



INTERNATIONAL NETWORK FOR EPIDEMIOLOGY IN POLICY

INTEGRITY, EQUITY, AND EVIDENCE IN POLICIES IMPACTING HEALTH

To: UN Special Rapporteur on Toxics and Human Rights
From: Executive Committee, [International Network for Epidemiology in Policy](#) (INEP)
Re: Request for Inputs, upcoming thematic report on the right to benefit from scientific progress and its applications (Right to Science Report)
Date: 15 March 2021
Contact: [Kathryn Gwiazdon](#), Secretary, INEP Executive Committee

The International Network for Epidemiology in Policy (INEP) operates at the interface of health research and policy. Among other things, it recognizes and highlights the misuse of population data and potential corruption of the epidemiology. INEP is the only umbrella body of this type, currently comprising 24 national and international voluntary professional member organizations.

INEP recently published a Position Statement, [Conflict-of-Interest and Disclosure in Epidemiology](#), with lead author [Colin Soskolne](#) (PDF attached). The INEP Position Statement is a compendium exposing the breadth and sophistication of malevolent forces that derail science to negatively impact public policy. It consists of a 2-page Executive Summary, a 3-page Table of Contents, 8 pages of Front Matter, 30 pages of Substantive Text, and 52 pages of Appendices that serve as exemplars of instruments developed to manage the problem of Conflict-of-Interest (COI). After a review of the scientific literature, our main findings include:

- Recent high-profile cases exemplifying the misuse of epidemiological research and the failure to disclose COI reported in the media and scientific literature.
- Recent COI examples developed by INEP co-authors and contributors.
- A compendium of common practices used to distort and misapply epidemiological sciences.
- INEP recommendations that include guidance and strategies for COI management by: Identification, Avoidance, Disclosure, and Recusal.

In terms of what you are seeking, the INEP document:

- identifies misinformation and disinformation campaigns and documents attempts to manipulate or distort science in regulatory processes;
- Promotes transparency, accessibility, diffusion of science and scientific evidence, innovations, and scientific education;
- Provides examples of best practice by governmental entities and business enterprises for promoting or hindering scientific progress or the wide availability of results of scientific work; and
- Offers mechanisms and safeguards to prevent and address conflict-of-interest in the production of science, the functioning of science-policy interface platforms, and the operation of regulatory systems for the protection of human health and the environment.

The main recommendation is to facilitate mechanisms for: (a) Identification; (b) Avoidance; (c) Disclosure; and (d) Recusal.

As part of the public outreach and disbursement of the document, we respectfully provide it to you as input, thus engaging with your mandate as you prepare to present your first thematic report to the 48th session of the Human Rights Council in September 2021 on the "Right to Science". Because the INEP document is

directly on topic, we hope that it will prove of value in your report. The Executive Summary is extracted below to give you a sense of the scope of the document:

EXECUTIVE SUMMARY

Science can be misused either intentionally, through error, or from bias. For instance, distortion and disinformation practices regarding scientific methods and evidence were intentionally employed by the lead industry in the early 1900s, and since the 1950s, by the tobacco industry. The International Network for Epidemiology in Policy (INEP) focus in this Position Statement is on Conflict-of-Interest (COI) because it has been associated with the misuse of epidemiological science. Practices associated with COI have been adopted by a range of entities including businesses, agencies, academic institutions, and nonprofit organizations. In particular, COI is observed across a range of industries where self-interest includes financial stakes, liability protection, political interests, and other motivations.

COI is typically created in the scientific community by confidential financial incentives, the award of scientific grants and contracts, or by promises of job security. Rather than conducting impartial analysis, scientists in a COI situation may produce and disseminate misinformation and suppress data so that the association of cause-and-effect is obscured and denied. In addition to individual researchers, COI can similarly affect scientific journal authors, reviewers, editors, and involve corporate sponsors of journals. The effects of COI can include the undermining of scientific integrity, the erosion of public trust in the science of epidemiology, and harm to workers, the public, and the environment.

