Glyphosate classification by the International Agency for Research on Cancer (IARC):

Objective facts questioning its neutrality.

The IARC glyphosate working group met from March 3 to 10, 2015. It was composed of 17 members and chaired by Aaron Blair. The group classified this herbicide as a "probable carcinogen", without being followed by any scientific agency in the world (see ANNEX 1). How can this be explained?

This compilation contains documents made public following the legal proceedings (depositions) in the context of the lawsuits against Monsanto in the United States.

A number of converging facts allow to question the "ideological" neutrality of several members of this working group, the obvious conflicts of interest of some of them (in connection with predatory law firms using the IARC rankings) and, in general, a lack of transparency - clearly voluntary - of IARC on its working procedures.

It is also noted that studies that should have changed the classification of glyphosate were not examined on the grounds that they were not published (a rule not always applied by IARC in the past) despite the fact that Working Group Chairman Blair was aware of their results because he was involved in these studies.

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Deposition of Aaron Blair

Retired from National Cancer Institutes (USA), Chair of the IARC Working Group 112 classifying glyphosate.

Full transcript of the Deposition:

https://usrtk.org/wp-content/uploads/2017/06/Blair-transcript.pdf

Significant excerpts, copied and pasted below (Q: question; A: Blair's answer).

Point 1. Failure to take into account the AHS epidemiological study

This working group did not take into account the most recent results from the Agricultural Health Study (AHS), a large cohort of 89,000 farmers and spouses from Iowa and North Carolina, which does not show a link between glyphosate exposure and cancer.

Blair explains that IARC only considers published data. Yet Blair was aware of the results because he co-authored the study.

```
Q Okay. Now, for the first time we're
talking about a study here, the AHS study. I want to
ask you about it: "The AHS cohort did not show a
significantly increased risk of non-Hodgkin's
lymphoma."
```

```
Golkow Technologies, Inc.
                                                     Page 69
  1
                So there was a study that did not show
  2
    the association between -- between glyphosate and
  3 non-Hodgkin's lymphoma, right?
              Yes.
  4
                MR. LASKER: Objection to form.
  5
     BY MR. MILLER:
  7
           0
               And in fact, you were the author of that
     study, or one of them, right, sir?
  8
               One of the authors.
  9
           Α
 10
               And in spite of being the author of the
    study that didn't show the association, you voted
 11
 12
     that in fact there was an association based on the
 13
     totality of the evidence, right, sir?
 14
               MR. LASKER: Objection to form.
 15
               THE WITNESS: Yes.
```

Point 2. Failure to take into account the NAPP meta-analysis

Similarly, the working group did not take into account the results of the North American Pooled Project (NAPP) meta-analysis. Blair was also aware of these results (no correlation between

glyphosate exposure and cancer) as he was involved in the study.

```
I want to ask you a little bit about the

North American Pooled Project, the NAPP. It's

"Pooled analyses of case-control studies of

pesticides and agriculture exposures,

lymphohematopoietic cancers" --

A Yes.
```

Golkow Technologies, Inc.

Page 79

```
1 Q -- "and sarcomas."
2 Are you one of the authors of this new
3 study?
4 A One of the authors of these papers, yes.
5 Q Yes. And I will mark it as Exhibit 7, a
```

Page 140

```
Q Okay. So there was no statistically
significant association between glyphosate exposure
and multiple myeloma in the NAPP data, correct?

A Correct.
```

Undeniable conclusions of points 1 and 2.

In both cases, Blair did not inform the task force of these recent negative results and let the group vote in favor of an association between glyphosate exposure and cancer (non-Hodgkin's lymphoma). He himself voted in favor although he knew it was wrong:

```
22 Q Did you mention the NAPP findings of no
23 association between glyphosate and multiple myeloma
24 to any of your fellow working group members during
25 the Monograph 112 deliberations?

Golkow Technologies, Inc.

Page 143
```

```
1 A I don't think so. But I don't recall for
2 sure. It wasn't published.
```

