



Originally prepared as a confidential briefing for Governing Council Members on IARC evaluation of glyphosate and requests for meetings from CropLife

1. An IARC Working Group (WG) of 17 international experts evaluated glyphosate in March 2015 as Group 2A, “probably carcinogenic to humans”; IARC scientists are not part of the WG¹. Monsanto and the European Crop Protection Association provided scientific Observers to the meeting¹, who had access to the scientific deliberations and all meeting documents.
2. Monsanto rejected and attacked the IARC findings, calling it “junk science”², and immediately requested that WHO retract the IARC evaluation³ and privately lobbied the US EPA to reject IARC’s findings⁴. Monsanto convened their own expert panel (including many past consultants to Monsanto) through Intertek Scientific & Regulatory Consultancy to review the IARC Monograph on glyphosate, finding no evidence of carcinogenicity, and published the results in a sponsored issue of a scientific journal⁵.
3. Coordinated criticisms of IARC by the industry and umbrella organizations such as CropLife and the American Chemistry Council have continued in two broad areas: a) scientific credibility of the programme in general and the evaluation of glyphosate in particular and b) on the continued funding to IARC from US Government sources⁶.
4. On the first point, IARC has been the subject of much misleading reporting. Examples include accusations of:
 - a. Cherry-picking data – for transparency, IARC’s procedures⁷ call for systematic evaluation of scientific data in the public domain, but not unpublished studies or industry reports. Of interest, the European Medicines Agency has recently implemented such a procedure and European Food Standards Agency has promised to do so in the future.
 - b. Activist scientists with political agenda – false and defamatory statements have been made concerning IARC scientists; for transparency and public scrutiny IARC disclosed conflicting interests of all participants, including the Secretariat, two months before the meeting; an additional and independent assessment of any potential conflicts of interest was conducted for The Lancet Oncology publication¹.
 - c. Creating needless concerns – IARC’s hazard identification has been portrayed as insufficient and the methodology as outdated, in many blogs, news media and articles, including from industry organisations and paid consultants of Monsanto⁵. IARC methodology is published⁷ and constantly evolves to include the latest science; hazard identification is a key foundation for national authorities to make risk assessments; the IARC Monographs do not make any direct public health recommendations, such as limit values.
 - d. The data evaluated do not represent “real world” exposures – this ignores the fact that cancer epidemiology, based on real world exposures associated with cancer risks in humans, is one cornerstone of the IARC Monograph evaluations.

5. IARC Working Group (WG) members and their employers⁸ based in the US have been subject to wide-reaching subpoenas by Monsanto lawyers asking for all draft documents, emails⁹, and other communications on IARC and glyphosate and the WG; these requests are made in the context of US court cases on lymphoma and glyphosate use; arguments from IARC on deliberative documents have been misrepresented as lack of transparency.¹⁰
6. Other members of the WG and IARC Secretariat are also now are being subject to intimidating¹¹ letters from Monsanto lawyers³; WHO and IARC considers the underlying principle of confidentiality of deliberative documents to be fundamental to an open and productive process of scientific deliberation, and that these would be protected from disclosure under UN privileges and immunities.
7. On the second point of IARC funding,
 - a. There has been lobbying of US House of Representatives Committees suggesting that the NIH funding for IARC should be stopped⁴. NIH/NCI USA have been called before the Committees to testify.
 - b. IARC anticipated that the next step for the industry would be to work through the governing body of the Agency: The Netherlands, Australia and Canada have already been approached by CropLife International.
8. CropLife have taken a number of specific actions in relation to the glyphosate evaluation:
 - a. lobbied WHO about the Volume 112 and Volume 113 IARC evaluations³;
 - b. misrepresented the Agency in letter to US EPA¹² accusing the Agency of only using partial data and falsely accusing one of our scientists of having a biased view;
 - c. lobbied US EPA about the composition of the expert panel that will consider glyphosate carcinogenicity in Dec 2016.¹²

¹ <http://www.thelancet.com/journals/lanonc/article/PIIS1470-2045%2815%2970134-8/fulltext>;
<http://monographs.iarc.fr/ENG/Meetings/vol112-participants.pdf>

² <http://news.monsanto.com/press-release/research-and-development/monsanto-reinforces-decades-dataand-regulatory-review-clear/>; <http://www.wsj.com/articles/monsanto-bites-back-at-glyphosate-findings-1427147273>

³ see <http://governance.iarc.fr/ENG/infocouncils.php>

⁴ Multiple records were released through a FOIA request to the US EPA:
<https://foiaonline.regulations.gov/foia/action/public/view/request?objectId=090004d280904eba> (see releasable Monsanto Summary Comments on IARC Lancet Oncology article as one example.)

