- "if I understand correctly

DG25.1.5

146:17 to state that IARC classifies glyphosate as a

146:18 2A probable human carcinogen, but that we do

146:19 not concur with this assessment," right?

146:20 A. Correct, that's exactly what I

146:21 was saying. In fact, I believe as of this

146:22 timing that had already occurred. I can't

146:23 say it happened simultaneously on every SDS.

146:24 We have a lot of them that need to be

clear

146:25 updated.

151:2 - 156:10

Goldstein, Daniel 02-27-2018 (00:04:19)

GD2018.128

151:2 Q. Good afternoon, Dr. Goldstein.

151:3 As you know, my name is Martin

151:4 Calhoun, and I represent Monsanto Company in

151:5 this case.

151:6 Are you employed at Monsanto?

151:7 A. Yes, I am.

151:8 Q. And what is your current job

151:9 title at Monsanto?

151:10 A. I am a distinguished science

151:11 fellow and lead for medical sciences and

151:12 outreach.

151:13 Q. And what year did you start

151:14 your employment at Monsanto?

151:15 A. 1998.

151:16 Q. And I just want to go briefly

151:17 over your background.

151:18 Where and when were you born,

151:19 Dr. Goldstein?

151:20 A. I was born outside Chicago. I

151:21 was born in Aurora, Illinois, 1955.

151:22 Q. And where did you go to college
151:23 for your undergraduate education?
151:24 A. Undergraduate, University of
151:25 Wisconsin at Madison.
152:1 Q. And did you graduate from the
152:2 University of Wisconsin?
152:3 A. I did. I majored in molecular
152:4 biology in December of '76.
152:5 Q. Did you then go to medical
152:6 school?
152:7 A. I did.
152:8 Q. Where did you go to medical
152:9 school?
152:10 A. Johns Hopkins Medical School in
152:11 Baltimore.
152:12 Q. And did you graduate from
152:13 medical school?
152:14 A. I did.
152:15 Q. And when was that?
152:16 A. That would have been 1981.
152:17 Q. And after graduating from
152:18 medical school, did you do a medical
152:19 residency?
152:20 A. I did. I did a pediatrics
152:21 residency also at Johns Hopkins.
152:22 Q. And after that residency, did
152:23 you pursue studies in toxicology and
152:24 pharmacology?
152:25 A. I did. I did a fellowship at
153:1 University of Toronto at The Hospital for
153:2 Sick Children in Toronto, Canada.
153:3 Q. And was that in both toxicology
153:4 and pharmacology?
153:5 A. Yes, it was two separate
153:6 certifications, but I did both.
153:7 Q. And did you eventually become a
153:8 board certified medical toxicologist?
153:9 A. Yes, I did.
153:10 Q. And can you just tell us in
153:11 simple terms, Dr. Goldstein, what is a

153:12 medical toxicologist?
153:13 A. So a medical toxicologist
153:14 specializes in the diagnosis and treatment of
153:15 poisoning in humans. So it's unlike the
153:16 Ph.D. toxicologists who are oftentimes doing
153:17 rodent studies and risk assessments, the
153:18 focus of clinical toxicology or medical
153:19 toxicology is assessment and treatment of
153:20 patients.
153:21 Q. And after you finished your
153:22 education, did you work as a medical
153:23 toxicologist treating patients?
153:24 A. I did. Yes, I was in Denver
153:25 for about 12 years doing a mixture of
154:1 critical care toxicology in the intensive
154:2 care unit, outpatient toxicology at the
154:3 hospital, as well as an office practice in
154:4 occupational and environmental medicine.
154:5 Q. And have you held various
154:6 titles and held -- had various
154:7 responsibilities while working at Monsanto
154:8 for approximately 20 years?
154:9 A. I've had various titles over
154:10 the years and had responsibility in a wide
154:11 variety of different product areas.
154:12 Q. Now, Dr. Goldstein, do you
154:13 consider yourself a scientist?
154:14 A. I do, yes.
154:15 Q. And have you worked with other
154:16 scientists at Monsanto during the 20 years
154:17 approximately that you've been at Monsanto?
154:18 A. Yes, quite regularly.
154:19 Q. And over the years, have other
154:20 departments and employees at Monsanto looked
154:21 to you for advice and insights about various
154:22 toxicology issues?
154:23 A. Yes.
154:24 Q. And is that how it works at
154:25 Monsanto, that there's cooperation and
155:1 collaboration among employees and

155:2 departments?

