

International Agency for Research on Cancer



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The Honourable Lamar Smith
Chairman
Committee on Science, Space, and Technology
and
The Honourable Andy Biggs
Chairman
Subcommittee on Environment

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CPW/mg

20 November 2017

Dear Congressmen Smith and Biggs,

I refer to your letter dated 1 November 2017. I am pleased to provide a written response to the issues you raise about the Monographs programme of the International Agency for Research on Cancer (IARC). In replying, I note that this information is given without prejudice and does not constitute a waiver of the immunities and inviolability of archives enjoyed by the World Health Organization (WHO) and IARC.

The IARC Monographs are consensus evaluations developed by Working Groups of independent experts, free from vested interests. As IARC explained to the reporter cited in your letter, changes made to draft documents are the result of deliberation between Working Group members and for this reason are not attributable to any particular scientist. For all Monograph evaluations, drafts prepared over the months prior to a meeting form the basis of open and detailed scientific debate during the eight-day meeting in Lyon and are modified by the Working Group as a result. The final Monograph evaluation represents the scientific consensus of the whole Working Group and does not have individually authored sections. IARC staff (secretariat to the meeting) do not draft or revise the Monograph text, which is the preserve of Working Group members.

During the Monograph meeting in March 2015 at which glyphosate was evaluated, Dr Christopher Portier was an Invited Specialist. Invited Specialists do not serve as meeting chair or subgroup chair, nor do they draft text that pertains to the description or interpretation of cancer data, or participate in the evaluations. In April 2014, when Dr Portier chaired the Advisory Group to Recommend Priorities for IARC Monographs 2015-2019, he did not have any contractual relationships with litigation lawyers relating to glyphosate nor any other declared activities that could be considered as creating a real or perceived conflict of interest. The Advisory Group

comprised 21 members from 13 countries and their recommendations were published in *The Lancet Oncology*¹ and on the IARC website².

In the interests of transparency, the IARC Monographs are based on independent scientific review of published research and not on the basis of unpublished or “secret data” unavailable publicly. According to this principle and as required by its [Preamble](#)³, the [IARC Monograph on glyphosate](#)⁴ did not include any unpublished information on the Agricultural Health Study (AHS). Therefore, it is false to assert that Dr Blair was in a position to withhold critical information from IARC, about the AHS or any other unpublished study, for that matter. The Working Group did consider the published report from the AHS.

This same principle of independent scientific review and verification explains differences between a draft document and the published Monograph text referred to by Ms Kelland. Most of these differences specifically relate to a review article⁵ co-authored by a Monsanto scientist and which has been the subject of investigative reporting concerning “ghost-writing”⁶. The draft Monograph document seen by Ms Kelland reported the conclusions of the authors of this review article. During the Monographs consensus meeting, the Working Group considered that information in the review article and its supplement was insufficient for independent evaluation of the individual studies and the conclusions reached by the Monsanto scientist and other authors. As a result, the draft was revised, and the text in the published [Monograph](#) is the consensus opinion of the Working Group. Nevertheless, the Monograph factually describes the review article and the reported findings (see pages 34–35 and 40–41).

Draft and deliberative materials are not made public, in order to protect the Working Group scientists from interference by vested interests. The position of IARC and the WHO concerning the public release of deliberative documents, or records of deliberative scientific discussions, is consistent with standard practice in scientific committees. Individual Working Group members contacted IARC to express concerns when being pressed to respond to allegations about the scientific debate that took place during the Monograph meeting. In this light, IARC issued a reminder to all parties not to pressure or intimidate scientists in relation to their role as Working Group members⁷.

Draft documents are available, however, to all scientists attending the Monograph meetings, including Observers from industry. IARC was pleased to welcome various scientific Observers to the glyphosate Monograph meeting, including from Monsanto. The Monsanto Observer was quoted in the media as saying: “The meeting was held in accordance with IARC procedures. Dr Kurt Straif, the director of the Monographs, has an intimate knowledge of the rules in force and insisted that they be respected.”⁸

¹ Straif K *et al.* (2014). Future priorities for the IARC Monographs. *Lancet Oncol*, 15, 683-684.
<http://www.thelancet.com/journals/lanonc/article/PIIS1470-2045%2814%2970168-8/fulltext>

² IARC (2014). Report of the Advisory Group to Recommend Priorities for IARC Monographs during 2015–2019.
<http://monographs.iarc.fr/ENG/Publications/internrep/14-002.pdf>

³ IARC (2006). Preamble to the IARC Monographs. <http://monographs.iarc.fr/ENG/Preamble/index.php>.

⁴ IARC Working Group on the Evaluation of Carcinogenic Risk to Humans (2017). Some Organophosphate Insecticides and Herbicides. <http://monographs.iarc.fr/ENG/Monographs/vol112/index.php>

⁵ Greim H *et al.* (2015). Evaluation of carcinogenic potential of the herbicide glyphosate, drawing on tumor incidence data from fourteen chronic/carcinogenicity rodent studies. *Crit Rev Toxicol*, 45, 185–208. PMID:25716480

⁶ http://abonnes.lemonde.fr/planete/article/2017/10/04/monsanto-papiers-desinformation-organisee-autour-du-glyphosate_5195771_3244.html; http://www.europarl.europa.eu/cmsdata/129120/PH%20Glyphosate_Gillam.pdf; <https://www.bloomberg.com/news/articles/2017-08-09/monsanto-was-its-own-ghostwriter-for-some-safety-reviews>

⁷ http://www.iarc.fr/en/media-centre/iarcnews/2016/glyphosate_IARC2016.php

⁸ http://abonnes.lemonde.fr/planete/article/2017/10/18/glyphosate-monsanto-tente-une-derniere-man-uvre-pour-sauver-le-roundup_5202606_3244.html

In summary, the cancer hazard classifications made by the IARC Monographs are the result of scientific deliberations of Working Groups of independent scientists, free from conflicts of interest. The resulting Monograph represents the Working Group's consensus conclusions, based on their critical review of the published scientific literature, agreed upon by all Working Group members in plenary sessions. The principles, procedures and scientific criteria that guide the evaluations are described in the Preamble to the IARC Monographs.

Although IARC is not in a position to provide witnesses for any potential hearing, I welcome this opportunity to respond to your various points and in so doing to correct repeated misrepresentations of the Monographs promoted by some sections of the media over an extended period of time. You would also both be welcome to visit the Agency and to pose your questions directly to me and my staff.

The Agency remains committed to its work to reduce the ever growing burden of cancer worldwide.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'CP Wild', with a horizontal line underneath.

Christopher P. Wild, PhD
Director