⁵ <http://www.tandfonline.com/toc/itxc20/46/sup1?nav=tocList>; see also <https://www.ncbi.nlm.nih.gov/pubmed/27780763>, <https://www.ncbi.nlm.nih.gov/pubmed/27552246>, <https://www.ncbi.nlm.nih.gov/pubmed/7552246>; note that interests are not always disclosed (in early critiques of the IARC evaluation Sir Colin Berry was a vocal critic (e.g. via Science Media Centre) but omitted to declare he had worked as a consultant for Monsanto, whereas <https://www.ncbi.nlm.nih.gov/pubmed/27677669> states "Gary Williams, Sir Colin Berry, João Lauro Viana de Camargo, and Helmut Greim have previously served as independent consultants for the Monsanto Company, some on the European Glyphosate Task Force.")

⁶ The US House Committee on Oversight and Government Reform Chairperson Jason Chaffetz in a Sept. 26 letter to NIH director Francis Collins, Oversight Committee Chairman <https://oversight.house.gov/wp-content/uploads/2016/09/2016-09-26-JEC-to-Collins-NIH-IARC-Funding-due-10-10.pdf> describes IARC as having "a record of controversy, retractions, and inconsistencies" and asks why the NIH, which has a \$33 billion annual budget, continues to fund it; IARC Director wrote to NIH Director correcting some of the

misrepresentations of the Agency in the letter from Congressman Chaffetz (<http://monographs.iarc.fr/ENG/News/LetterFromDrWild-to-DrCollins.pdf>). The American Chemistry Council issued a statement following Chaffetz's letter accusing IARC of "a long history of passing judgment on substances through a fundamentally-flawed process that yields questionable results". The CEO wrote to Mr Chaffetz along the same lines <https://www.americanchemistry.com/ACC-Letter-to-House-Committee-on-IARC-Monographs.pdf>; Robert Aderholt, chairman of the U.S. congressional Appropriations Subcommittee on Agriculture, wrote in June to NIH director Collins questioning funding of IARC (<http://src.bna.com/fLL>)⁷ <http://monographs.iarc.fr/ENG/Preamble/currenta4data0706.php>

⁸ search "IARC" at <https://www.nih.gov/sites/default/files/institutes/foia/foia-log-sep2016.pdf>;

⁹ some emails released under subpoena to Monsanto are apparently given to journalists (e.g., <http://reut.rs/2elowTw>; <https://morningconsult.com/wp-content/uploads/2016/10/MattRossEmail.pdf>) and US House of Representatives (https://science.house.gov/sites/republicans.science.house.gov/files/documents/201610251122a_Redacted%20n%281.5%29.pdf)

¹⁰ http://www.iarc.fr/en/media-centre/iarcnews/pdf/Reuters_Readmore_Oct2016.pdf;
https://www.iarc.fr/en/media-centre/iarcnews/pdf/Reuters_questions_and_answers_Oct2016.pdf

¹¹ <http://thehill.com/blogs/pundits-blog/healthcare/303597-bully-monsanto-attacks-scientists-who-link-glyphosate-and>

¹² see <https://www.regulations.gov/document?D=EPA-HQ-OPP-2016-0385-0005>;
<https://www.regulations.gov/document?D=EPA-HQ-OPP-2016-0385-0356>;
<http://191hmt1pr08amfq62276etw2.wpengine.netdna-cdn.com/wp-content/uploads/2016/01/CLA-Comments-on-SAP-Disqualification-10-12-16.pdf>