In addition, Blair stated that had the IARC reviewed the more recent data available at the time of the Glyphosate Working Group meeting, the outcome of the IARC decision on glyphosate would have been different:

```
5
               So it's fair to say, given that IARC --
6
   your meta-analysis was just barely statistically
7
    significant at 1.03 in the lower bound, if IARC had
8
    had the data from the 2013 study, much more -- a much
9
    larger study, much greater weight, lower relative
10
    risk -- that would have driven the meta-relative risk
11
    downward, correct?
12
          A Correct.
```

Points 3 and 4. Inexplicably delayed publications

In these two studies, the depositions revealed that the authors of these studies wished to publish their results quickly so that it could be taken into account by the IARC working group. In both cases, studies taken into account glyphosate were only published after the IARC classification.

Point 3

For the AHS study, a scientific article entitled "Non-Hodgkin Lymphoma Risk and Insecticide, Fungicide and Fumicide Use in the Agricultural Health Study" was submitted on March 2014 (published in October 2014) by Alavanja et al.

(<u>https://www.ncbi.nlm.nih.gov/pubmed/25337994</u>), but this article does not include the herbicides studied by the AHS.

In an email related to this publication, https://usrtk.org/wp-content/uploads/2017/06/Blair-21.pdf Alavanja writes on February 28, 2014 to his co-authors, including Aaron Blair:

"At the current time IARC is making plans for a new monograph on pesticides. Considering IARCs timetable for selecting candidate pesticide for the monograph, it would be irresponsible if we didn't seek publication of our NHL manuscript in time to influence IARCs decision".

Despite the urgency noted by Alavanja, the data on glyphosate were finally submitted for publication only 3 years and 5 months later (August 22, 2017) and published on November 9, https://academic.oup.com/jnci/advance-article-

abstract/doi/10.1093/jnci/djx233/4590280?redirectedFrom=fulltext

Point 4

Regarding the study NAPP, an email from one of the authors mentions the possibility of having a first draft ready in the coming weeks, for submission early 2015 or before, but the article was finally submitted on June 2016. Blair does not provide any explanation as to the delay.

```
3
              And then the second paragraph, the last
   sentence, starting at the end of line 2: "I expect
   we will have a draft to review in the next few weeks
    and a paper could be submitted early in the new year
   or before." Correct?
8
          A
              Okav. Yes.
9
          Q
             And you were copied on obviously this
10
   e-mail that sets forth the NAPP data for glyphosate
11
    and multiple myeloma, correct?
12
          A Correct.
13
              But despite the fact that you had this
14
    data and it was in a form that could be submitted for
15
    review and submitted for publication in time for the
16
    IARC Monograph, this data was not in fact published
17
    in time for the IARC Monograph 112 review, was it?
18
          A I think not.
19
          0
               In fact, the data was not published until
20
    June of 2016, some twenty months later and well after
    the IARC working group had conducted its review of
    glyphosate, correct?
```

Conclusions of points 3 and 4

The IARC issued its opinion while the publications on two major studies invalidating the link between glyphosate and cancer, known to some of its experts, had been inexplicably delayed. IARC justified itself on the grounds that it does not take into account unpublished studies.

Would it not have been reasonable and responsible to defer the work pending the publication of such important studies?

Deposition of Christopher J. Portier,

Participant in the IARC working group from March 3 to 10, 2015, as an "invited specialist". Full transcript of the deposition:

https://usrtk.org/wp-content/uploads/2017/10/Portier-related-documents-and-contract.pdf Significant excerpts, copied and pasted below (Q: question; A: Portier's answer).

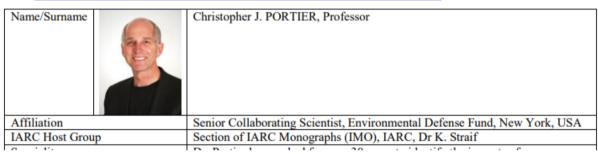
Point1. A documented lack of neutrality

Prior to joining IARC, Portier worked for years as a consultant for the Environmental Defense Fund (EDF), an anti-pesticide lobbying group.

