



NATURAL RESOURCES DEFENSE COUNCIL
THE EARTH'S BEST DEFENSE

December 7, 2012

**Comments from the Natural Resources Defense Council
To the December 11th NTP Board of Scientific Counselors Meeting
On the NTP Approach for Systematic Review and
Evidence Integration for Literature-based Health Assessments**

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Comments submitted to Lori White at whiteld@niehs.nih.gov

To the NTP Board of Scientific Counselors:

The Natural Resources Defense Council (NRDC) submits these comments on the NTP Approach for Systematic Review and Evidence Integration for Literature-based Health Assessments. NRDC is a non-profit public interest organization with over 1,200,000 members and online activists dedicated to protecting public health and the environment. We have no financial interest in the deliberations of this meeting.

We are very pleased and supportive of the NTP approach for systematic review and evidence integration for literature-based health assessments. It is a thoughtful and comprehensive approach which we appreciate. In addition to being very scientifically credible, it is described in an easy-to-understand way that facilitates meaningful public participation. In particular, the flow chart diagram makes the approach easy to grasp.

We would like to strongly encourage NTP, when assessing [Step 7](#) of their process, to make sure that the approach is harmonized with major hazard identification approaches described by the IARC Monographs on the Evaluation of Carcinogenic Risk to Humans, California OEHHA chemical assessment approaches, and other globally-harmonized hazard ID approaches that enjoy widespread acceptance among the environmental health community. The purpose of having a harmonized system is to promote common, consistent criteria for classifying chemicals according to their health, physical and environmental hazards, and to encourage the use of compatible hazard labels, material safety data sheets for workers, and other hazard communication information based on the resulting classifications, thus improving health protection.

Thank you for the opportunity to provide comments on your important work.

Sincerely,

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