155:3 A. We're a very open company, so

155:4 we tend to address issues by networking with

155:5 individuals that may have knowledge or

155:6 resources that are useful.

155:7 Q. And in your experience, what

155:8 has been the role of science at Monsanto over

155:9 the years?

155:10 A. It's fundamentally a

155:11 science-driven company. Product development

155:12 is almost entirely driven by science,

155:13 especially new science. Product safety

155:14 assessment, of course, is also very much a

155:15 scientific process.

155:16 Q. And, Dr. Goldstein, in the

155:17 deposition today we've heard a lot of

155:18 questions and answers about glyphosate and

155:19 glyphosate-based herbicides.

155:20 Have you worked on various

155:21 glyphosate issues, including human health and

155:22 safety, throughout the approximately 20 years

155:23 that you've been at Monsanto?

155:24 A. Yes, I have.

155:25 Q. As part of your

156:1 responsibilities working at Monsanto, have

156:2 you become generally familiar with how

156:3 Monsanto developed and evaluated the safety

156:4 of glyphosate-based herbicides?

156:5 A. Yes, I have.

156:6 Q. And about how long have various

156:7 kinds of Monsanto glyphosate-based herbicides

156:8 been available in this country?

156:9 A. They were first marketed in the

156:10 US, I believe it was, 1974.

156:24 - 158:20

Goldstein, Daniel 02-27-2018 (00:02:01)

GD2018.129

156:24 Q. And please tell the jury in

156:25 simple terms what is typically in most of

157:1 Monsanto's glyphosate-based herbicides.

157:2 A. They're pretty simple

157:3 formulations. They have glyphosate, they

157:4 have water, and they have a surfactant, a
157:5 detergent, in them as well. And then there's
157:6 very small concentrations of some minor
157:7 formulating ingredients in some products.
157:8 Some of them have a little bit of food
157:9 coloring to add a little bit of color to the
157:10 product and products in them to keep them
157:11 from foaming up when you add water.
157:12 Q. And what is a surfactant in
157:13 simple terms, Dr. Goldstein?
157:14 A. So a surfactant is really just
157:15 a soap or detergent. It's a type of molecule
157:16 that allows fat and water to sort of come
157:17 together. And humans use them mostly in the
157:18 household environment for cleaning things,
157:19 for removing greases and oils or for cleaning
157:20 your hands.
157:21 Q. And why would a surfactant be
157:22 in a glyphosate-based herbicide?
157:23 A. So surfactants in herbicides
157:24 mostly are used to help deliver the herbicide
157:25 into the plant because plants have a waxy
158:1 cuticle, a coating, and so if you try and
158:2 apply something, it just sort of beads up on
158:3 the surface. So we add a surfactant that
158:4 then allows the herbicide to be effective in
158:5 a much, much lower concentration.
158:6 Q. So in essence, does the
158:7 surfactant make the herbicide work better?
158:8 A. It does, yes.
158:9 Q. And are surfactants used for
158:10 products other than Monsanto herbicides?
158:11 A. Yes.
158:12 Q. Can you give us a couple of
158:13 examples, please?
158:14 A. So they're generally present in
158:15 herbicides from Monsanto or other sources,
158:16 but they're common in liquid soaps, shampoos,
158:17 conditioners, laundry detergents, dishwashing
158:18 detergents. So they're an exposure that