https://www.edf.org/people/senior-contributing-scientists

Portier co-signed an article (published on February 1, 2014) against the retraction of Séralini's discredited article: https://ehp.niehs.nih.gov/doi/10.1289/ehp.1408106

This lack of neutrality is known to IARC: affiliation with EDF is mentioned in Portier's biography at IARC: https://www.iarc.fr/wp-content/uploads/2018/07/PORTIER Bio.pdf



Despite his lack of neutrality, Portier was chairman from 7-9 April 2014 of the IARC Monograph Advisory Group which defined the priorities of the CIRC monographs of the CIRC, declaring his conflict of interest only later (see note below):

Christopher J. Portier³ [retired] (Chair)
National Center for Environmental Health and
Agency for Toxic Substances and Disease
Registry
Centers for Disease Control and Prevention
Atlanta, GA
USA

Luis Felipe Ribeiro Pinto

Brazilian National Cancer Institute (INCA) Rio de Janeiro Brazil

Edgar Rivedal

Norwegian Scientific Committee for Food Safety Oslo Norway

³After the conclusion of the meeting, Christopher Portier declared part-time employment by the Environmental Defense Fund, a United Statesbased nonprofit environmental advocacy group

This choice of priorities was the subject of a publication in June 2014 in The Lancet, where the conflicts of interest of President Portier are not mentioned, which triggered a corrigendum of The Lancet in October 2018:

https://www.sciencedirect.com/science/article/pii/S1470204518306533

Despite his lack of neutrality, Portier joined the IARC glyphosate working group. His official title of "specialist (guest)" is all the more surprising since he acknowledges during the depositions before the court to have no expertise in this case:

```
glyphosate for review, had you reviewed the science on glyphosate prior to being appointed to working group 112?

MS. GREENWALD: Objection to form.

A. Prior to being appointed to working group 112, I had not looked at any of the scientific evidence on the carcinogenicity of glyphosate.
```

The questions that arise are:

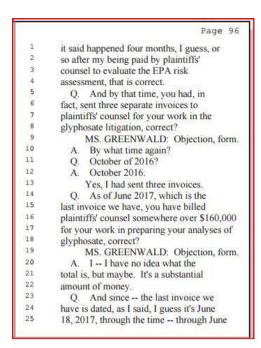
Why is somebody with questionable neutrality chosen to hold IARC responsibilities? Why are his conflicts of interest sometimes not mentioned, in violation of IARC's published standards? https://monographs.iarc.fr/wp-content/uploads/2019/01/Preamble-2019.pdf

Point 2. Financial links with a predatory law firm targeting glyphosate

Portier acknowledged having signed a contract with the law firm Lundy, Lundy, Soleau & South, specializing in complaints against industrial companies (in this case exploiting the IARC's classification of glyphosate, see ANNEX 2) 9 days after publication of the said classification:

```
Page 75
        you had been working for over seven months
        as a paid consultant for plaintiffs'
        counsel in this litigation, correct?
          A. That is correct.
               You signed on as a private
        consultant for plaintiffs' counsel nine
        days -- within nine days of the publication
        of The Lancet article announcing IARC's 2A
        classification of glyphosate, correct?
           A. Where is the date of that again?
11
           Q. We can show that to you.
          A. Here it is, March 29 of 2015.
13
              That appears to be the case.
           Q. When did you first speak with
15
        plaintiffs' counsel about working with them
16
        as an expert in this litigation?
17
           A. March 20 -- soon -- before March
18
        29.
19
              I was already working with
20
        counsel --
21
           Q. OK, so when were you --
22
                -- on something different.
23
           Q.
               So when did you -- let's ask
24
        that.
2.5
               So this is with Mr. Lundy?
```

This contract paid Portier at least US \$ 160,000 (until June 2017), allegedly for the first preparatory work as litigation consultant (travel expenses not included):



Portier acknowledged (with difficulty) that he worked for Lundy two months before March 2015 (i.e. before the date of his involvement in the IARC classification of glyphosate):

