



October 11, 2005

Comments by the Natural Resources Defense Council on the proposed changes to the IARC Monographs preamble.

Comments submitted electronically to: cie@iarc.fr

Comments due October 31, 2005

Information for comment found at: <http://www-cie.iarc.fr/>

The Natural Resources Defense Council (NRDC) is a U.S. non-profit organization dedicated to improving public health and protecting ecological integrity. We use law, science and the support of more than 1 million members and online activists to ensure a safe and healthy environment for all living things. We have offices in New York, Washington DC, San Francisco, and Los Angeles. More information can be found at our website at www.nrdc.org

Neither myself nor NRDC will receive any compensation for drafting or submitting these comments.

NRDC considers itself to be a strong supporter and friend of the IARC Monographs Programme; we look forward to its continued success. In particular, we wish to congratulate the Monograph staff on the following measures:

- The articulation and implementation of the World Health Organization conflict of interest policy, including describing that policy in the scientific literature (Cogliano et al, 2004, EHP).
- Public notice of the results from recent Monographs meetings through press releases and short communications in the scientific literature (EHP, Lancet Oncology).
- Recent changes to the website to include agents to be reviewed, working group members, and easy ability to request observer status to attend the meetings. <http://www-cie.iarc.fr/>
- The recent proposed changes to the preamble to increase transparency and contribute to sound health protective policy (August 2005).

The work of the Monographs staff and working group members shapes the way national and local governments set pollution limits, call for clean up actions, and evaluate compensation claims from injuries incurred through exposure to cancer-causing agents. The IARC Monographs Programme must continually re-earn the public trust through sustained scientific excellence and integrity, carried out in an objective, publicly transparent process. We congratulate IARC on its proposed changes to the preamble as necessary steps towards improving the transparency, objectivity, and scientific quality of the Monographs.

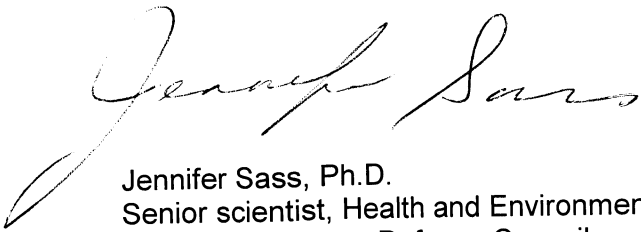
We wish to comment more specifically on the proposed changes to the preamble here:

- Although we support the integration of quantitative assessments when the data is sufficiently robust to allow such an evaluation, we strongly caution the IARC that

- such evaluations are difficult, and should not be used to declare a “safe” level of exposure on the basis of incomplete or insufficient data, or untested hypotheses.
- We strongly support the expanded definition of a carcinogen to include exposures that can reduce the latency or increase the severity or multiplicity of malignant neoplasms.
 - While we support the facilitation of international scientific conferences to develop consensus positions on the use of mechanistic data, we caution that participants must be free from financial constraints, as required by the WHO conflict of interest guidelines as implemented by the IARC. Anything less is likely to elicit mistrust from the scientific community.
 - We support the clarification of the roles of Working Group Members, Invited Specialists, Representatives of national and international health agencies, Observers, and the IARC Secretariat. We commend the IARC on the creation of the invited specialists category as an excellent solution to wanting key scientific authorities present at the meeting, but limiting or eliminating voting members with financial conflicts.
 - We support the procedures of IARC to solicit conflict of interest declarations both before invitations are extended, and then again at the opening of the meeting. The purpose of such procedures is to identify and eliminate conflicts in an environment that encourages full disclosure.
 - We support limiting the invited specialist from allowing them to write text for the evaluations. IARC correctly notes that public confidence in the impartiality of IARC evaluations may be compromised by having invited specialists with conflicts contribute text.
 - We are encouraged by the explicit mention of the value of exposure information from national agencies and UN agencies. We expect that this exciting new data will be useful for IARC. We are especially encouraged by the explicit encouragement to the Working Group to obtain exposure data from developing countries, where available. This important information will greatly aid both the IARC Monograph evaluation and also the relevancy and public interpretation of the evaluation.
 - We are strongly encouraged by the inclusion of a new section on susceptible individuals, populations, and life-stages. This will greatly increase the value of evaluations for regulatory agencies and academic scientists. The application of toxicokinetics and mechanistic data in this section will likely provide valuable information for the public and for regulators, although it must be interpreted with caution, recognizing its limitations. Mechanistic information may enhance the interpretation of traditional toxicological and epidemiological data.
 - We strongly support the consideration of developmental and reproductive toxicity data as they pertain to cancer evaluations. This addition will strengthen the evaluations of the Monographs, and increase their utility.
 - We are especially encouraged by the creation of a new section for summary and integration that will describe the rationale for the working group evaluation. This will be instructive for the public and for regulators using the evaluation, and will strengthen public confidence in the evaluation process. We applaud the increased transparency that this section represents, and trust that it will increase public confidence and understanding in the evaluation process.
 - We support the identification of specific target organs in the evaluation as a more accurate and transparent representation of the data and the evaluation process taken by the working group.

- We support the consideration of studies such as those from the National Toxicology Program as providing evidence in both sexes of a single species. We support changes to the Preamble where it now states that positive results in both sexes of a single species in a study conducted with Good Laboratory Practices can provide sufficient evidence of carcinogenicity. Such robust data from well-designed and executed studies should be fully used by IARC and by other agencies.
- We support the additional limitations on the conclusion of “evidence suggesting lack of carcinogenicity” to now include age at exposure and other exposure conditions. Such a classification should not be made without overwhelming evidence, as the potential public health consequences may be devastating if the evaluation is in error.
- We support the updated evaluation criteria according to the Advisory Group recommendation that an agent can be characterized as possibly carcinogenic to humans based solely on strong mechanistic data. Use of mechanistic data in lieu of cancer bioassays should be done with caution, of course, but is consistent with increasing confidence in mechanistic data from well-designed and well-executed studies such as those from the National Toxicology Program.
- We support the replacement of the term “chemical compound” with “agent” to reflect the broader scope of the programme, just as we support the broad scope of the programme.

Thank you for the opportunity to provide comments,



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