

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

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

Brussels, 13 May 2015

Dear Dr. Chan, Dr. Wild,

I write to you in my capacity as President and CEO of CropLife International with regard to the recent IARC meeting volume 112 that took place 3-10 March and found five crop protection products to be "possibly" or "probably" carcinogenic to humans.

The recent classifications from IARC 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. This request is especially pertinent with the volume 113 meeting of IARC quickly approaching on June 2-9, 2015.

We would very much welcome the opportunity to meet to discuss this with you before the next IARC meeting.

The crop protection industry, represented by CropLife International, takes the safety of its products extremely seriously. As an industry we pride ourselves on 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 who benefit from high quality, safe and affordable food.

Notwithstanding our concerns about how the classifications were reached, the recent IARC classifications have undermined our work with regulators and led to great confusion – and often misinformation – being propagated to farmers, our stakeholders, the NGO community and the general public.

Here are two examples of the media and commentator interpretation of the IARC classifications:

- The Guardian: "Roundup weed killer 'probably' causes cancer, says WHO study" (http://www.theguardian.com/environment/2015/mar/21/roundup-cancer-who-glyphosate-)
- New York Times: "Stop Making Us Guinea Pigs" (http://www.nytimes.com/2015/03/25/opinion/stop-making-us-guinea-pigs.html?\_r=0)

It is disappointing that none of these publications reflect on the important point that the classifications show a potential specific hazard rather than a risk. This has led some regulatory bodies to publically clarify the situation, for example Health Canada said:

"...IARC recently assigned a hazard classification for glyphosate as "probably carcinogenic to humans". It is important to note that a hazard classification is not a health risk assessment. The level of human exposure, which determines the actual risk, was not taken into account..."

Meanwhile other regulatory bodies, for example in Colombia, are considering a suspension of glyphosate for certain uses, citing evidence from the recent IARC classification (BBC report: http://www.bbc.com/news/world-latin-america-32677411).

We understand IARC assessments are based on the potential hazard of a substance and do not look into the dose at which it might cause an adverse effect.

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, 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. As mentioned above, this request is especially pertinent with the volume 113 meeting of IARC quickly approaching on June 2-9, 2015.

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 meet to discuss this with you before the June meeting. I look forward to your response.

Yours sincerely,

**Howard Minigh** 

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