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In reply please  
refer to:

Your reference:

The Honourable Katherine Clark  
Member of Congress  
2448 Rayburn Office Building  
Washington, DC 20515  
Etats-Unis d'Amérique

19 June 2019

Dear Representative Clark,

I have the honour to respond to your letter dated 22 May 2019, in which you make reference to a report recently released by yourself and Representative Hal Rogers regarding Purdue Pharma and to the letter dated 3 May 2017 addressed to my predecessor Dr Margaret Chan by Honourable Members of Congress. I appreciate the time that your staff spent meeting with two of my Assistant Directors-General, Dr Mariângela Simão and Mr Stewart Simonson to discuss the concerns raised in the letter dated 22 May 2019.

The World Health Organization (WHO) takes very seriously the concerns raised with regard to the perceived conflicts of interest of experts involved in the development of WHO's 2011 guidance "*Ensuring balance in national policies on controlled substances: Guidance for availability and accessibility of controlled medicines*" and the 2012 "*Guidelines on the pharmacological treatment of persisting pain in children with medical illnesses*".

Impartiality and transparency are core principles of our normative work, and WHO has continually strengthened its processes to ensure these principles are adhered to in the work of the Organization. By way of example, WHO requires its experts to disclose potential conflicts of interest, including those of a financial, academic, or personal nature. WHO analyzes such disclosures to determine if experts have conflicts that could affect the impartiality of the overall process. Where a conflict is deemed significant, relevant mitigation measures, such as public disclosure of the conflict are applied.

ENCL: (1)

cc: The Director, Office of Global Health Affairs, Department of Health and Human Services, Washington, D.C.  
The Secretary of State, Attention: IO/T, Department of State, Washington, D.C.  
Permanent Mission of the United States of America to the United Nations Office and other International Organizations at Geneva

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Specifically, WHO regularly reviews and updates these processes with a view to have them reflect best practices, which evolve over time. For instance, in 2014 WHO promulgated its Guidelines for Declaration of Interest (WHO Experts) and updated the second edition of its Handbook for Guideline Development. Since 2015, biographies of experts invited to participate in a guideline development process are also published on WHO's website and public comment is invited. If objections are raised, the WHO Office of Compliance, Risk Management and Ethics, together with the WHO technical unit concerned, analyze the objections to determine if there is a relevant conflict.

The aforementioned 2011 guidance and 2012 guidelines on pain management were developed prior to the implementation of the updated conflict of interest processes.

WHO is discontinuing these guidelines in the light of new scientific evidence that has emerged since the time of their publication. This will also address any issues of conflicts of interest of the experts that have been raised. The enclosed statement will be posted on the WHO website and at the time the guidelines are discontinued. This statement will also be published in *The Bulletin of the World Health Organization*.

WHO is concerned about people suffering severe pain without access to effective pain relief medication. Reports indicate that there is very low access to medication for moderate and severe pain, particularly in low- and middle-income countries. In addition, differences between acute and chronic pain need to be understood and managed accordingly. Recent research in the fields of palliative care and pain management has identified many strategies for managing pain, beyond drug treatment alone.

Evaluating this new evidence and establishing the best strategies for alleviating pain—both acute and chronic—is an important area of work for WHO. In this regard, WHO has already initiated the process for reviewing and updating its guidelines and policy documents regarding pain management and, in January 2019, published the new “*WHO Guidelines for the pharmacological and radiotherapeutic management of cancer pain in adults and adolescents*”, available at <https://www.who.int/ncds/management/palliative-care/cancer-pain-guidelines/en/>. Further work to produce guidance for management of pain in different age groups is planned, including the review of guidance for children.

Regarding your letter of 3 May 2017, the files from that time indicate that my predecessor signed a response dated 17 May 2017. I understand that you have not received this letter. A copy of that document is enclosed for your records.

A similar letter has been sent to Representative Hal Rogers.

Yours faithfully,



Dr Tedros Adhanom Ghebreyesus  
Director-General