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Dear Dr. Rice;

I enjoyed our recent meeting in Washington, DC, (March 1) and am hopeful that our discussions will lead IARC towards compliance with the WHO/IARC Declaration of Interests (DOI) policy. Clearly, IARC's current practice of collecting the DOI forms, but allowing all financially conflicted persons to remain as voting, fully participating members of the Working Group (WG) cannot be considered compliance. Further, to allow scientists who have a financial interest in the decision outcome to prepare the discussion documents, or, worse, to chair the discussion groups pertaining to the chemical is simply unacceptable. I realize that the model that we are proposing, and which is in practice for meetings of the US National Academy of Sciences, the US Environmental Protection Agency, and the US National Cancer Institute, would be a radical departure from the meeting format that IARC currently uses. However, I reiterate, such a change is long overdue.

As we made clear in our meeting with you, NRDC supports a meeting format where only the voting members of IARC WG, who are chosen for their scientific integrity and credibility, be allowed to sit at the table and participate openly in the discussion in both the plenary and subgroup sessions. All observers (non-voting) should sit in a separate section of the room, but be invited to speak to the WG at a public microphone, at specified times. These public comment periods might be both before and after discussion topics, so that information may be considered by the WG during their discussions. Observers could distribute handouts, if desired, but could not join in the WG discussion freely. No people with financial conflicts should be allowed to participate as WG members. The argument that science is an unbiased pursuit of the truth is romantic, but outdated. The argument that it is necessary to include financially conflicted scientists on an IARC expert panel is simply untrue.

We are also concerned that the selection criteria for observers is skewed towards favoring industry representatives with financial conflicts of interest over non-financially conflicted observers. The US Occupational Safety and Health Administration (OSHA) requested that staff scientists be allowed to attend the WG meetings on butadiene and methylene chloride, as observers. These staff members had prepared the risk assessments on these chemicals for OSHA, and clearly had some in-depth knowledge of the chemical risks that would likely have been of

benefit to the WG. It would certainly have been of benefit to OSHA to have observers at the IARC meetings. However, IARC denied OSHA staff observer status. If IARC persists in its present format of allowing observers to attend by invitation only, then an attempt by IARC to balance the financial conflicts and biases of the observers is desperately needed. Clearly, most if not all of the observers are representatives of industry and are allowed to participate freely in all discussions, as is the current IARC format, then the meetings are dominated by industry perspective. Industry perspective has not historically represented the interests of public health, worker safety, or environmental protection.

Although I requested copies of the declarations by participants in the monographs for which there have been "apparent" conflicts of interest, these were not provided at our meeting. I again make that request. Specifically, I request the declarations for all participants of the WG in the deliberations for diethyl (hexyl) phthalate (DEHP), butadiene, saccharin, atrazine, amitrole, ethylene thiourea, methyl t-butyl ether (MTBE), glass wool, and styrene. Based on WHO's DOI policy, all industry consultants/employees who were allowed to take part in each meeting should have been asked to not take part in the portion of the discussion or work affecting that interest or, if they were allowed by IARC to participate, then their DOI forms should be made available to the public. The DOI policy does not condone the practice of industry consultants preparing the monograph background documents, as was done for styrene (Feb. 2002). Because the objectivity of several IARC monographs has been questioned, these materials should have been provided. The DOI policy states that, "to assure the technical integrity and impartiality of WHO's work, it is necessary to avoid situations in which financial or other interests might affect the outcome of that work." NRDC cautions IARC, as I did in our meeting together, that the integrity and impartiality of IARC is indeed being questioned; only a frank acknowledgement of the problem, and a rapid move towards a meeting format that fosters open scientific discourse, free of financial conflict, can repair IARC's damaged credibility.

We have been informed that Michael Bird of Exxon-Mobil, had recently been posted at IARC in a status described as "sabbatical" and listed in the Monographs as a "visiting scientist" among the IARC secretariat. No mention of his employment with Exxon is made. This is reminiscent of the controversial, temporary placement of pharmaceutical industry officials in other World Health Organization agencies. Corporate representatives thus placed could have input and access to critically important, unpublished information regarding IARC activities, such as the selection of chemicals for review, and selection of members for the WGs. Will you please inform us as to what other corporate officials have been stationed in this manner at IARC in the past 10 years, for what periods of time, and at whose expense. We would like to know if any corporate employees and consultants are presently at IARC, and if there are currently plans to bring in any such persons in the coming months.

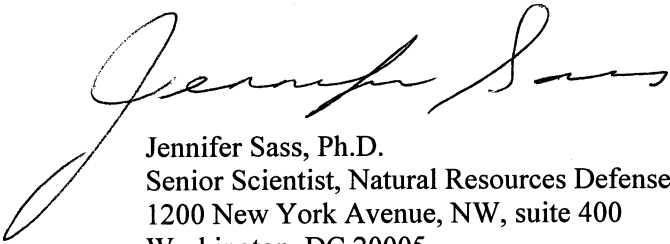
The Natural Resources Defense Council is an environmental non-profit organization in the US, with the support of more than 500,000 members nationwide. The Public Health Program at NRDC uses the IARC monographs on a regular basis, to inform our decisions regarding chemicals that are the subject of government policy decisions. The IARC classification of a chemical, along with the review and commentary on the database, is of great importance in shaping our confidence in the available data, and in policy decisions. In addition, the prologue at the beginning of the Monographs has helped to shape our approach to chemical evaluations. Overall, IARC discussions and decisions have been incorporated into our comments to the US Environmental Protection Agency (EPA) on various chemical policy decisions, and on EPA guidance documents. For all these reasons and more, it is of great importance that IARC complies with the WHO/IARC disclosure of interest policy, and that public interest organizations such as NRDC and governmental agencies world-wide be able to have confidence that the

Monographs represent the truly objective state-of-the-science, untainted by the influence of financially interested parties.

Thank you for your generous offer to provide NRDC with complimentary copies of the Monographs. I am happy to accept your offer. Please place me on the free distribution list for future Monographs, and provide me with past volumes that are available. The Monographs will be freely available to all NRDC staff, and I can assure you that they will be used and appreciated.

I look forward to receiving the Monographs and to continuing our discussions. I hope that our concerns will be considered carefully by the IARC senior staff and acted upon.

Sincerely,



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