

Message

From: Goutman, Thomas [Goutmant@whiteandwilliams.com]
Sent: 10/3/2012 8:00:19 PM
To: ZUCKER, MARTIN P [AG/1000] [martin.p.zucker@monsanto.com]; 'Kaley, Robert' [Robert.Kaley@huschblackwell.com]; 'Miller, Adam' [Adam.Miller@huschblackwell.com]
Subject: RE: John Schell and IARC

[REDACTED]

-----Original Message-----

From: ZUCKER, MARTIN P (AG/1000) [martin.p.zucker@monsanto.com]
Sent: Wednesday, October 03, 2012 03:56 PM Eastern Standard Time
To: Kaley, Robert; Miller, Adam; Goutman, Thomas
Subject: FW: John Schell and IARC

[REDACTED]

From: Bumb, Cathleen S [mailto:csbumb@solutia.com]
Sent: Wednesday, October 03, 2012 2:48 PM
To: ZUCKER, MARTIN P [AG/1000]; Nassif, Joseph
Subject: FW: John Schell and IARC

[REDACTED]

From: Macolly, E Gayle
Sent: Wednesday, October 03, 2012 2:32 PM
To: Bumb, Cathleen S
Subject: John Schell and IARC

John Schell has requested that we nominate him to be an observer at the upcoming meeting to discuss the new assessment of PCBs by the International Agency for Research on Cancer (Monograph 107). They are up to mischief again and are trying to get individual congeners classified as human carcinogens (including non-dioxin like ones) – further requiring individual congener analysis in order to do a risk assessment. IARC doesn't have any authority in the US, but whatever they do, EPA follows in short order.

Hi Cathy,

IARC (International Agency on Cancer Research) is sort of the EU's scientific body, equivalent to our National Institutes of Health. The objective of the IARC is to "promote international collaboration in cancer research." They have over 300 people working there and the main output is their Monographs.

IARC Monographs – IARC identifies, through a nomination process, environmental factors (chemicals, viruses, noise, even "working night shift") that need to be evaluated as to their potential to cause cancer in

humans. The Monograph is the summary report of the expert panel that contains IARC's determination as to the cancer classification of that particular factor. As noted on their web page "The *Monographs* are used by national and international authorities to make risk assessments, formulate decisions concerning preventive measures, provide effective cancer control programs and decide among alternative options for public health decisions."

The Monograph is sort of like EPA's IRIS assessment that is pending. The classification by IARC doesn't carry any regulatory weight in the US (although it does in toxic tort cases), but if a chemical is classified by IARC and hasn't been by EPA, it will be in short order. What's significant about the new monograph is that it likely will evaluate the carcinogenicity of PCBs on a congener-specific basis (as opposed to total PCBs or Aroclor mixtures); EPA has already implied they are going to go in that direction as well. From a practical standpoint, that will translate into more and more congener-specific data and potentially change the way remediation decisions are made. Until the Working Group convenes and we get a sense of where they are headed with their evaluation, it's hard to predict how they might decide on what goes into the Monograph.

Here's a link to the meeting information: <http://monographs.iarc.fr/ENG/Meetings/vol107-request.php>.

As mentioned before, IARC really doesn't have any direct influence on EPA (or how we do risk assessments), but whatever they decide about PCBs, EPA will follow in short order. The importance of getting an observer there is that the deliberations are not public and they don't publish anything except the Monograph after the consultation, but the discussions by the Committee are often very revealing and informative. John was an observer once before and only by attending the meeting did he know that only 1 scientist was pushing a particular agenda and the organization he represented used the information to delay a particular regulation in the EU that was going to be very costly. We don't know who the experts are on the panel that will write the monograph (IARC won't release the names until December), but if precedence is any indicator it will not be particularly balanced.

John Schell is requesting a nomination not funding. He will have a better chance of being selected as an observer if he is nominated by someone other than himself. The nomination period ends October 12th. Do you have any issues if I nominate John to be an observer?

Take care,
Gayle

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