	Page 76		Page 77
1	A. I don't know to what degree my	1	you been working with Mr. Lundy?
2	discussions with them become confidential,	2	 A. I don't know. Maybe two months.
3	so I'm at a loss here.	3	Q. When do you recall and
4	Q. I'm not going to ask you about	4	obviously, it's going to be sometime
5	the actual substance of the conversations,	5	would it be fair to say sometime between
6	although that's a separate issue, not a	6	March 20, when the IARC classification was
7	privilege issue, but my question right now	7	announced, and March 29, when you had a
8	is dates.	8	conversation with Mr. Lundy about working
9	When did you	9	as an expert in the glyphosate litigation?
10	A. So that was with Mr. Lundy, in	10	MS. GREENWALD: Objection to
11	answer to your question.	11	form.
12	Q. And you had been working with	12	 The answer is that's not correct.
13	Mr. Lundy on other matters prior to March	13	Q. When did you have your first
14	2015, is that correct?	14	conversation with Mr. Lundy about working
15	 As far as I recall, yes. 	15	as an expert for plaintiffs in glyphosate
16	Q. Were you for those other	16	litigation?
17	matters, have you been disclosed as a	17	A. Sometime prior to this agreement
18	testifying expert in connection with those?	18	here. Maybe a few days. I have no idea.
19	 I'm not a testifying expert in 	19	But the IARC monograph finding
20	those.	20	was announced the day the monograph closed.
21	Q. Do you know if your involvement	21	The publication was later.
22	in that litigation has been publicly	22	Q. Do you recall whether you had
23	disclosed?	23	your first conversation with Mr. Lundy
24	 That I do not know. 	24	before or after The Lancet article was
25	Q. How long prior to March 2015 had	25	published?

Point 3. Portier previously worked with Lundy

Mr. Portier admitted that he was already working for Lundy following another IARC classification:

```
Q. Is the other matter that you are
        working with or -- with Mr. Lundy related
        to a -- and you don't have to identify the
        substance, but a substance that has been
        part of an IARC review for carcinogenistic?
10
          A. There have been many substances
11
        for review by IARC for carcinogenicity,
12
        this one included.
13
          Q. So the other work you're doing
14
        for Mr. Lundy also involves an
15
        IARC-reviewed substance, is that correct?
16
          A That is correct
```

It probably was about radiofrequency electromagnetic fields, classified as "possibly carcinogenic to humans" (Group 2B) in Monograph No. 102 in 2011:

https://www.iarc.fr/wp-content/uploads/2018/07/pr208 F.pdf

Portier was also a member of the corresponding working group and even the chair of the 'Mechanisms' Subgroup:

https://monographs.iarc.fr/wp-content/uploads/2018/06/mono102-F05.pdf

Conclusion: Portier had, therefore, before his involvement in the glyphosate file, a long experience of the profit that can be made thanks to the IARC rankings.

Point 4. An amazing motivation for defending IARC rankings

In the face of criticism of IARC's classification of glyphosate, Portier appears extremely motivated considering he was a simple "guest specialist". In an e-mail to other members of the glyphosate working group, he volunteered to defend the said classification by saying that he would not let the critics question it.

Read the mail:

https://g8fip1kplyr33r3krz5b97d1-wpengine.netdna-ssl.com/wp-content/uploads/2018/07/SPOLITICO20-18070214030.pdf

```
You state in your e-mail to these
         scientists, "I do not intend to let this
        happen.* Correct?
              I do not intend to let the
        strength of the IARC monograph program to
        stimulate change in how these agents are
        reviewed happen, and I do not intend to let
        it happen that people said we did our
        estimate wrong.
           Q. On November 11, 2015, you sent a
12
        follow-up e-mail to a broader group of
13
        recipients, again raising the same concern
1.4
        about the EFSA's conclusion that glyphosate
15
        does not cause cancer, correct?
16
              MS. GREENWALD: Objection, form.
17
              (Exhibit 15-17, e-mail chain
18
          dated November 11, 2005, marked for
19
          identification, as of this date.)
20
          A. OK, what is your question now?
           Q. On November 11, you sent a
        follow-up e-mail to a broader group of
23
        recipients, again raising concerns about
24
        EFSA's conclusion that glyphosate did not
25
        cause cancer, correct?
```

This lead him to travel for glyphosate interviews with the European Commissioner for Health, the European Chemicals Agency, the German Bundestag and various ministries in Europe. Portier concealed his conflicts of interest during these interviews.

