Applicability of Data Quality Act to Foreign Institutions

Although the DQA does not apply to foreign regulatory bodies it does say that any study produced by such a group that fails to meet the requirements of the Data Quality Act cannot be used in the US and such an action often changes the nature of the debate in foreign jurisdictions as well as the US. Here are some prominent success stories.

World Health Organization

- This issue involved the food pyramid published each year in the United States based upon the recommendations of the WHO. The WHO prepared a report and was ready to transmit it to the US but it contained faulty statements regarding one constituent.

- CRE filed a Data Quality Alert stating that if WHO did not make the designated changes in Alert the HHS could not use the WHO report in constructing the food pyramid.

- Subsequent to CRE filing the Alert the HHS advised WHO that it would not publish the WHO publication unless it made the requested change; WHO complied with the HHS determination.

Background Information

The following reports were written by nationally credentialed news organizations:

- CRE Alert and Press Coverage
- HHS Response
International Whaling Commission

❖ The IWC issued a report which concluded that seismic exploration activities caused the stranding of marine mammals in Brazil. The IWC report was supposedly based on study prepared by an organization in Brazil. The United States is a member of the IWC.

❖ CRE reviewed the report and demonstrated that the IWC misstated the conclusions of the Brazilian report. CRE advised the US representative to the IWC that its report was not DQA compliant and provided a copy of the resulting *Data Quality Alert* to US authorities.

❖ Upon receiving the *DQA Alert* the US representative to the IWC promptly advised the IWC of errors in the report and the report was so modified.

Background Information

➢ [CRE DQA Alert to the IWC](#)

➢ [IWC Response to CRE Brazil](#)

International Agency for Research on Cancer

❖ IARC examined the link between the use of talcum powder and cancer and concluded:”Evidence for carcinogenicity to humans (*inadequate* for talc not containing asbestiform fibres; *sufficient* for talc containing asbestiform fibres)”

❖ The aforementioned decision by IARC was considered by many observers as not supported by the data presently before the agency. The ramifications for the talc industry were substantial.
Accordingly, the National Toxicology Program announced its decision to review talc. At the same time CRE became an active participant in the NTP review of the program. When CRE entered the foray two NTP work groups had concluded that talc, in the absence of asbestos, talc is reasonably anticipated" to cause cancer in humans.

CRE performed an in-depth review of the matter and issued this report. The aforementioned letter was followed by arduous process which ended with NTP declaring there was insufficient information to make a decision.

A recent report written many years after the CRE letter by the Los Angeles Times substantiated CRE conclusions.