

October 31, 2016

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VIA U.S. MAIL AND ELECTRONIC MAIL

Dr. Kathryn Guyton International Agency for Research on Cancer 150 Cours Albert Thomas 69372 Lyon CEDEX 08, France

Dear Dr. Guyton:

We are writing to you because we have reason to believe that as a staff member on the International Agency for Research on Cancer's ("IARC's") monograph program, you have access to and control of files maintained on two computer systems IARC has funded, created, or used to create the monographs. The two systems are the Health Assessment Workspace Collaborative ("HAWC") and the IARC Online Publications System ("IOPS"), which were used in connection with the preparation of the IARC's Monograph Volume 112. HAWC is the system that IARC and/or IARC working group members use to upload, comment on, or prepare drafts of the monographs; synthesize data; and tag or group publications into different categories to facilitate the drafting of the monographs. IOPS is the system that IARC and/or IARC working group members use to set or review assignments for the monographs; upload, comment on, or prepare drafts of the monographs; create tables to use in the monographs; and provide instructions to authors.

IARC has proclaimed that the procedures for its review of glyphosate were and are "transparent." In the interest of transparency, we ask that you voluntarily make available to us—and to any other interested party—the files that are or were hosted on HAWC and/or IOPS as set forth in the list below, in native electronic format. We will work with you to facilitate this process in the least disruptive manner possible to you.

If you decline to provide the files, we request and instruct IARC immediately to take all reasonable steps in IARC's power to preserve all such files intact pending formal discovery requests issued via a U.S. court. In particular, we request and instruct IARC not to delete any such files or to move them off of the system where they are currently stored, and to take steps to ensure that nobody else does so.

Sincerely,

Kirby T. Griffis Counsel for Monsanto Company

Files requested

File refers to any electronic document or record of any sort, including but not limited to word processing files, spreadsheet files, sql or other database files, e-mail, and log files tracking modifications or user access. It specifically includes all drafts and versions of any file and all metadata associated with any file.

IARC 112 refers both to the IARC monograph entitled "Some Organophosphate Insecticides and Herbicides: Diazinon, Glyphosate, Malathion, Parathion, and Tetrachlorvinphos" and to the entire process of its preparation before, during, and after the March 3-10, 2015 IARC working group meeting in Lyon, France.

Participants in IARC 112 refers to all persons invited to participate in the preparation of the monograph by IARC (see Attachment 1), as well as anyone else who created or altered any of the files set forth below.

- 7. All files on HAWC and/or IOPS created by, tagged by, modified by, or made available to any or all participants in IARC 112.
- 8. All files on HAWC and/or IOPS relating to the tagging of studies or other articles for consideration by any or all participants in IARC 112.
- 9. All files downloaded from or uploaded to HAWC and/or IOPS by any participant in IARC 112.
- 10. All files on HAWC and/or IOPS relating to any reviews, re-analyses, or statistical calculations with regard to IARC 112 or any subset of the data, studies, and other materials considered in IARC 112.
- 11. All database, log, or other files on HAWC and/or IOPS which contain information about user access to and changes in the files hosted on HAWC and/or IOPS, including but not limited to who accessed which files, when, whether changes were made, what changes were made, and when and whether files were deleted.
- 12. All files on HAWC and/or IOPS reflecting comments or communications between participants in IARC 112.

Attachment 1

IARC Monographs on the Evaluation of Carcinogenic Risks to Humans VOLUME 112: SOME ORGANOPHOSPHATE INSECTICIDES AND HERBICIDES: DIAZINON, GLYPHOSATE, MALATHION, PARATHION, AND TETRACHLORVINPHOS Lyon, France: 3-10 March 2015

LIST OF PARTICIPANTS

Working Group Members and Invited Specialists served in their individual capacities as scientists and not as representatives of their government or any organization with which they are affiliated. Affiliations are provided for identification purposes only.

Members

Isabelle Baldi, University of Bordeaux, France

Aaron Blair, National Cancer Institute, USA [retired] (Overall Chair)

Gloria M. Calaf, Tarapaca University, Chile

Peter P. Egeghy, U.S. Environmental Protection Agency, USA¹ (Unable to attend)

Francesco Forastiere, Regional Health Service of the Lazio Region, Italy (Subgroup Chair, Cancer in Humans)

Lin Fritschi, Curtin University, Australia (Subgroup Chair, Exposure)

Gloria D. Jahnke, National Institute of the Environmental Health Sciences, USA

Charles W. Jameson, CWJ Consulting, LLC, USA (Subgroup Chair, Cancer in Experimental Animals)