At a congress (Ramazzini Days), he even goes on to mention economically motivated activities (of others!) that would have influenced the science of glyphosate:

```
Q. In your poster presentation at
        Ramazzini Days, in the conclusion, you
        state that - you talk about economically
        motivated activities having influenced the
        glyphosate science, correct?
             MS. GREENWALD: Objection, form.
          A. I should pay more attention to
        what my coauthors write sometimes.
              That is what it says.
10
          Q. You do not disclose anywhere in
11
        this poster presentation your role as a
12
        paid expert for plaintiffs' counsel in
13
        private litigation against Monsanto, do
14
15
              MS. GREENWALD: Objection, form.
         A. Not specific. I list myself as
16
17
       an environmental health consultant.
18
           Q. Again, just so the record is
19
        clear, you do not disclose the fact that
20
        you were a paid consultant for plaintiffs'
21
        counsel in private litigation against
22
        Monsanto?

    A. That is correct.
    Q. Now, you're – the point you're
23
24
        making in this poster presentation instead
```

Note that some have considered that the difference between the IARC classification and all other agencies opinions could be explained by different purposes: IARC studies the hazard (theoretical, what one substance can do), the others study the risk (what the substance actually does). But this is NEVER IARC's position, which rather attacks the others, notably EFSA (European Food Safety Authority).

Thus Portier does not stay in a normal scientific framework but rather is extremely virulent against EFSA when the latter contradicts the classification of the IARC.

Read the letter sent on 27 November 2017 to the European Commissioner for Health and Food Safety, Vytenis Andriukaitis:

http://www.efsa.europa.eu/sites/default/files/Prof Portier letter.pdf (note his affiliations at the end of the letter, without no mention to his link to EDF)

Deposition of Charles William Jameson

Member of the IARC Working Group on Glyphosate, Chair of the Subcommittee on Experimental Cancer Animals, he is presented as a consultant:

Charles William Jameson (Subgroup Chair, Cancer in Experimental Animals)

CWJ Consulting, LLC
Cape Coral, FL
USA

https://monographs.iarc.fr/wp-content/uploads/2018/06/mono112-F03.pdf

The Deposition of Mr. Jameson of May 3, 2017

https://usrtk.org/wp-content/uploads/2017/10/May-2017-Deposition-of-Charles-Jameson-1.pdf revealed that he has been an expert used by the plaintiffs' lawyers against Monsanto.

Page 47 work he was doing for other clients. So you have asked privileged information. MR. LASKER: Well, for the record, to the extent that continued instructions not to answer are given by counsel, we will reserve our right to reopen the deposition after we raise that issue with the court and we'll get additional time. 10 BY MR. LASKER: 11 Q. Dr. Jameson, there has been a 12 representation by counsel, but not by you -- so 13 that really is not relevant -- about whether or 14 not you've been retained by an expert --15 retained as an expert by plaintiffs in this 16 litigation. And so let me ask you a question, to 18 your understanding have you been retained as an 19 expert for plaintiffs in this litigation? A. Yes. 20 Q. And have you been retained to your 22 understanding as a testifying expert or a 23 potential testifying expert in this litigation? MS. FORGIE: Objection, privileged. 25 Don't answer.

The demonstrated interests of Jameson.

He was paid to produce an expert report in support of complaints based on the classification of glyphosate by the IARC Working Group

https://usrtk.org/wp-content/uploads/2017/10/Charles-Jameson-expert-report.pdf for an hourly rate of US \$ 400:

scientific certainty that glyphosate and glyphosate-based formulations are probable human carcinogens. I also conclude to a reasonable degree of scientific certainty that glyphosate and glyphosate-based formulations cause NHL in humans.

Compensation and Testimony

My billing rate is \$400/hr plus travel fees and expenses. I have not testified in any case in the last four years.

Charles W. Jameson, Ph.D.

