



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 Institutes 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.<sup>1</sup> Industry-affiliated scientists may be included when they are authors and researchers on key studies being considered by IARC. Industry and

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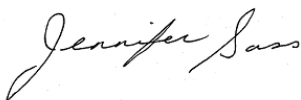
<sup>1</sup> Preamble to the IARC Monographs – General Principles and Procedures. <https://monographs.iarc.fr/preamble-to-the-iarc-monographs-amended-january-2006/preamble-to-the-iarc-monographs-5/>

others are also invited as non-voting observers, and regulated industry members attend meetings regularly.<sup>2</sup>

- ***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.

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<sup>2</sup> Guidelines for Observers at IARC Monographs Meetings  
<https://monographs.iarc.fr/guidelines-for-observers-at-iarc-monographs-meetings/>

## ORGANIZATIONS

Alaska Community Action on Toxics  
Pamela Miller  
USA

Breast Cancer Prevention Partners  
Kathryn Bache  
USA

Center for Biological Diversity  
Nathan Donley, PhD  
USA

Coming Clean  
Steven Taylor  
USA

Farmworker Association of Florida  
Jeannie Economos  
USA

Healthy Building Network  
Tom Lent  
USA

International campaign for Responsible  
Technology  
Amanda Hawes  
USA

Just Transition Alliance  
Jose Bravo  
USA

Made Safe/Nontoxic Certified  
Amy Ziff  
USA  
Maryland Pesticide Education Network  
Ruth Berlin, MSW  
USA

Pesticide Action Network  
Emily Marquez, Ph.D.  
USA

Physicians for Social Responsibility  
Erica Frank, MD, MPH, FACPM  
USA

SafeWork Washington  
Jay Herzmark  
USA

The Endocrine Disruption Exchange  
Katherine Pelch, PhD  
USA

The Selikoff Fund  
Sheldon W. Samuels  
USA

Union of Concerned Scientists  
Kathleen Rest, PhD, MPA  
USA

Women's Voices for the Earth  
Alexandra Scranton, M.S.  
USA

## PHYSICIANS, SCIENTISTS, AND HEALTH PROFESSIONALS

*Affiliations provided for identification purposes only and do not constitute institutional endorsement*

Shahieda Adams, PhD  
University of Cape Town UCT  
Division of Occupational Medicine  
South Africa

John Adgate, PhD, MSPH  
Colorado School of Public Health  
USA

Maria Albin, MD PhD  
Karolinska Institute, Stockholm  
Sweden

Laura Anderko  
Georgetown University  
USA

John Andrews, MD  
USA

Nicholas A. Ashford, PhD  
Massachusetts Institute of Technology  
USA

Xaver Baur, MD  
European Society for  
Environmental and Occupational Medicine  
EU

Fiorella Belpoggi, PhD  
Ramazzini Institute,  
Cesare Maltoni Cancer Research Center  
Italy

Fabrizio Bianchi, PhD  
Institute Clinical Physiology,  
National Research Council,  
Italy

Heinzow Birger, MD  
Environmental Health and Toxicology  
Germany

Anne Blake, PhD  
Environmental & Public Health Consulting  
USA

Maarten C. Bosland, DVSc, PhD  
University of Illinois at Chicago  
USA

Karin Broberg, PhD  
Karolinska Institute, Lund University  
Sweden

Diane Matthew Brown, MS Safety Management  
Labor of Love Safety Training  
USA

Jane C. Caldwell, PhD  
Retired - US Environmental Protection Agency  
USA

Carla Campbell, MD, MS, FAAP  
University of Texas at El Paso  
USA

Ferran Campillo, MD  
Hospital d'Olot i Comarcal de la Garrotxa  
Spain

Barry Castleman, ScD  
Environmental Consultant  
USA

Chin-Kuo Chang, PhD  
University of Taipei  
Taiwan Republic

Aimin Chen, MD, PhD  
University of Cincinnati  
USA

Pay-Chung Chen, PHD  
National Taiwan University  
Taiwan Republic

Martin Cherniak, MD, MPH  
University of Connecticut School of Medicine  
USA

Bongkyoo Choi, ScD, MPH  
University of California Irvine  
USA

Arnab Roy Chowdhury, PhD  
National Research University  
Higher School of Economics  
Russia

