



NATURAL RESOURCES DEFENSE COUNCIL
THE EARTH'S BEST DEFENSE

February 16, 2011

This letter is written on behalf of the Natural Resources Defense Council (NRDC), a US-based nonprofit environmental policy organization with 1.2 million members and activists.¹ We are writing to bring to the public's attention our serious concern with the Feb 15-16, 2011 WHO, OECD and ILSI/HESI Workshop on Risk Assessment of Combined Exposures to Multiple Chemicals. This workshop is jointly coordinated by the World Health Organization (WHO), the Organisation for Economic Co-operation and Development (OECD), and the International Life Sciences Institute Health and Environmental Sciences Institute (ILSI/HESI) and will consider risk assessment of combined exposures to multiple chemicals. It is not a public workshop.

ILSI is a global trade organization representing about 500 corporate members including food, chemical, and petrochemical companies.²

While we recognize the right, and even the obligation, of the regulated industry to organize and hold its own events to discuss and address risk assessment issues that will impact the regulation of their products, we believe it is inappropriate for public funds, including the staff time and resources of government organizations and agencies, to support this meeting.

Because this is a meeting co-hosted by the regulated industry and comprised largely of industry scientists on scientific topics for which the industry has a financial stake in the outcome, having government regulators and officials co-host the meeting is an obvious conflict and misuse of publicly-funded experts and officials. No health or environmental non-governmental organization (NGO) stakeholders have been meaningfully involved in the scoping or planning of this workshop, so it hardly represents a balanced forum in which to debate issues of paramount public interest.

How governments consider the risk of multiple chemical exposures will directly impact the regulation of numerous chemicals, including those that are manufactured or used by the companies that are co-hosting this workshop.

Industry scientists are of course free to convene any workshops and meetings they see fit, as can government, academic and NGO scientists. Further, scientists from any sector should be encouraged to cross-talk and attend meetings with experts from all sectors.

If WHO or governments believe they need more input from stakeholders on scientific issues or aspects of *their* chemical assessment practices, they should utilize or convene their own forums and ensure a balance of stakeholders are invited and involved. But to lend their names and personnel (including staff time and resources) to the planning and execution of a non-public forum co-hosted with regulated industries that seeks to advance a clear industry agenda only serves to allow its misuse by such industries as part of their anti-regulatory mission; create at least the appearance of a lack of

impartiality on the part of government agencies; divert public resources to serving industry interests; and compromise the public trust.

NRDC and Environmental Defense Fund (EDF), both US non-profit environmental groups, raised similar concerns in a letter sent on December 6, 2010 to the US Environmental Protection Agency (EPA), the US Food and Drug Administration (FDA), and the US National Institutes of Health (NIH/NIEHS). That letter raised our concern about an initiative spearheaded by ILSI, known as Risk21.³ All financial support for Risk21 is listed on the event website as coming from the following ILSI members: BASF Chemical Co., Dow Chemical Co./Dow AgroSciences, Bayer CropScience, ExxonMobil, Syngenta, Monsanto, DuPont, and The Coca Cola Company.⁴ Government participants are listed on the Risk21 website as including NIH/NIEHS, US EPA, and US FDA.⁵

We hope this is not a trend in the way WHO or governments are seeking advice from the regulated industry. We urge the WHO and governments to refrain from supporting or participating in non-public initiatives with private companies or industry-financed affiliates.

Respectfully,

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¹ More information about NRDC is on our website at www.nrdc.org

² ILSI members in 2009 can be viewed in their 2009 Board Report.
http://www.ilsi.org/Documents/ILSI_AR_09_Web_2.pdf

³ ILSI Health and Environmental Sciences Institute Risk Assessment in the 21st Century Project.
<http://www.hesiglobal.org/i4a/pages/index.cfm?pageid=3492>

⁴ http://www.hesiglobal.org/files/public/Factsheets/2010/Risk21_2010.pdf

⁵ <http://www.hesiglobal.org/i4a/pages/index.cfm?pageid=3492>