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Congress of the United States, Ramazzini Institute and its affiliates, IARC: questions on scientific transparency

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In recent decades, there has been a growing interest in the Scientific Community (and beyond) about the possible conflicts of interest arising from either financial support to the research or extra-academic activities of the investigators, as widely debated in a recent publication (11).

The declaration of conflicts of interest represents an issue of complex interpretation which, in our opinion, should be broadened to a more comprehensive vision that would offer the reader the possibility of understanding the origin, the nature and the aims of the sponsorship supporting a specific study or research group.

A few years ago (10), we pointed out that it would be useful to declare all funding sources, both public and private, supporting the investigators, beyond the specific study, and taking advantage from funds and other resources, such as non-designated contributions from charities and staff, whose salary is covered by the institution or the government. The contribution of such additional sources may be difficult to quantify. Yet, they are essential for the conduct of the research and their importance is appreciated by the investigators. In this respect, it seems more appropriate to declare all the sources of the groups of investigators, with a possible identification of funds specifically designated for the research of interest.

We wonder how it could be possible to carry out studies or manage research groups, facilities, equipment and personnel without any apparent financial support.

These considerations are particularly relevant with respect to Institutions that have been particularly vocal in recent years in raising the matter of potential conflict of interest in a number of instances. This thought was supported by a letter about the Ramazzini Institute (RI) (1), a non-profit research association, which was sent by the Committee of Science, Space and Technology of the United States Congress to the Secretary of Health and Human Services on March 24, 2017: *“The Committee is concerned that contracts awarded to the Ramazzini Institute and its affiliates may not meet adequate scientific integrity standards. [...] Italy’s Ramazzini Institute has received at least thirteen different NIEHS contracts through four different third parties since 2009, totaling nearly \$2 million. Of the thirteen contracts, seven appear to be sole source, repre-*

senting over \$1 million taxpayer dollars. Further, media reports indicate that since 2009 NIEHS has directed as least \$92 million in grant funds to the Ramazzini Institute and its U.S. affiliate. [...] Further, since 1985 reports indicate that, in total, NIEHS has provided \$315 million in grant dollars to Ramazzini fellows. More recently, the NIEHS has refused to respond to FOIA [Freedom of Information Act, the procedure aimed at obtaining non-classified documents from US government institutions] requests seeking information related to contracts between your Department, including NIH and NIEHS, and Ramazzini. [...]

Some limited answers to this letter were provided, since a second letter (2) written by the Committee of Science, Space and Technology of the United States Congress, dated 27 September 2017, is available on the Web. Probably the documentation provided by the Department of Health and Human Services did not fulfill the requests of the Committee and raised new questions. To literally quote the document: *“the Committee is concerned about the informal nature of the agreements and contracts between NIEHS and RI [Ramazzini Institute], the lack of evidence of competition in contracting, and the unjustified continuation of the contracts for 17 years.”*

The new letter also raised issues on experimental studies conducted by Ramazzini Institute on chemicals being reviewed by the Environmental Protection Agency (EPA): *“In the case of certain chemicals and certain cancers, the EPA decided not to rely on the work of the RI at all.”* Therefore the Committee reiterated the request of full disclosure of documents related to the NIEHS contracts to Ramazzini Institute (2).

We could not find evidence of a second response by NIEHS to the Committee. However, we are sure that all the requests have been fulfilled with exhaustive answers. Therefore, we would like to know these answers: in the (unlikely) case that the NIEHS have not yet provided any answer, concerns remain on the mechanisms by which NIEHS funded research at Ramazzini Institute.

The letters of the Congress Committee show that the lack of transparency and accountability may affect those institutions and individuals often claiming for the same principles.

A further example refers to the recent controversy on the IARC evaluation regarding the herbicide glyphosate, matter already extensively debated by Robert Tarone (12). A relevant number of members of the Collegium Ramazzini (CR), an international Academy that cooperates with the RI and whose General Secretariat is based in Bentivoglio (Italy), signed a letter (7) written by Christopher Portier (himself a CR member) to Wytenis Andriukaitis, the Commissioner of Health & Food Safety, to defend the IARC evaluation. A series of letters (3-5) were sent by the same US Congress Committee to the Directors of the International Agency for Research on Cancer- IARC (initially chaired by Dr. C. Wild, then Dr. E. Weiderpass) on the integrity of the Monographs program. We propose extracts from the letter of June 2018 (5) which summarize the heart of the matter:

“The Monograph Programme has been a recipient of significant criticism from a wide range of individuals and establishments, including scientists, judges, and Members of the U.S. Congress. [...] In its most recent oversight, the Committee has discovered that serious flaws existed in the glyphosate Monograph study and that despite these issues, Monograph participants used the study to influence policy-makers in both Europe and the United States. [...] According to reports by Reuters, the IARC Working Group for the glyphosate Monograph ignored studies and data that contradicted its seemingly pre-determined conclusion were omitted or altered. [...] Besides issues concerning the lack scientific integrity and transparency, the Committee has found alarming instances of conflicts of interests, particularly with Christopher Portier. In 2014, Portier chaired the IARC Working Group that proposed an assessment on glyphosate.

During this time, Portier was also a private litigation consultant on a separate matter for the same law firm that went on to sue on the glyphosate issue. Simultaneously, Portier was working as a senior scientist for the Environmental Defense Fund (EDF). In fact, Portier’s work for EDF included promoting a waistband that exposes the hazards of chemicals and pesticides.

In 2015, Portier assumed a role as an Invited Specialist on the glyphosate assessment, while still maintaining his ties with EDF. Despite these conflicts of interest, he still influenced the interpretation of the glyphosate assessment, in direct violation of Monograph’s stated rules. Finally, less than two weeks after the glyphosate assessment went public, Portier joined the same law firm mentioned above, but this time as a litigation consultant against glyphosate.

After the Committee wrote Dr. Wild on these issues, he responded that in Portier’s position as an Invited Specialist, he did not ‘draft text that pertains to the description or interpretation of cancer data, or participate in the evaluation’. However, documents obtained by the Committee revealed that Portier did in fact influence the interpretation of the glyphosate Monograph. Portier discussed the Monograph with the Working Group authors, he developed responses to EFSA’s glyphosate assessment, and he spearheaded a letter sent to the European Commission on Health and Food Safety on the glyphosate Monograph. Dr. Wild refused to ac-

knowledge any issues with the Monograph Programme despite the evidence presented by the Committee that called into question the science and integrity of the agency.”

The debate about the carcinogenicity of glyphosate is a matter of great interest: in April 2019, EPA released the Glyphosate Proposed Interim Decision for public comment (9), stressing that glyphosate is not a carcinogenic agent to humans.

Many other Organizations such as the World Health Organization (WHO) and the Food and Agriculture Organization (FAO) (8), the European Chemical Agency (ECHA) and the European Food Safety Authority (EFSA) (6), do not agree with IARC position, raising further doubts about a possible lack of scientific transparency.

The content of the debate is so relevant that it cannot be ignored and we hope that each aspect could be clarified to the Scientific Community.

Disclosure Statement

E.P. has acted as Court-appointed expert witness and as consultant to parties in asbestos litigations.

M.L.D.P., M.D., A.G., D.L. declare no conflict of interests.

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