Page/Line

Source

ID

160:4 - 160:15	158:19 human beings regularly have in the context of 158:20 their daily life.	GD2018.130
	Goldstein, Daniel 02-27-2018 (00:00:23)	
	160:4 Q. Is there a federal government 160:5 agency that evaluates the safety of 160:6 herbicides and decides whether herbicides can 160:7 be sold in the United States?	
	160:8 A. Yes, that would be the 160:9 Environmental Protection Agency, or EPA.	
	160:10 Q. And during your employment at 160:11 Monsanto have you become generally familiar 160:12 with the EPA's regulatory review and 160:13 evaluation of glyphosate and glyphosate-based 160:14 herbicides?	
160:22 - 161:6	160:15 A. Yes, I have.	GD2018.131
	Goldstein, Daniel 02-27-2018 (00:00:20)	
	160:22 Q. And from 1974 to the present 160:23 day has Monsanto had EPA approval to sell 160:24 glyphosate-based herbicides in the United 160:25 States?	
	161:1 A. Yes.	
	161:2 Q. Over the years has the EPA 161:3 considered a large volume of data and 161:4 scientific studies to evaluate the safety of 161:5 glyphosate and glyphosate-based herbicides?	
161:9 - 162:2	161:6 A. Yes.	GD2018.132
	Goldstein, Daniel 02-27-2018 (00:00:51)	
	161:9 THE WITNESS: Yes, they have.	
	161:10 QUESTIONS BY MR. CALHOUN:	
	161:11 Q. Let me rephrase the question.	
	161:12 Can you characterize for us the 161:13 volume of data and scientific studies that 161:14 EPA has considered or has not considered with 161:15 respect to evaluating the safety of 161:16 glyphosate and glyphosate-based herbicides?	
	161:17 A. So EPA has at its disposal not 161:18 only data from Monsanto but data from other 161:19 manufacturers. They get an extensive variety 161:20 of information regarding safety, including 161:21 animal studies of both short-term and	

161:22 long-term toxicity.
 161:23 So they also then follow on an
 161:24 ongoing basis the medical literature, so
 161:25 they're aware of the epidemiology studies and
 162:1 other human information related to glyphosate
 162:2 products.

164:17 - 165:14

Goldstein, Daniel 02-27-2018 (00:00:44)

GD2018.133

164:17 Q. Now, you've testified earlier
 164:18 today about the IARC monograph regarding
 164:19 glyphosate.
 164:20 Do you recall some of those
 164:21 questions?
 164:22 A. Yes.
 164:23 Q. Let's discuss that a little
 164:24 bit, including IARC's assessment that
 164:25 glyphosate is a probable carcinogen.
 165:1 Do you recall evaluating that
 165:2 IARC monograph?
 165:3 A. I do.
 165:4 Q. And what is your evaluation of
 165:5 IARC's glyphosate assessment regarding
 165:6 whether it is based on sound science?
 165:7 A. It's a poor quality assessment.
 165:8 It's based on a limited review of the science
 165:9 relative to regulatory agencies, and I don't
 165:10 believe that the science supports their
 165:11 conclusions.
 165:12 And it's not just me. The same
 165:13 conclusion has been reached by regulatory
 165:14 agencies around the world.

165:17 - 166:18

Goldstein, Daniel 02-27-2018 (00:00:59)

GD2018.134

165:17 QUESTIONS BY MR. CALHOUN:
 165:18 Q. In your assessment, is IARC's
 165:19 glyphosate assessment sound science,
 165:20 Dr. Goldstein?
 165:21 A. No.
 165:22 Q. Can you give us a few examples
 165:23 of why you think IARC's assessment of
 165:24 glyphosate is flawed?
 165:25 A. They look at only a subset of

Page/Line

Source

ID

166:1 the available information. They
 166:2 cherry-picked the data that they wanted to
 166:3 focus on rather than looking at the broader
 166:4 weight of the evidence. They completely
 166:5 failed to take into account any consideration
 166:6 of exposure.

166:7 And so I think overall, just a
 166:8 poorly done and incomplete assessment
 166:9 relative to the regulatory agencies.

166:10 Q. And when you're referring to
 166:11 exposure, are you referring to real world
 166:12 exposures to glyphosate?

166:13 A. Yes. They did not take into
 166:14 account real world exposure data.

166:15 Q. So from a scientific
 166:16 perspective, do you and Monsanto agree with
 166:17 IARC's conclusions about glyphosate?

166:18 A. No, we do not.

173:3 - 173:4

Goldstein, Daniel 02-27-2018 (00:00:06)

GD2018.135

173:3 Q. All right. Let me hand you
 173:4 what I'm marking as Exhibit 27.

173:5 - 173:5

Goldstein, Daniel 02-27-2018 (00:00:02)

GD2018.130

173:5 A. copy for you, Counsel.

173:6 - 176:7

Goldstein, Daniel 02-27-2018 (00:02:43)

GD2018.137

173:6 Now, Dr. Goldstein, I've marked
 173:7 what is Exhibit 27 a study called, quote,
 173:8 "Glyphosate Use and Cancer Incidence in the
 173:9 Agricultural Health Study," end quote.

4100.1.1

173:10 Did I read that correctly?

173:11 A. You did, yes.