Lilian Corra, MD  
International Society of  
Doctors for the Environment  
Sweden

Naransukh Damiran, PhD  
Mongolian Association of Occupational  
Hygiene  
Mongolia

Nguyen Bich Diep  
The Vietnam Institute of  
Occupational & Environmental Health  
Vietnam

David Eastmond, PhD  
University of California Riverside  
USA

Lawrence Engel, MS, PhD  
University of North Carolina Chapel Hill  
USA

Stephanie Engel, PhD  
University of North Carolina Chapel Hill  
USA

Davide Degli Esposti, PhD  
National Research Institute of  
Science and Technology for Environment and  
Agriculture  
France

Cathey Falvo, MD, MPH  
International Society of Doctors for the  
Environment

John R. Froines, PhD  
UCLA School of Public Health  
USA

David Gee, BA  
IEHS Brunel University London  
UK

Michael Gochfeld, MD, PhD  
Rutgers University  
USA

Lynn R. Goldman, PhD  
George Washington University  
USA

David F. Goldsmith, PhD  
Georgetown University  
George Washington Universities  
USA

Ruth Gonseth, MD  
International Society of  
Doctors for the Environment - ISDE  
Switzerland

Philippe Grandjean, MD  
Harvard T.H. Chan School of Public Health  
USA

Joseph Graziano, PhD  
Mailman School of Public Health  
Columbia University  
USA

David H. Groth, MD  
Retired, NIOSH  
USA

Tee L. Guidotti, MD, MPH, DABT  
Occupational Environmental Health & Medicine  
Canada

Neela Guha, PhD  
USA

Lennart Hardell, PhD  
The Environment and Cancer Research  
Foundation  
Sweden

Robert Harrison, MD, MPH  
University of California San Francisco  
USA

Russ Hauser, MD, ScD, MPH  
Harvard School of Public Health  
USA

Alastair Hay, PhD  
University of Leeds  
UK

Stephen S. Hecht, PhD  
University of Minnesota  
USA

Kari Hemminki, MD, PhD  
German Cancer Res Center  
University of Heidelberg  
Germany

Denis L Henshaw, PhD  
Children with Cancer  
UK

Christer Hogstedt, MD  
Institute of Environmental Medicine  
Karolinska Institute  
Sweden

C. Vyvyan Howard, MB, ChB, PhD, FRCPath  
Ulster University  
UK

Peter I. Infante, DrPH.  
Retired, US Occupational Safety and Health  
Admin  
Peter F. Infante Consulting, LLC  
USA

Richard J Jackson MD, MPH  
UCLA Fielding School of Public Health  
USA

Kristina Jakobsson MD, PhD  
University of Gothenburg  
Sweden

Mohamed Jeebhay, MBChB, DOH, MPH, PhD  
University of Cape Town  
South Africa

Paul Jobin, PhD  
Academia Sinica  
Taiwan

Barry L. Johnson, PhD  
Emory University  
USA

Tushar Kant Joshi, MS, MSC, FFOM  
Ministry of Environment  
India

Han K Kang, Dr.PH  
Retired, U.S. Department of Veterans Affairs  
USA

Karl T Kelsey, MD, MOH  
Brown University  
USA

Dave Knight, MBChB, MMed, FCPHM  
University of Cape Town  
South Africa

Bruce Lanphear, MD, MPH  
Simon Fraser University, Vancouver  
Canada

Elsebeth Lynge, Professor  
University of Copenhagen  
Denmark

Steven Markowitz MD, DrPH  
City University of New York  
USA

David L. McCormick, PhD, DABT  
Illinois Institute of Technology  
Research Institute  
USA

Ronald Melnick, PhD  
Retired, NIEHS, National Institutes of Health  
USA

David Michaels, PhD, MPH  
George Washington University  
School of Public Health  
USA

