



**Battery  
Council  
International**

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September 29, 2003

Dr. C.W. Jameson  
National Toxicology Program  
Report on Carcinogens  
MD EC-4  
P.O. Box 12233  
Research Triangle Park, NC 27709

Re: Comments on Lead Background Document

Dear Dr. Jameson

These comments on submitted on behalf of the Battery Council International (“BCI”)<sup>1</sup> in response to the National Toxicology Program’s (“NTP”) publication of the Report on Carcinogens Background Document for Lead and Lead Compounds. *See* [www.ntp.server.niehs.nih.gov/newhomeroc/roc11/Lead-Public.pdf](http://www.ntp.server.niehs.nih.gov/newhomeroc/roc11/Lead-Public.pdf) (searched May 16, 2003).

As more fully described in the comments of the International Lead Zinc Research Organization (“ILZRO”), incorporated by reference herein, BCI does not believe there is enough evidence from epidemiological studies to warrant the listing of lead and lead compounds as *known human carcinogens*. This is because the actual compound(s) of lead, the routes of exposure, and levels of lead to which humans have been exposed have not been reported and potential confounders (e.g., exposure to arsenic, cadmium, antimony, drinking alcohol, and smoking) have not been adequately controlled or isolated in the studies cited in the Background Document.

Given the failure of the epidemiological studies cited in the Background Document to adequately control for confounders such as exposure to other carcinogenic compounds and to

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<sup>1</sup> BCI is a not-for-profit trade association representing commercial entities involved in the manufacture, distribution, sale and reclamation of lead-acid batteries. BCI’s members and associate members include manufacturers and distributors of lead-acid storage batteries for automotive, marine, industrial, stationary, specialty, consumer and commercial uses, and secondary lead smelters that reclaim (recycle) the batteries once they are spent. BCI’s membership represents more than 99% of the nation’s domestic battery manufacturing capacity and more that 90% of the nation’s lead battery recycling capacity.

correlate increased lead exposures to the increased incidence of cancer, a causal relationship between lead exposure and an increased cancer risk cannot be established. As such, the nomination of lead and its compounds as *known human carcinogens* should be rejected.

Sincerely,

A handwritten signature in black ink that reads "Tim J. Lafond /sm". The signature is written in a cursive style with a large, stylized initial "T".

Timothy J. Lafond  
Chairman, BCI Environment Committee