IARC staff: questionable practices and relationships

Point 1. Lack of neutrality of other members of the glyphosate working group

Other members of the IARC working group took part in the attacks against EFSA. At the initiative of Portier, half of the members of the IARC working group signed, with others, a letter dated 27 November 2015 addressed to the European Commissioner for Health and Food Safety, Vytenis Andriukaitis, to urge him to ignore the positive assessment of EFSA on glyphosate. Read the letter and EFSA's reply:

http://www.efsa.europa.eu/en/press/news/160113

In January 2016, Portier was joined by members of the Glyphosate Working Group (Francesco Forastiere, Ivan I. Rusyn and Hans Kromhout) at a private meeting with Commissioner Andriukaitis to lobby against EFSA's position.

https://corporateeurope.org/sites/default/files/attachments/27. bto meeting redacted.pdf

Point 2. A network of inappropriate alliances between IARC staff, members of the IARC working group and activists.

Kurt Straif, Head of the IARC Monograph Section, communicates to C. Portier and Hedwig Emmerig (in charge of biotechnology and bioethics of Alliance 90 / The Green Party at the German Bundestag) a conspiracy article by Carey Gillam, employee of the anti-GMO activist organization USRTK. Clearly, it is to provide ammunition against the conclusion of the Joint FAO / WHO Meeting on Pesticide Residues (which includes glyphosate)

(https://www.who.int/foodsafety/jmprsummary2016.pdf)

To defend the classification of the IARC, they choose to attack another commission of the WHO.



Point 3. Kate Guyton, IARC Officer, and her relationship with activists

E-mails show that Guyton has highlighted attacks by anti-GM activists like GMWatch's Claire Robinson to C. Portier (https://www.deniersforhire.com/deniers-for-hire/chris-porter/) and Martyn T. Smith (https://www.deniersforhire.com/deniers-for-hire/martyn-t-smith/) who worked for IARC, obviously to provide them with ammunition in their own campaign to defend IARC:



Guyton has agreed to "testify" at the parody of justice called "International Monsanto Tribunal" organized by activists, but has not been granted permission to do so by the WHO. Thus prevented to attend, Ms. Guyton proposed to Ms. Robin, one of the organizers, to invite Mr. Blair (Chairman of the working group on glyphosate, and not bound by the same obligation).

The email sent by Robin to Blair, which proves all these elements: https://usrtk.org/wp-content/uploads/2017/06/Blair-25.pdf

Point 4. Outgoing IARC Director Christopher Wild refuses transparency.

Christopher Wild not only refused to attend the hearing of the US House of Representatives Science Committee on the functioning of IARC, but on January 11, 2018, Wild wrote a letter to this commission

https://usrtk.org/wp-content/uploads/2018/01/IARC-letter-back-to-Lamar-Smith.pdf which he concludes saying IARC "would be grateful" if they did not require transparency or tried to access confidential IARC documents and e-mails, and wished "immunity" for this organization.

While assuring you of my commitment to the oversight and accountability of the Agency to its funding sponsors, its governing bodies and the international scientific community, I remain available to respond to further questions you may have about the IARC Monograph Working Group evaluation of glyphosate. Without prejudice to IARC's willingness to facilitate your review by voluntarily responding to reasonable and substantiated requests for information received from appropriate authorities, IARC would be grateful if the House Science Committee would take all necessary measures to ensure that the immunity of the Organization, its officials and experts, as well as the inviolability of its archives and documents, are fully respected.

Yours sincerely,

Christopher P. Wild, PhD

Director

Point 5. Another IARC Transparency Denial

As part of an information request, under US Access to Information Legislation (FOIA), on e-mails exchanged between several scientists from the US EPA and the National Toxicology Program (NTP).), on the one hand, and the Glyphosate IARC scientific team, on the other hand, access to e-mails from these officials was denied, due to IARC's refusal of openness: "the intent of IARC was not to relinquish control of their own records. IARC provided the following information regarding ownership of the records in question: ...it is the position of IARC that all draft documents and materials prepared by the Working Group in advance of or during the in-person Monograph meeting are to be considered draft

and deliberative. Working Group members prepare these materials on behalf of IARC, and not as part of their official employment duties for a state or federal institution, and IARC is the sole owner of all such materials. IARC does not encourage participants to retain working draft documents after the related Monograph has been published"

 $\frac{\text{http://eelegal.org/wp-content/uploads/2016/08/NIEHS-No-Records-Response-to-FOIA-45376-}{8.18.16\text{-.pdf}}$

IARC's questionable working methods

Deposition of Matthew Ross

Member of the working group on glyphosate, specifically involved in subgroup 4 "mechanisms" (which can trigger cancer).

