

October 31, 2016

**VIA US MAIL AND ELECTRONIC MAIL**

Dr. Consolato Maria Sergi  
University of Alberta  
8440 112 St. N.W.  
Edmonton, Alberta Canada T6G 2R7

Kirby T. Griffis  
dir 202 898 5828  
kgriffis@hollingsworthllp.com

Dear Dr. Sergi:

We are writing to you because we have reason to believe that you have access to and control of files maintained on two computer systems called the Health Assessment Workspace Collaborative (“HAWC”) and the International Agency for Research on Cancer (“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. We believe you have access to HAWC and IOPS because of your involvement working on Monograph Volume 112.

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 you immediately to take all reasonable steps in your power to preserve all such files intact pending formal discovery requests issued via a U.S. Court. In particular, we request and instruct you 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.

1. All files on HAWC and/or IOPS created by, tagged by, modified by, or made available to any or all participants in IARC 112.
2. 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.
3. All files downloaded from or uploaded to HAWC and/or IOPS by any participant in IARC 112.
4. 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.
5. 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.
6. 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, USA<sup>1</sup> (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]<sup>2</sup>

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<sup>1</sup> 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 Institute (HESI), a nonprofit scientific research organization based in Washington and funded by corporate sponsors.

<sup>2</sup> Christopher J Portier receives a part-time salary from the Environmental Defense Fund, a United States-based 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  
Jesusdosh Rowland, U.S. Environmental Protection Agency, USA

**Observers**

Mette Kirstine Boye Jensen, for Cheminova A/S, Denmark<sup>3</sup>  
Béatrice Fervers, for the Léon Bérard Centre, France  
Elodie Giroux, University Jean-Moulin Lyon 3, France  
Thomas Sorahan, for Monsanto Company, USA<sup>4</sup>  
Christian Strupp, for the European Crop Protection Association, Belgium<sup>5</sup>  
Patrice Sutton, for the University of California, San Francisco, Program on Reproductive  
Health and the Environment, USA<sup>6</sup>

**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

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

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

<sup>5</sup> Christian Strupp is employed by ADAMA Agricultural Solutions Ltd, Israel, a producer of Diazinone and Glyphosate.

<sup>6</sup> 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