



Dr. Christopher Wild
Director
International Agency for Research on Cancer
150 Cours Albert Thomas
69372 Lyon CEDEX 08
France

June 22, 2018

Dear Dr. Wild:

The Campaign for Accuracy in Public Health Research (CAPHR) Coalition recognizes the impact of the IARC Monographs Program on public health, public policy, and commercial decisions around the world. IARC's intent to update the Preamble, which describes the general principles and procedures used in developing Monographs, provides a critical opportunity to move toward much-needed reform of the program. Given the importance of the Preamble and its long-lasting implications for the Monographs Program, the CAPHR Coalition believes that IARC should defer the revision process until the director-elect assumes leadership of the organization.

The Monographs Preamble requires a top-to-bottom, comprehensive review. We are greatly concerned that the planned review—which will take place just weeks before Dr. Elisabete Weiderpass steps into her new role—will be cursory in nature and gloss over the many documented shortcomings of the procedures of the Monographs Program. It is appropriate for Dr. Weiderpass to assume responsibility for revising a document that could define her tenure.

A comprehensive review of the Preamble would include (but not be limited to) evaluating the procedures by which the Monographs Program:

- Identifies and reviews relevant studies for quality and reliability of methods, data, analyses, and findings;
- Integrates studies of differing quality and dissimilar findings within a given line of evidence and across lines of evidence, including studies which show no biologically significant findings;
- Ensures the transparency and reproducibility in integrating mechanistic studies to arrive at conclusions as level of evidence being high, moderate or low;
- Engages stakeholders and outside experts, and evaluates conflicts of interest;
- Ensures working groups are composed of qualified scientists with a range of expertise and perspectives;
- Follows best practices for peer review; and
- Communicates findings with appropriate context.



The CAPHR Coalition is an education and outreach initiative to promote credible, unbiased, and balanced assessments of science as the basis of policy decisions, and to help the public and policymakers understand the relevance of public health studies in our daily lives. As a diverse group of industry and business organizations, we have challenged the Monographs Program's troubling practice of producing questionable scientific evaluations and promoting those evaluations as the basis for unjustified public policy or commercial decisions.

As a globally-recognized voice, it is critical that IARC continues to make important contributions towards public health. We again request an opportunity to meet with you to discuss this important issue face-to-face. You can reach me via Nicole Mlade at +(202) 249-6422 or nicole_mlade@americanchemistry.com. We thank you for considering this recommendation.

Sincerely,

Cal Dooley

President, American Chemistry Council (CAPHR member)

Cc: Dr. Kurt Straif, Section Head, IARC Monographs Program
Dr. Elisabete Weiderpass, Director-Elect, IARC
CAPHR Coalition Members

