

EXHIBIT 46
WIT: McClellan
DATE: 2/6/19
D. Srebrenick, CRR, CLR

Roger McClellan

From: Burns, Michele <[REDACTED]@childrens.harvard.edu>
Sent: Friday, September 22, 2017 2:32 PM
To: Roger McClellan
Cc: Mildred B. Morgan; Charles Whalley
Subject: RE: Fw: GLYPHOSATE SPECIAL ISSUE -- CONFIDENTIAL [EXTERNAL]

Thank you.

From: Roger McClellan [mailto:roger.o.mcclellan@[REDACTED]]
Sent: Friday, September 22, 2017 2:42 PM
To: Burns, Michele
Cc: Mildred B. Morgan; Charles Whalley
Subject: Fw: Fw: GLYPHOSATE SPECIAL ISSUE -- CONFIDENTIAL [EXTERNAL]

Michele:

I have now retrieved the e-mail you sent me on September 16th. It is helpful. Best regards, Roger

On Thursday, September 21, 2017 12:44 PM, David Garabrant <dhg3@[REDACTED]> wrote:

Roger,

Yes, I will provide a response by tomorrow. I knew you meant September 15.

Best wishes.

David H. Garabrant, MD, MPH

[REDACTED]

Ann Arbor, MI

e-mail: dhg3@[REDACTED]

phone [REDACTED]

www.epidstat.com

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On September 21, 2017 at 2:40 PM Roger McClellan <roger.o.mcclellan@[REDACTED]> wrote:

David:

I apologize for the error in the attached memo, it should be September 15th not April 15th. Please acknowledge receipt and indicate if you can provide response by tomorrow. Thanks for your assistance.

Roger

On Wednesday, September 20, 2017 2:05 PM, Roger McClellan <roger.o.mcclellan@[REDACTED]> wrote:

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Diplomate-ABT and ABVT
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September 20, 2017

TO: Ashley Roberts et al.
FROM: Roger O. McClellan
SUBJECT: **Glyphosate Special Issue – CONFIDENTIAL**

Attached is a copy of the memo I sent you on April 15, 2017 concerning the Special Issue of Critical Reviews in Toxicology that contained 5 papers you authored or co-authored. I am pleased to note that many of you have responded. The purpose of this memo is to ask those of you who have not responded to provide me a response with a copy to Charles Whalley, Taylor and Francis, at your earliest convenience. It is important that each of you respond, not just the corresponding or first author or each paper. Your individual responses are critical to our completing our investigation of this matter in a timely manner. If you have any questions please feel free to contact me. Thank you for your assistance.

If you are not able to respond by Friday, September 22, 2017, please acknowledge receipt of this memo and let me know when I can expect your response.

Attachment: Letter of April 15, 2017

Cc: Charles Whalley ([REDACTED]@tandf.co.uk)
Mildred Morgan ([REDACTED]@hargray.com)

Roger McClellan

From: Roger McClellan <roger.o.mcclellan@[REDACTED]>
Sent: Friday, September 22, 2017 9:43 PM
To: Forrest Mann; ldkier@[REDACTED]
Cc: Mildred B. Morgan; Roger McClellan; Ashley Roberts Intertek
Subject: Re: Glyogisae Papers Published in CRT

Larry:

Thanks. Your message has been received. I appreciate your efforts.
Best wishes to your wife for a speedy recovery. Roger

On Friday, September 22, 2017 6:57 PM, Forrest Mann <Foreman48@[REDACTED]> wrote:

Roger,

This email response to you has bounced twice when sent from my q.com (address unknown) so I'm forwarding from my other account.

Thanks.

Larry Kier

From: Larry Kier <ldkier@[REDACTED]>
Sent: Friday, September 22, 2017 7:50 PM
To: foreman48@hotmail.com
Subject: FW: Glyogisae Papers Published in CRT

From: Larry Kier [mailto:ldkier@[REDACTED]]
Sent: Friday, September 22, 2017 5:37 PM
To: 'Roger McClellan'; 'gary_williams@nymc[REDACTED]'; 'mjaardema@[REDACTED]'; 'acquajohn@[REDACTED]'; '@sircolinberry.co.uk'; 'brusick41@aol.com'; 'Michele.Burns@childrens.harvard[REDACTED]'; 'jdecam@uol.com[REDACTED]'; 'dhg3@[REDACTED]'; 'helmut.greim@lrz.tum[REDACTED]'; 'root@genetoxconsulting[REDACTED]'; 'gmarsh911@[REDACTED]'; 'ksolomon@uoguelph[REDACTED]'; 'T.M.Sorahan@bham.ac.uk'; 'ashley.roberts@[REDACTED]'; 'douglaslweed@[REDACTED]'; 'Charles Whalley'; 'Roger O. Mcclellan'; 'Mildred B. Morgan'
Subject: RE: Glyogisae Papers Published in CRT

Dear Dr. McClellan:

Thank you for your communication providing the opportunity to respond to concerns.