Hans Kromhout, Utrecht University, The Netherlands

Frank Le Curieux, European Chemicals Agency, Finland

Matthew T. Martin, U.S. Environmental Protection Agency, USA

John McLaughlin, University of Toronto, Canada

Teresa Rodriguez, National Autonomous University of Nicaragua, Nicaragua (Unable to attend)

Matthew K. Ross, Mississippi State University, USA

Ivan I. Rusyn, Texas A&M University, USA (Subgroup Chair, Mechanisms)

Consolato Maria Sergi, University of Alberta, Canada

Andrea 't Mannetje, Massey University, New Zealand

Lauren Zeise, California Environmental Protection Agency, USA

Invited Specialists

Christopher J. Portier, Agency for Toxic Substances and Disease Registry, USA [retired]²

¹ Peter P Egeghy received "in kind" support and reimbursement of travel expenses of on average less than US \$2.000 per year during the last 4 years from participation in meetings sponsored by the American Chemistry Council, an industry trade association for American chemical companies, and the Health and Environmental Sciences Institue (HESI), a nonprofit scientific research organization based in Washington and funded by corporate sponsors.

² Christopher J Portier receives a part-time salary from the Environmental Defense Fund, a United Statesbased nonprofit environmental advocacy group.

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Representatives of national and international health agencies

Amira Ben Amara, National Agency for Sanitary and Environmental Product Control, Tunisia (Unable to attend)

Catherine Eiden, U.S. Environmental Protection Agency, USA (Unable to attend)

Marie-Estelle Gouze, for the French Agency for Food, Environment and Occupational Health and Safety, France

Jesudosh Rowland, U.S. Environmental Protection Agency, USA

Observers

Mette Kirstine Boye Jensen, for Cheminova A/S, Denmark³
Béatrice Fervers, for the Léon Bérard Centre, France
Elodie Giroux, University Jean-Moulin Lyon 3, France
Thomas Sorahan, for Monsanto Company, USA⁴
Christian Strupp, for the European Crop Protection Association, Belgium⁵
Patrice Sutton, for the University of California, San Francisco, Program on Reproductive Health and the Environment, USA⁶

IARC secretariat

Lamia Benbrahim-Tallaa, Section of *IARC Monographs*Rafael Carel, Visiting Scientist, University of Haifa, Israel, Section of *IARC Monographs*Fatiha El Ghissassi, Section of *IARC Monographs*Sonia El-Zaemey, Section of the Environment and Radiation
Yann Grosse, Section of *IARC Monographs*Neela Guha, Section of *IARC Monographs*Kathryn Guyton, Section of *IARC Monographs* (*Responsible Officer*)
Charlotte Le Cornet, Section of the Environment and Radiation
Maria Leon Roux, Section of the Environment and Radiation

³ Mette Kristine Boye Kristensen is employed by Cheminova A/S, Denmark, a global company developing, producing and marketing crop protection products.

⁴ Tom Sorahan is a member of the European Glyphosphate Toxicology Advisory Panel, and received reimbursement of travel cost from Monsanto to attend EuroTox 2012.

⁵ Christian Strupp is employed by ADAMA Agricultural Solutions Ltd, Israel, a producer of Diazinone and Glyphosphate.

⁶ Patrice Sutton's attendance of this Monographs meeting is supported by the Clarence E. Heller Charitable Foundation, a philanthropic charity with a mission to protect and improve the quality of life through support of programs in the environment, human health, education and the arts.

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Dana Loomis, Section of *IARC Monographs*Heidi Mattock, Section of *IARC Monographs (Editor)*Chiara Scoccianti, Section of *IARC Monographs*Andy Shapiro, Visiting Scientist, Section of *IARC Monographs*Kurt Straif, Section of *IARC Monographs (Section Head)*Jiri Zavadil, Section of Mechanisms of Carcinogenesis

NOTE REGARDING CONFLICTS OF INTERESTS: Each participant submitted WHO's Declaration of Interests, which covers employment and consulting activities, individual and institutional research support, and other financial interests. Participants identified as Invited Specialists did not serve as meeting chair or subgroup chair, draft text that pertains to the description or interpretation of cancer data, or participate in the evaluations. The Declarations were updated and reviewed again at the opening of the meeting.

NOTE REGARDING OBSERVERS: Each Observer agreed to respect the Guidelines for Observers at *IARC Monographs* meetings. Observers did not serve as meeting chair or subgroup chair, draft any part of a *Monograph*, or participate in the evaluations. They also agreed not to contact participants before the meeting, not to lobby them at any time, not to send them written materials, and not to offer them meals or other favours. IARC asked and reminded Working Group Members to report any contact or attempt to influence that they may have encountered, either before or during the meeting.

Posted on 26 January 2015, updated 19 October 2016