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Dr. Lori White
Designated Federal Officer for the BSC
Office of Liaison, Policy and Review Division of NTP, NIEHS
P.O. Box 1223, K2-03
Research Triangle Park, NC 27709
whiteld@niehs.nih.gov

Re: NTP Approach for Systematic Review and Evidence
Integration for Literature-based Health Assessments

Dear Dr. White:

The General Electric Company (GE) joins the American Chemistry Council (ACC) and the International Institute of Synthetic Rubber Producers, Inc. in requesting that the National Toxicology Program (NTP) “embrace and fully adhere to” the principles set forth in President Obama’s Memorandum on Transparency and Open Government (January 21, 2009),¹ and incorporated into the Department of Health and Human Services’ (HHS) Open Government² and Strategic Plans.³ As stated in HHS’ Open Government Plan:

Transparency, collaboration, and participation are the key principles of Open Government. By sharing our data with the American people, we are creating new opportunities to develop products and services that can improve health and health care; *by creating mechanisms for the public to contribute their ideas and share in the co-creation of solutions, we can harness the energy and expertise both inside and outside the government to achieve our goals.*^[4] [Emphasis added.]

To implement the principles of transparency, collaboration and participation, the NTP should --

1. Release the current draft of the “NTP Approach for Reaching Conclusions for Literature-Based Evidence Assessments” (“draft Approach”) for a 60-day public comment period, and then

¹ http://www.whitehouse.gov/the_press_office/TransparencyandOpenGovernment (accessed on Dec. 6, 2012).

² <http://www.hhs.gov/open/> (accessed on Dec. 6, 2012).

³ <http://www.hhs.gov/secretary/about/priorities.html> (accessed on Dec. 6, 2012).

⁴ Department of Health and Human Services Open Government Plan, Version 2.0 (April 9, 2012), p. 4.

⁴ <http://www.hhs.gov/open/> (accessed on Dec. 6, 2012).

- provide a reasonable opportunity for substantive public presentations to the NTP's Board of Scientific Counselors (BSC);
2. Adopt a practice of providing the public with every program document, draft or final, that is provided to the BSC at the same time as the document is provided to the BSC.

The process employed by the NTP to generate and obtain review of the draft Approach – which process is described in detail in ACC's comments of November 27, 2012 – has not been conducive to stakeholder collaboration and participation in the development and review of the draft Approach. Indeed, the timing of the release of the draft Approach to the BSC for discussion is not conducive to a productive, substantive discussion of the draft Approach at the BSC meeting on December 11th. If the final Approach is to be useful and of high quality, the BSC and stakeholder reviewers must look beyond whether the approach is well-written and logical, and consider whether it is (1) workable as a scientific and practical matter, and (2) sufficiently detailed to ensure objective, consistent evaluations of hazards across chemicals. That type of review and analysis will take more than the approximately two weeks provided by the NTP for review of the current draft. Consequently, GE requests that the NTP provide a 60-day public comment period on the draft Approach; provide a reasonable opportunity for public engagement with the BSC on the draft Approach; and, in future, make documents provided to the BSC publicly available when they are provided to the BSC.

Thank you for your consideration of these requests.

Sincerely,

/s/

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