Franklin E. Mirer, PhD  
CUNY School of Public Health  
USA

Xabier Mitxelena  
Basque Health Service  
Spain

Celeste Monforton, DrPH, MPH  
Milken Institute School of Public Health  
George Washington University  
USA

Hanns Moshhammer, MD  
Medical University of Vienna  
Austria

Nicola Murgia, MD, PhD  
University of Perugia  
Italy

Benoit Nemery, MD, PhD  
KU Leuven, Leuven  
Belgium

Lee S. Newman, MD, MA  
Center for Health, Work and Environment,  
Colorado School of Public Health,  
University of Colorado  
USA

Maureen O'Donnell, BSc  
Certified Industrial Hygienist  
USA

Kenneth Olden, PhD  
Retired, Former Director NIEHS/NTP  
National Institutes of Health  
USA

L. Christine Oliver, MD, MPH, MS  
Dalla Lana School of Public Health,  
University of Toronto  
Occupational Health Initiatives, Inc.  
Canada

Rory O'Neill, BSc CSP MIOSH  
University of Liverpool  
UK

David Ozonoff, MD  
Boston University School of Public Health  
USA

Jerome A. Paulson, MD  
George Washington University  
USA

Daniela Pelclova, MD, PhD.  
Charles University, Prague,  
Czech Rep

Frederica Perera, PhD  
Columbia University  
USA

Varduhi Petrosyan, PhD, MS  
School of Public Health,  
American University of Armenia  
Armenia

Charles Poole, BA, MPH, ScD  
University of North Carolina  
USA

Gail S. Prins, PhD  
University of Illinois at Chicago  
USA

Richard Rabin, MSPH; MA  
Massachusetts Coalition for  
Occupational Safety and Health  
USA

Carol Rice, PhD  
University of Cincinnati College of Medicine  
USA

Beate Ritz MD, PhD  
University California Los Angeles  
USA

Aida Galeano Rojas, MD  
Pediatrics, Environmental, and Public Health  
Paraguay

Kenneth Rosenman, MD  
Michigan State University  
USA

Ted Schettler, MD, MPH  
Science and Environmental Health Network  
USA

Lianne Sheppard, PhD  
University of Washington  
USA

Malcolm Sim, MD  
Occupational and Environmental Health  
Sciences  
Monash University  
Australia

Darius D. Sivin, PhD  
USA

Craig Slatin, Professor Emeritus  
Department of Public Health  
University of Massachusetts Lowell  
USA

Martyn Smith, PhD  
University California Berkeley  
USA

Morando Soffritti, MD  
Ramazzini Institute  
Italy

Colin L. Soskolne, PhD  
University of Alberta and University of  
Canberra  
Canada

Leslie Stayner, PhD  
University of Illinois at Chicago  
USA

William A. Suk, PD., MS, PhD, MPH  
Retired, National Institutes of Health  
USA

Patrice Sutton, MPH  
University California San Francisco  
USA

Tanya Khemet Taiwo, MPH  
University California Davis  
USA

Ken Takahashi, MD  
Asbestos Diseases Research Institute  
University of Sydney  
Australia

Daniel Teitelbaum, MD  
Colorado School of Public Health  
USA

Benedetto Terracini, MD  
University of Torino  
Italy

Marina Thorborg, PhD  
Södertörn University  
Sweden

Matilda van den Bosch, PhD, MD  
University of British Columbia  
Canada

Andrew Watterson, PhD  
University of Stirling  
Scotland, UK

Ying Chee Wei  
National Taiwan University  
Taiwan

Dennis D Weisenburger, MD  
City of Hope Medical Center  
USA

Laura Welch, MD  
George Washington University  
USA

Robin Whyatt, DrPH  
Professor Emeritus,  
Department of Environmental Health Sciences  
Mailman School of Public Health,  
Columbia University  
USA

Hans-Joachim Woitowitz, MD  
University of Giessen, Medical Faculty  
Germany





**NATURAL RESOURCES DEFENSE COUNCIL**

40 W 20TH STREET | NEW YORK, NY | 10011 | T 212.727.2700 | F 212.727.1773 | [NRDC.ORG](http://NRDC.ORG)