With respect to the specific question of authorship I fully concur with my fellow authors that the genotoxicity expert panel report was the product of the listed authors. Neither Monsanto employees nor attorneys were "ghost-writers."

I was initially hired by Monsanto to serve as a consultant to support the Intertek genotoxicity expert panel. In this capacity I was in contact with Monsanto to facilitate providing the panel members with complete and accurate information, including supplemental information on regulatory genetic toxicology studies.

Subsequent to development of the genotoxicity expert panel manuscript I agreed to be added as a co-author subject to the approval of the panel members.

Please note that my employment with Monsanto began in 1974 and not 1979.

Thanks.

Larry Kier

From: Roger McClellan [mailto:roger.o.mcclellan@██████████]
Sent: Friday, September 15, 2017 3:37 PM
To: gary_williams@nymu██████████; mjaardema@██████████; acquaajohn@██████████@sircolinberry.co.uk; brusick41@██████████; Michele.Burns@childrens.harvard██████████; jdecam@uol.com██████████; dhg3@██████████; helmut.greim@lrz.tum██████████; ldkier@██████████; root@genetoxconsulting██████████; gmarsh911@██████████; ksolomon@uoguelph██████████; T.M.Sorahan@bham██████████; ashley.roberts@██████████; douglasweed@██████████
Cc: Charles Whalley; Roger O. Mcclellan; Mildred B. Morgan
Subject: Glycissae Papers Published in CRT

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September 15, 2017

Dear Dr Roberts, authors and co-authors of Review Papers:

This e-mail is being sent to you in view of your role in the preparation of five papers that were published on line in a Special Supplemental Issue of Critical Reviews in Toxicology entitled, "An Independent Review of the Carcinogenic Potential of Glyphosate," Volume 46, 2016. The five papers and an Introductory Article prepared by me as Editor of Critical Reviews in Toxicology are available electronically at <http://tandfonline.com/toc/itxc20/46/sup1>.

It was known by me and Taylor and Francis, the publisher of CRT, from the earliest communications on the supplemental issue that the review of glyphosate and preparation of the papers was sponsored financially by the Monsanto Company, a producer of glyphosate. It was fully anticipated that the specific role of Monsanto would be related in the Declaration of Interest for each article, and that the authorship attributed to each

article would reflect all contributions made. The need for a Declaration of Interest (DOI) is clearly spelled out in the Instructions for Authors at http://tandfonline.com/action/authorSubmission?journalCode=itxc20&page=instructions#Disclosure_statement. Moreover, I gave explicit instructions on multiple occasions on the need for each article to have an accurate, comprehensive and transparent DOI.

On submission, you confirmed that the authorship attributions, any declarations of funding and any DOIs were accurate and complete in the journal's peer review system. On publication, you made warranties in the Author Publishing Agreements again confirming this, and that you had understood and complied with the journal's ethical policies. You will understand that compliance with the journal and Taylor & Francis' policies here, which are in line with COPE and ICMJE guidelines, is paramount for maintaining the integrity of our published research.

Recently, as part of legal proceedings in California both internal and external communications by Monsanto personnel have been made public. These communications have been reported upon in Bloomberg Businessweek and the New York Times as well as elsewhere. The documents released raise serious questions as to whether the warranties made for all articles in the supplement were accurate. Specifically, the documents suggest that employees of Monsanto were involved in the drafting of articles in the supplement without being acknowledged as authors, and that the relationship between some authors on the supplement and Monsanto was not fully described in the DOIs. Overall, the documents suggest that the warranties made and DOIs provided with these articles do not accurately reflect the extent of Monsanto's involvement in their preparation.

This issue is sufficiently serious that Taylor and Francis, as the Publisher, with my assistance as Editor, have initiated an investigation. To assist in this investigation, at this stage I ask you to comment on the questions raised. Specifically, I would be grateful for your explanation as to the extent of any contributions to the drafting of articles in the supplement from authors not currently listed as authors and the accuracy of all Declarations of Interest. I ask that you respond by September 22nd.

I am CCing Charles Whalley, Managing Editor at Taylor & Francis, in this e-mail. I hope to receive a response from you soon.

Regards,

Roger O. McClellan
Editor, CRT