

**Roger McClellan**

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**From:** Roger McClellan <roger.o.mcclellan@att.net>  
**Sent:** Tuesday, June 5, 2018 12:36 PM  
**To:** Charles Whalley  
**Cc:** Roger McClellan; Mildred B. Morgan  
**Subject:** Response to your June 1, 2018 Memo

Charles,

Thanks for acknowledging receipt of my memo dated May 31, 2018, entitled “Context for Decision-Making on Papers published in Special Supplemental Issue of Potential Carcinogenic Hazard of Glyphosate” and the attachments. Let me briefly comment on your response memo of June 1, 2018.

Your positive comment on “how seriously you take matters like this” was greatly appreciated. My basic nature throughout my life and professional career has been, and remains, to be serious in critically analyzing situations and in making decisions. I might add that I expect the same of others. I view all the decisions I make as Editor of Critical Reviews in Toxicology (CRT) as serious matters. The decisions that must be made around the five papers in the special supplement are probably the most contentious in my decades of service as Editor of CRT.

Your memo identified a specific case from COPE’ s archives as representing a precedent setting case. Did you or someone else select the case? In my professional opinion, whoever selected the case very likely does not have an in-depth understanding of the issues surrounding publication of the five Glyphosate papers. They certainly had not read my memo on “context.” Let me explain.

(1) The author of the drug review did not reveal he had been a paid consultant to the company producing the drug. This is a central issue in the case. In contract in the Glyphosate case, the fact that the critical review of the potential carcinogenic hazard of Glyphosate was being paid for by Monsanto Corporation, the company that originally discovered and marketed Glyphosate, was made known to me, the Editor of CRT, in my earliest conversations concerning the potential publication of the five papers. The prior employment and consulting relationships of key participants in the prospective review were also known to me.

(2) In my initial conversation with you concerning the potential for publishing the special supplement, I am confident I made known to you the role of Monsanto in paying for the conduct of the critical review and preparation of the multiple papers. It was very clear Monsanto would be paying directly, or through a third party, for publication of the special supplemental issue.

(3) Since its inception, I have followed the activities of the International Agency for Research on Cancer (IARC). Thus, I was aware for several years that IARC would be reviewing the carcinogenic hazard of Glyphosate. I was also aware that Monsanto would have a vested interest in the outcome of the IARC review.

(4) After I learned that a Panel of independent experts would be assembled to critique the IARC decision that "Glyphosate was a probable human carcinogen," with financial support from Monsanto, I made it known to Monsanto representatives that CRT would be pleased to publish the Panel's critique. I made clear that acceptance of the papers would be conditioned on the papers undergoing critical review and revision. Further, I made it known that rather than having the critique published in a single paper, I would recommend preparing several linked papers that would parallel the IARC review process. I also noted that use of a multi-author approach would allow clear recognition of the individuals carrying out various portions of the critique. My response to the inquiry on this matter was no different than that I regularly give to many individuals concerning prospective papers. CRT is in the business of publishing critical reviews! CRT competes with other journals to receive high-quality reviews on topics of global interest!

(5) When the review papers were completed and submitted, I became aware of the names and affiliations of all of the authors. This immediately confirmed, as I expected, that two individual authors, Drs. John Acquavella and Larry Kier, were previously full-time employees of Monsanto. This confirmed what I already knew. Indeed, Dr. Kier had published an earlier paper in CRT on Glyphosate, a paper prepared as a consultant to Monsanto post-employment by Monsanto. I was also confident that the peer members of the Glyphosate Panel whose work was funded by Monsanto were aware of the past and current funding status of Drs. Kier and Acquavella.

(6) As soon as I read the five papers and the summary conclusions that were counter to those reached by IARC, I anticipated that IARC would be very unhappy with the results of the Monsanto sponsored critique. I also speculated that various other parties, and especially those opposed to licensing and regulatory approval of Glyphosate for continued use, would be unhappy with the results presented in the Panel's papers. Further, I recognized that various parties representing plaintiffs alleging health effects attributable to Glyphosate exposure were also going to be displeased with the Panel's papers and conclusions. However, I recognize my role as Editor is to not select "Winners and Losers;" it is to publish papers of high-scientific quality.

(7) My approach to the anticipated controversy was to make certain the five papers were subjected to as rigorous an external review as that given any paper published in CRT. This was accomplished by engaging, without compensation, 27 experts from around the world who provided 36 sets of review comments. Several members of the CRT Editor's Advisory Board reviewed all five papers. Recall the drug review paper you sent and proposed as setting precedent was reviewed by two individuals!

(8) I have carefully reviewed the COPE documentation on the drug review paper your memo advances as a precedent for action on the five Glyphosate papers. I respectfully disagree that this paper serving in any way to set precedent for the handling of the five Glyphosate papers.

(9) In my professional opinion, the five Glyphosate papers are scholarly pieces of work clearly documenting the process used to critique the IARC report and provide an alternative hazard characterization. The statements of the 16 individual authors testify to the independence of their work. The independent process used in preparing the critique is clearly captured in the statement of Sir Colin Berry quoted in my context memo. The five papers are scientifically sound.

(10) Review of the alleged precedent only serves to strengthen my conviction that it would be a breach of scientific ethics and my own standards of scientific integrity to agree to retraction of any or all of the Glyphosate papers published in the special supplemental issue of CRT. I agree that certain aspects of the process by which the five papers were prepared and published could have been improved, especially documentation. I do recommend publishing "Revised Acknowledgments and Revised Declarations of Interest Statements" for all five papers.

(11) Beyond bringing actions on the five Glyphosate papers to closure, it is critically important that a rigorous review be initiated of the Taylor and Francis process for preparation and submission of papers, especially when the journal, such as CRT, uses a "Declaration of Interest." The current on-line documentation is out of date. In part, this situation has developed as CRT has put in place much more rigorous processes to minimize perceived and real conflicts of interest than used by most Taylor and Francis journals.

Respectfully,

Roger