



June 2, 2015

Lori White, Ph.D.

Designated Federal Officer for the Board of Scientific Counselors (BSC)

Office of Liaison, Policy and Review

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via email: whiteld@niehs.nih.gov

Re: AHPA Comments on agenda item for NTP Board of Scientific Counselors meeting

Dear Dr. White,

The American Herbal Products Association (AHPA) is the national trade association and voice of the herbal products industry. AHPA is comprised of domestic and foreign companies doing business as growers, collectors, processors, manufacturers, marketers and distributors of herbs and herbal products. AHPA serves its members by promoting the responsible commerce of products that contain herbs.

On April 28, 2015, the National Institutes of Health published a Federal Register notice to announce the next meeting of the Board of Scientific Counselors (BSC) of the National Toxicology Program (NTP), now scheduled on June 16, 2015. The April 28 notice also stated that written public comments may be submitted by June 2, 2015. AHPA is therefore submitting the comments herein to address the subject identified in the meeting's Preliminary Agenda as "NTP Tools and Approaches for Enhancing Evaluation and Communication of Analysis Activities."

AHPA recognizes that the specific presentations planned under this agenda item are all related to certain tools now used or in development for use in several of the analysis activities undertaken by NTP. In AHPA's view, however, no discussion of enhancing communication about NTP's activities can be complete without a thorough review of the tools and approaches that NTP uses to inform the public of its activities.

AHPA is particularly interested in the tools and approaches that NTP currently uses to communicate to the public on meetings of the Board of Scientific Counselors and each of its subcommittees and working groups. AHPA believes such communication needs to be improved and can only be complete if NTP retains and makes available to the public complete and easily accessible records of each of these meetings.

NTP's current approach for communicating to the public about past meetings of the BSC and its subcommittees and working groups is to use its website as the tool for posting documents that present only a partial record of these meetings. Thus, NTP

generally posts on its website several specific records, including summary minutes of each such meeting.

In order to make these records complete, AHPA strongly encourages NTP to reinstate its former practice of archiving and posting on its website the webcast it hosts for each such meeting and a complete transcript of each such meeting. Re-establishment of such a practice would increase transparency and foster more complete communication of NTP's research activities.

NTP at one time did archive webcasts and transcripts of meetings of at least one BSC subcommittee, its Technical Reports Review Subcommittee, but discontinued this practice in late 2009 or early 2010. AHPA has previously requested that NTP reinstate this policy and in June 2013 the Report of the Senate Committee on Appropriations encouraged NTP to "reinstigate its practice of making available on its Web site a transcript and/or recording of its public meetings."¹ This has not been done with regard to NTP's public meetings in the intervening years.

Since the agency at one time employed this transparent approach in communicating its activities the tools and technology platform to renew this practice must already exist. AHPA strongly believes there is tremendous value for the public to be able to access archived webcasts and transcripts of meetings of the BSC and its subcommittees and working groups and hopes the BSC will join AHPA in encouraging NTP to reestablish this communications approach in the interest of fostering good public policy and transparency and presenting complete reports of all of NTP's public meetings.

AHPA appreciates the opportunity to comment on this matter. Please feel free to contact me if you would like to discuss the issues raised here in more detail.

Respectfully submitted,

[Redacted]

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¹ Departments of Labor, Health and Human Services, and Education, and Related Agencies Appropriation Bill, 2014, Report by Mr. Harkin from Committee on Appropriations, National Institute of Environmental Health Sciences, June 2013.