

Dr. Paul Kleihues
February 4, 2002
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February 7, 2002

Dr. Paul Kleihues
Director
International Agency for Research on Cancer
150 cours Albert Thomas
F-69372 Lyon CEDEX 08
FRANCE

Dear Dr. Kleihues:

The Office of Environmental Health Hazard Assessment (OEHHA) develops risk assessments for California regulatory programs that manage risks from environmental exposures to chemicals. In the course of performing these assessments, OEHHA regularly makes use of the International Agency for Research on Cancer (IARC) *Monographs on the Evaluation of Carcinogenic Risks to Humans*. Given our heavy reliance upon the IARC *Monographs*, we are concerned that the high quality of the information and scientific analyses available through the IARC *Monographs* be maintained. The purpose of this letter is to express our concern about IARC's use in *Monograph Working Groups* of individuals that may have economic interest in the chemical being evaluated.

The IARC *Monographs* serve an important public health function as a repository of carcinogenicity judgments for communities, governments and private sector businesses throughout the world that are attempting to evaluate the carcinogenicity of chemicals to which the public is exposed. The IARC *Monographs* have been considered an authoritative source and are easily accessible. The use of individuals with potential economic conflicts of interest on IARC Working Groups devalues the usefulness of the IARC *Monographs* for public health information. The mere specter of a perceived economic conflict of interest undermines the credibility of the work produced and potentially jeopardizes the public trust in your program and the *Monographs*.

If consultants or employees of companies that have economic interests in the outcome of whether a specific substance is considered a carcinogen sit on Working Groups considering such chemicals, economic considerations cannot be ruled out as influences on the outcome of the IARC assessment. Please note that individuals on your Working Group for the upcoming February 2002 meeting on styrene, naphthalene, some mycotoxins, and traditional herbal medicines appear to have such conflicts; they have been funded or sponsored by the industry to

advocate certain positions on the chemicals under review. For example, styrene is under consideration for listing as causing cancer under California's Proposition 65 program. If styrene is listed, this action could economically impact the styrene industry. Dr. Carlson, funded by the Styrene Information and Research Center (SIRC), an industry group, came to speak with us about his laboratory's finding of a lack of metabolism of styrene to styrene oxide (in contrast to findings of other researchers); Dr. George Cruzan, a consultant for SIRC, came to speak to us multiple times regarding the recent rodent bioassays on styrene sponsored by the styrene industry (i.e., SIRC). Dr. James A. Bond, while not currently at the Chemical Industry Institute for Toxicology (CIIT), for many years conducted industry-funded research at CIIT on styrene and related compounds. Thus the only toxicologists on the IARC Working Group with a publication record on styrene relevant to the evaluation of its carcinogenicity have direct or recent economic ties with the industry. This skewed composition may especially call into question the Working Group's finding on carcinogenicity regarding animal evidence and its overall evaluation of styrene. We have not reviewed the other working group members with respect to conflict of interest; however, we believe IARC has an obligation to do so.

Our primary concern is that the scientific integrity of the IARC *Monographs* be maintained and that we can rely on IARC's evaluations, such as it will make for all chemicals, including styrene. Because IARC *Monographs* do not undergo public review and are designed to reflect the opinion of convened experts, there is no opportunity to correct errors in judgment. We would suggest the evaluation of styrene be postponed until such time as a review of conflict of interest is performed to assure that a conflict does not exist.

If you would like to discuss this further, or have any questions, please feel free to contact me at (916) 322-6325.

Sincerely,

Joan E. Denton, Ph.D.
Director

Enclosure

cc: See next page

cc: Dr. Jerry M. Rice
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