

COMMITTEE ON CARCINOGENICITY OF CHEMICALS IN FOOD, CONSUMER PRODUCTS AND THE ENVIRONMENT

COC case for change – submissions to November 2025

1. In July 2025, COC published its guidance statement [A case for change: the challenge to develop a better approach to assessing risk of cancer caused by chemicals](#). This statement invited submissions to be made with proposals for different scientifically robust approaches to assessing cancer risks to humans from chemicals, or to present cases studies where alternative methodology has been used to select candidate compounds before full regulatory testing.
2. Two sets of submissions have been submitted to the COC Secretariat, and these are attached in Annex A.
3. The Secretariat proposes to take comments only from the COC at this stage and await further submissions before progressing further work on this topic. Further consideration of dissemination is also required.

Questions for the Committee

4. The Committee is invited to consider the approaches in Annex A, and whether they have any comments on these at this time.

Secretariat
November 2025

This is a background paper for discussion.
It does not reflect the views of the Committee and should not be cited.

CC/2025/09 Annex A

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Submissions received to the COC Secretariat on the Case for Change.

These documents are attached for Members. They are not being made publicly available at this stage as some include pre-publication results.

**Secretariat
November 2025**