173:12 Q. And have you seen this study
 173:13 before?

173:14 A. I have.

173:15 Q. Is this a study that you
 173:16 referred to shortly -- in prior testimony
 173:17 that you referred to it as the Agricultural
 173:18 Health Study?

173:19 A. Yes, it is.

173:20 Q. And if you go to the top

4100.1.2

173:21 right-hand corner of Exhibit 27, do you see

173:22 it states there when this study was first
173:23 published?
173:24 A. Yes.
173:25 Q. And what does that say?
174:1 A. It was first published online
174:2 November 9, 2017, then went to press in 2018.
174:3 Q. And who is the first author on
174:4 this study?
174:5 A. That is the Andreotti
174:6 publication.
174:7 Q. All right. So the first author
174:8 is Gabriella Andreotti; is that right?
174:9 A. That's correct.
174:10 Q. And do you see on the first
174:11 page it says "affiliations of authors"?
174:12 A. Yes.
174:13 Q. Are any of the authors that
174:14 were involved in the study, do any of them
174:15 work at Monsanto?
174:16 A. No.
174:17 Q. Are these authors all at
174:18 various government agencies?
174:19 A. They're either at government
174:20 agencies or they're in academic institutions.
174:21 There's actually a mixture here. Some of
174:22 them have left the program and gone to
174:23 academic institutions but continue to work
174:24 with the Ag Health Study.
174:25 Q. To your knowledge, did Monsanto
175:1 have anything to do with this study that's
175:2 been marked as Exhibit 17 [sic] in terms of
175:3 funding or other support for the study?
175:4 A. No.
175:5 Q. Now, if you go to the
175:6 conclusions in the abstract, I'd like to read
175:7 that into the record and then I'll ask you
175:8 some questions about it.
175:9 Conclusions: Quote, "In this
175:10 large prospective cohort study, no
175:11 association was apparent between glyphosate

4100.1.3

4100.1.4

Page/Line

Source

ID

175:12 and any solid tumors or lymphoid malignancies

175:13 overall, including NHL and its subtypes," end

175:14 quote.

175:15 Did I read that correctly?

175:16 A. You did.

175:17 Q. And what does NHL stand for in

175:18 that sentence?

175:19 A. Non-Hodgkin's lymphoma.

175:20 Q. So what does this tell you,

175:21 Dr. Goldstein, about the issue of whether

175:22 glyphosate or glyphosate-based herbicides

175:23 cause non-Hodgkin's lymphoma?

175:24 A. Well, this is very important

175:25 information because it's human information.

176:1 It relates to formulated products and comes

176:2 from the largest and most comprehensive

176:3 prospective study that's ever been done in

176:4 farmers and applicators and their spouses.

176:5 They found no relationship

176:6 between glyphosate exposure and non-Hodgkin's

176:7 lymphoma in this publication.

179:1 - 180:4

Goldstein, Daniel 02-27-2018 (00:00:55)

GD2018.138

179:1 Q. Now, you were shown various

179:2 abstracts and studies earlier in this

179:3 deposition by plaintiff's counsel.

179:4 Do you recall those series of

179:5 questions generally, Dr. Goldstein?

179:6 A. Yes.

179:7 Q. Now, were any of those studies

179:8 sound science regarding the issue of whether

179:9 glyphosate or glyphosate-based herbicides

179:10 cause cancer?

179:11 A. Taken collectively, no, they're

179:12 not.

179:13 Q. And how about individually,

179:14 were any of them sound science in your view

179:15 and Monsanto's view on the issue of whether

179:16 glyphosate or glyphosate-based herbicides

179:17 cause cancer?

179:18 A. No.

Page/Line

Source

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179:19 Q. Now, has the EPA been aware of
179:20 the various studies that plaintiff's counsel
179:21 showed you earlier today in this deposition?
179:22 A. Yes, definitely.
179:23 Q. And did any of those studies
179:24 change the EPA's conclusion that glyphosate
179:25 is not likely to be carcinogenic to humans?
180:1 A. Evidently not. I mean, the
180:2 most recent information we have suggests that
180:3 they're standing firmly behind that
180:4 conclusion.

Total Time = 01:01:19

Documents Shown

4106
DG10
DG11
DG12
DG13
DG14
DG15
DG16
DG17
DG18
DG19
DG20
DG22
DG23
DG24
DG25
DG5
DG7