INEP is well-positioned internationally to develop strategies to combat the misuse of epidemiological science. INEP is the only global network of epidemiologists with a focus on providing a bridge between epidemiological research and evidence-based, rational, and government-formulated health policy that serves the public interest. It provides a unique global forum to protect and promote public health and works to ensure scientific integrity, promote ethical conduct in research, and support evidence-based research findings that are both independent and transparent.

The misuse of epidemiological science that is associated with COI has been successful and thus continues to grow to the detriment of public health. This Position Statement provides high profile examples on the misuse of epidemiological research and the failure to disclose COIs that have been reported in the media and scientific literature; also included are recent examples developed by INEP co-authors and contributors. Identification and disclosure of misuse are fundamental to the protection of both scientific integrity and the public's health. Accordingly, there is an expanded need for professional organizations to adopt, update, and monitor COI disclosure protocols and scientific practices for their members, and to lead in providing training to young scientists so that they can recognize and avoid COI. In addition, the common practices to distort and misapply epidemiological science should be recognized and called out when they occur.

Information published between 2004 and 2020 has been collected, analyzed and presented in this INEP Position Statement and in its attached appendices.* Along with a background section on COI, the Position Statement includes examples of COI identification/disclosure failure, specific tactics used to distort epidemiological science, and INEP recommendations. These recommendations include guidance and strategies for COI management by identification, avoidance, disclosure, and recusal. INEP's goal is to have this Position Statement adopted and its recommendations applied by its member organizations, academic institutions, and other public health professionals, as well as epidemiologists, so that scientists can better ensure that they fulfil their roles both in informing and protecting the public's health.

*Appendices include a compendium of disclosure tools for all major steps in the research process: (a) formulation of the research question, (b) research proposal development, (c) data collection, measurement, analyses, and interpretation, (d) peer-review, and (e) dissemination/publication and communication. Appendices also include examples of COI issues associated with service on boards and advisory committees that direct research and its application in protecting the public's health.

The INEP Position Statement recognizes the integrity of scientific processes as a precondition to the pursuit of truth in the public interest. It provides recent examples of the assault by disinformation campaigns that intentionally spread false information, or deliberately seed uncertainty where there is consensus. It reveals how the science-policy interface is compromised where there are conflicting interests.

We would hope that the INEP document is helpful as you focus your report on the interface between information, science, and hazardous substances and wastes. Some of the 12 examples of assaults on science and scientists that the INEP document exposes may help you in laying out government duties and business responsibilities in respect of the right to benefit from scientific progress and its applications. This said, we believe that the INEP Position Statement is consistent with your call for input in addressing how science is undermined by special interests.

The science-policy interface deeply affects the human rights implications of toxics and the environmentally sound management and disposal of hazardous substances and wastes. The lack of definition as to the nature of uncertainty in the field of exposure to toxic substances, the frequently occurring gaps between scientific evidence and decision-making, attempts at distorting scientific data by public and private actors, are all contributing factors to the divide between policy-makers and scientists. Science-policy interface platforms in recent years are increasingly employed as means for overcoming the gaps between the realms of scientific research and of elaborating and implementing policies. In simpler terms, they are designed to facilitate the provision of scientific evidence to policymakers.

The right to information and scientific evidence, freedom of expression, as well as credibility, independence and transparency, are key elements of success in order to promote the Science-Policy Interface and to fully guarantee to everyone the right to science. The private sector also has a key role to play in promoting this right and existing science-policy platforms in chemicals and waste, as well as in protecting against inappropriate corporate influence and conflicting interests. Digital tools are becoming increasingly important for maximizing the impact of science-policy interface platforms. In order to enable this right, States and businesses need to cooperate to tackle misinformation, enable equal access to adequate and impartial information and scientific evidence, and promote innovations.

Please contact us for anything at all. We remain at your disposal.