

CAL DOOLEY  
PRESIDENT AND CEO



October 18, 2016

The Honorable Jason Chaffetz  
Chairman, Committee on Oversight and Government Reform  
United States House of Representatives  
Washington, DC 20515

Dear Chairman Chaffetz:

The American Chemistry Council and its members welcome your interest in learning more about the relationship between the National Institute of Health (NIH) and the International Agency for Research on Cancer (IARC). While IARC's mission and programs such as its Cancer Registry, screening programs in the developing world, and cancer research are laudable, ACC has serious concerns about the lack of transparency, rigor and relevance of IARC's Monograph Program. Therefore, we believe IARC warrants greater public scrutiny, particularly as the recipient of significant United States government funding.

As you know, IARC assesses the hazard of a particular substance or behavior, meaning that IARC evaluates whether a substance could cause cancer in humans under any circumstances, including at exposure levels far beyond what is typical. Hazard information alone is not meaningful and is often misleading unless it is considered along with real-world exposure data to determine the actual risk that a substance or behavior will cause harm. Unfortunately, the distinction between hazard and risk is often not understood or disregarded. Thus, IARC findings frequently lead to alarming headlines; unnecessary public concern with potential adverse consequences in areas including health, safety and nutrition; and even regulatory action in the case of California's Proposition 65 listing and warning program.

Beyond this fundamental flaw, there are a host of problems associated with the processes and practices of IARC's Monographs program that undermine the credibility of the agency's conclusions:

- Monographs do not consider the full weight of the scientific evidence and frequently conclusions are based on studies of poor quality.



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- IARC reviews lack transparency and disregard conflicts and potential sources of bias among researchers. Some Working Group participants have a personal or professional stake in the outcome of the Monograph. At the same time, IARC prohibits the participation of industry representatives and other stakeholders and will not consider their input, citing purported conflicts.
- IARC's practice of releasing a Working Group's conclusions by press release months before publication of explanatory and supporting information contained in the complete Monograph breeds the kind of media frenzy and widespread misinterpretation that accompanied recent announcements related to red meat, processed meat, glyphosate, and very hot beverages.

In light of the obvious need for substantial reforms in the Monographs program, it is particularly troubling that the U.S. government provides millions of taxpayer dollars to IARC each year without requiring the kind of transparency and accountability Americans expect of public institutions.

Thank you for your interest in shedding light on the relationship between IARC and NIH. We would be pleased to discuss our concerns regarding the IARC Monographs program further with you or to be helpful in any way as you ensure that America's taxpayer dollars are being spent in a way that will provide relevant, meaningful and credible public health information.

Sincerely,



Cal Dooley

