Dr. Margaret Chan
Director General
World Health Organization
Avenue Appia 20
1211 Geneva 27, Switzerland

Brussels, 30 July 2015

Dear Dr. Chan,

I refer to my letter of May 13, 2015 and in absence of a response from WHO we would like to reiterate our industry's interest for a clarification.

The recent classifications from IARC (IARC meeting volume 112 and 113) have been misinterpreted by the media, commentators and stakeholders, many of which concluded that the new classifications constitute a real and present risk to human safety.

We urge WHO management and IARC to consider a proactive approach to clarify that the IARC classifications are reflecting a potential specific hazard and are not risk-based assessments.

It is important to understand the difference between IARC's work, which only identifies the potential hazard of a product, and the work of the world's regulatory bodies. Regulators conduct risk assessments, taking into account hazard and exposure, to ensure that crop protection products are only approved for use when shown to be safe for humans and the environment.

IARC uses limited data to identify a potential hazard, not risk, associated with an active ingredient. This is in stark contrast to the world's most robust regulatory bodies – such as the European Union and the United States – where crop protection products have undergone extensive reviews based on multi-year testing to assess risk and risk management in real world conditions.

Providing a clarification is also important given that the Monograph website and programme documents still run under the historical, but unfortunately misleading, title "IARC Monographs on the Evaluation of Carcinogenic Risks to Humans". We believe this title should be changed going forward to correctly reflect the nature of the work done by IARC, instead of giving the impression that "risk to humans" has been evaluated in the sense of a full risk assessment.

It is our view that calls for regulatory action based on IARC's hazard identification are unfounded – risk assessments carried out by the Joint FAO/WHO Meeting on Pesticide Residues (JMPR) and by major regulatory agencies around the world remain valid in the absence of any significant new information.

Human health and responsible use of crop protection products is and must always be our highest priority. As an industry we take pride in the extreme rigor by which we assess our products, our detailed submissions to regulators and the subsequent confidence this gives to crop protection product users and the public at large – we do not want to see this progress undermined.

However, without a clear statement to emphasize this, we are concerned that IARC assessments will continue to be misinterpreted and used as a political tool that can, and will,

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undermine the public's trust in agriculture and the safety of their food. This could ultimately result in a negative impact on global food security, as well as on trade.

We urge WHO management and IARC to consider a proactive approach through its press releases, website and public outreach to clarify that the IARC classifications are reflecting a potential specific hazard and are not risk-based assessments.

Our priority is to work with national regulators and international bodies, such as IARC, to ensure each and every crop protection product goes through a rigorous testing procedure and only enters the market when approved by the regulatory authorities as safe for humans for the recommended uses.

We would very much welcome the opportunity to further discuss this important issue with you and we look forward to your response.

Yours sincerely,

Howard Minigh
President and CEO, CropLife International

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