



Dr. Lori White  
Designated Federal Officer for the BSC  
Office of Liaison,  
Policy and Review Division of NTP, NIEHS  
P.O. Box 12233, K2-03  
Research Triangle Park, NC 27709

3 December, 2012

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

Dear Dr. White:

The International Institute of Synthetic Rubber Producers, Inc (IISRP) appreciates the opportunity to provide comments to the National Toxicology Program Board of Scientific Counselors on NTP's approach to the review and integration of evidence in literature based health assessments. In our opinion, it is vitally important for the NTP to become more transparent in its process and with improved opportunity for public comment in the scientific deliberations.

The IISRP has conducted considerable scientific research on many chemicals reviewed by the NTP and we have been frustrated with the lack of transparency behind the deliberations of the BSC. We have presented sound scientific data only to have it discounted during the review process.

We have reviewed the comments provided by the American Chemistry Council (ACC) where they present a series of events where it the NTP has precluded public input. We fail to see the rationale for these actions and we fully support the requests made by the ACC in their comments. We therefore urge the NTP to adopt a more transparent approach and more fully engage the public in the review process.

Sincerely,

[Redacted]

James L. McGraw  
Managing Director and CEO  
International Institute of Synthetic Rubber Producers, Inc.