Full transcript:

https://usrtk.org/wp-content/uploads/2017/07/Matthew-Ross-deposition.pdf

It should be noted that the answers provided by Ross are most often of the "I do not know, I do not remember" type. Ross often entrenches himself behind the procedure imposed at the beginning of meetings not to examine unpublished studies in a peer-reviewed journal.

The deposition tells us that this has not been the case in all past IARC monographs. Page 123:

```
Q. Do you know, in working group 118 and working group 119, they looked at non-published literature?
```

Page 124

```
11 Q. Do you know that IARC doesn't always
12 follow what you're saying is the rule of only
13 looking at published literature? Do you know
14 that?
```

Ross did not know ...

To the question whether these studies could have changed his assessment, Ross again hides himself behind the instructions received not to consider these studies.

```
8 Q. Right. So you're agreeing with me.
9 You don't even know what -- you
10 didn't know how that would have affected your
11 analysis?
12 A. I can't speculate on that because we
13 were instructed to look at the publicly available
14 literature.
```

Ross was questioned about a study by Bolognesi and collaborators https://www.tandfonline.com/doi/abs/10.1080/15287390902929741

on people exposed to glyphosate on the border between Colombia and Ecuador after aerial treatments to destroy coca fields. Ross acknowledges that this study has had a significant impact on IARC's findings on glyphosate (increased chromosome damage as interpreted by the IARC study).

```
Q. So the Bolognesi was one of the strong
pieces of evidence that you were relying on for
your conclusions?

A. Not the only piece.

Q. Yes, sir. One of the strong pieces?

A. One of the -- one of -- one of the
```

TSG Reporting - Worldwide 877-702-9580

```
Page 203 strong pieces of evidence.
```

Problem: when questioned, the correspondence author of this article, Keith Solomon, finds the IARC's findings "totally wrong":

The <u>Bolognesi et al</u> paper was used by IARC, claiming that residents in several communities had increased chromosomal damage after spraying glyphosate formulations. Before the monograph was published, one of the authors of that paper, Keith Solomon, claimed that IARC got the conclusion "<u>totally wrong</u>" (there were no differences). Still IARC used the Bolognesi et al paper in their monograph and ignored one of its authors' interventions. Either the IARC authors are blind or politically motivated (probably both and certainly neither scientific nor professional). The EPA's view on the Bolognesi paper was that it was of a very low quality and not worth considering.

On page 242, Ross acknowledges that members of the task force are encouraged not to keep records of the procedures followed:

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    Ms. Guyton was telling you the position of IARC
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    all draft documents and materials prepared by the
    working group in advance or during the in-person
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13
    monograph group meeting are to be considered draft
14
    and deliberative. And she went on to say that
15
    IARC does not encourage participants to retain
16
    working drafts of documents after the related
17
    monograph has been published. Correct?
18
         Α.
              Yes.
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An investigation by journalist Kate Kelland (Reuters)

https://www.reuters.com/investigates/special-report/who-iarc-glyphosate/

On the basis of documents made public during the above-mentioned depositions in the USA, the journalist showed that between a version called "draft" and the published version of the IARC monograph on glyphosate (more precisely Chapter 3, the only one for which a draft is publicly available), there are several modified sections, always in the same direction: comments mentioning that the studies did not conclude to the carcinogenic nature of glyphosate were deleted and replaced by language stating that the working group had not been able to evaluate this study or presented an opposite conclusion to IARC. Examples:

Draft version

Non-significant increases in tumour incidences versus controls

- 16 were noted for skin keratoacanthoma in high-dose males, and mammary gland fibroadenoma
- 7 in low- and mid-dose females [The authors concluded that glyphosate was not carcinogenic
- 18 in Sprague Dawley rats].

