September 13, 2018

Dear Conferee,

We write in strong opposition to Section 229 of the House Labor, Health and Human Services, Education, and Related Agencies measure. This provision would deprive the International Agency for Research on Cancer (IARC) of critical funding unless it complies with a series of politically motivated tasks designed to interfere with objective science. In fact, Section 229 continues the flagrant attacks that we have seen on high quality and objective science in other venues. It is part of a broader effort to manipulate chemical assessments and leave Americans more vulnerable to harmful chemicals. As you negotiate a final bill, we urge rejection of House Section 229 which has no place in an appropriations bill.

IARC serves the critical role of identifying links between commonly used chemicals and cancer. Subjecting this important work to political reprisal is reckless and unacceptable. Yet, Section 229 would defund IARC unless the National Institute of Health (NIH) answers unreasonable requests designed to waste resources and invite interference. Below, each of Section 229’s requirements are discussed:

- **Makes funding for IARC chemical assessments contingent upon adoption of a review process in which drafts and revisions are publicly available online:** IARC’s working group format is a deliberative process where drafts evolve through discussion and peer review. Section 229 allows industry to politicize the process by emphasizing incomplete draft portions of the assessment, before they have undergone full vetting and quality assurance by the Working Group. For this reason, the National Academy of Sciences (NAS) does not share deliberative or draft products, routinely noting that: “the review comments and draft manuscript remain confidential to protect the integrity of the deliberative process.” Section 229 also allows industry to cherry pick portions of an assessment that depict a misleading picture when presented out of context.

- **Requires NIH to ensure the IARC chemical assessment program has a process to address conflicts of interests, even though IARC already has a strong process in place:** This requirement attempts to politicize IARC’s work and inject controversy where none exists. IARC already has an excellent and public process to address conflicts of interest. Industry-affiliated scientists may be included when they are authors and researchers on key studies being considered by IARC.

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others are also invited as non-voting observers, and regulated industry members attend meetings regularly.\(^2\)

- **Makes funding for the IARC chemical assessment program contingent on revising its existing successful process with requirements that can be misused by the chemical industry:** Section 229 requires IARC to demonstrate compliance with vague and undefined terms that can be used to exclude studies that industry does not want. The vagueness of this requirement could, for instance, be applied so that qualified scientific studies only cover a minimum checklist of items needed for regulatory approval rather than identifying new risks from common chemicals.

- **Makes funding for the IARC chemical assessment program contingent on providing summaries of studies that do not support the Agency’s conclusions:** It will not improve the quality or quantity of IARC assessments if it must spend resources evaluating and summarizing studies that do not meet the IARC’s criteria of sufficient quality to be included in its assessment. The IARC already reviews all publicly available studies and provides short explanations for why the study didn’t meet its criteria and provides a transparent detailing of its systematic review process for study selection and evaluation.

Congress should protect human lives and by extension, the work that informs those efforts. Instead, Section 229 attempts to do exactly the opposite. IARC’s lifesaving work should be free of political interference. We once again urge you to reject this provision in any final appropriations agreement.

Respectfully,

Jennifer Sass, PhD  
Senior Scientist  
Natural Resources Defense Council

This letter is supported by the following 17 organizations and 114 individual physicians, scientists, and health professionals from the US and around the world that recognize the global importance of the work of IARC to identify carcinogens and support public health policies to prevent disease and deaths from cancer.

\(^2\) Guidelines for Observers at IARC Monographs Meetings  
https://monographs.iarc.fr/guidelines-for-observers-at-iarc-monographs-meetings/
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