Published report

Non-significant increases in tumour incidences compared with controls were noted for skin keratoacanthoma in males at the highest dose, and for fibroadenoma of the mammary gland in females at the lowest and intermediate doses. [The Working Group was unable to evaluate this

study because of the limited experimental data provided in the review article and supplemental information.]

Draft version

and the incidence of renal tubule

- 23 adenoma or carcinoma (combined) was 1/49 (2%), 0/49 (0%), 1/50 (2%), 3/50 (6%). The report
- 24 from the PWG also indicated they firmly believe and unanumously concur with the original
- 25 pathologist that the incidences of ronal tubular-cell neoplasms in this study are not compound
- 26 related The EPA (1991d) stated they did not feel that this lesion was compound solated.

Published report

and the incidence of adenoma or carcinoma (combined) of the renal tubule was 1/49 (2%), 0/49, 1/50 (2%), 3/50 (6%) [P=0.034], trend test for combined]. [The Working Group considered that this second evaluation indicated a significant increase in the incidence of rare tumours, with a dose-related trend, which could be attributed to glyphosate. Chandra & Frith

Reuters attempted to interview members of the working group about these changes. IARC did not answer any questions. Instead, IARC explained on its website that these drafts were "confidential": "Members of the IARC Monograph Working Group which evaluated glyphosate in March 2015 have expressed concern after being approached by various parties asking them to justify scientific positions in draft documents produced during the Monographs process. IARC would like to reiterate that draft versions of the Monographs are deliberative in nature and confidential. Scientists should not feel pressured to discuss their deliberations outside this particular forum."

TENTATIVE CONCLUSIONS

The pieces provided here are just **the tip of the iceberg** that emerged from a lawsuit in the United States. Full transparency of the IARC would be needed to shed light on the reasons that led IARC to adopt a glyphosate classification that contradicted all other scientific and regulatory agencies' conclusions.

It is sometimes argued that the difference between the IARC opinion and all other agencies could be due to the specific focus of IARC (IARC would consider the theoretical hazard, what one substance can do, the others the risk, what the substance actually does). In fact, all agencies are interested in both aspects. Moreover, this argument (risk vs. danger) is NEVER the IARC position in this case.

It should be determined whether the IARC's opinion on glyphosate was biased by its working method and by the composition of its working group.

As it stands, it may be suspected that anti-pesticide ideological choices have resulted in a focused choice of members of the glyphosate working group, without the conflicts of interest of some being considered detrimental to the impartiality of the group.

Considering that this case may be the biggest scandal affecting a risk assessment agency, AN OFFICIAL INVESTIGATION IN EUROPE IS INDISPENSABLE (independent of any government having already endorsed IARC's position).

Annexes

1. All risk assessment and regulatory agencies around the world have concluded that glyphosate poses no risk to applicators or consumers under normal conditions of use.

Read "What do global regulatory and research agencies conclude about the health impact of glyphosate?"

https://geneticliteracyproject.org/wp-content/uploads/2019/03/GlyphosateInfographic GLP-1.pdf

2. Ad published by a predatory lawyer firm



A similar announcement on the site of another law firm

https://www.baumhedlundlaw.com/toxic-tort-law/monsanto-roundup-lawsuit/

If you have been diagnosed with non-Hodgkin lymphoma after being exposed to Roundup weed killer and would like more information about whether you might have a potential Roundup lawsuit, please contact a personal injury attorney at Baum, Hedlund, Aristei & Goldman by filling out the contact form below.

with explicit reference to the IARC classification (here called WHO, its head organization):

In March of 2015, the World Health Organization surveyed the research on Roundup cancer links and concluded the blockbuster herbicide is "probably carcinogenic to humans." Research shows that Monsanto has known that Roundup weed killer is carcinogenic for several decades, but buried the risks as sales of Roundup continued to skyrocket in the United States and abroad.