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Dr. C. W. Jameson
National Toxicology Program
Report on Carcinogens
79 Alexander Drive
Building 4401
Room 3118
P.O. Box 12233
Research Triangle Park, North Carolina

Sent via email to: jameson@niehs.nih.gov

Dear Dr. Jameson,

I am writing on behalf of the Weed Science Society of America (WSSA) regarding the Federal Register Notice of May 19, 2004 that listed the herbicide atrazine as one of the compounds that would be reviewed for inclusion in the National Toxicology Program "Report on Carcinogens". WSSA is a not-for-profit association of academic, government and industry scientists working in research, regulation and education who are committed to improving the knowledge and management of weeds in agricultural, aquatic, forest, horticultural, industrial, right-of-way, rangeland and natural area environments. The Weed Science Society of America and its affiliates, the Aquatic Plant Management Society, the Northeastern Weed Science Society, the North Central Weed Science Society, the Southern Weed Science Society, and the Western Society of Weed Science represent over 4,000 members nationwide

I am writing today because it seems inappropriate to even consider atrazine for inclusion on this list at this time. The question of any potential human carcinogenicity of atrazine has been thoroughly reviewed by the Environmental Protection Agency (EPA). After consultation with the Science Advisory Panel (SAP), a federally chartered panel of distinguished independent scientific experts, the EPA issued the finding in May 2002 and again in October 2003 that atrazine is "not likely to be carcinogenic to humans."

The Report on Carcinogens is Congressionally mandated to list substances that "either are known to be human carcinogens or may reasonably be anticipated to be human carcinogens." Certainly a compound that was found "not likely to be carcinogenic to humans" by one federal agency after comprehensive review does not belong on a list of compounds that "may reasonably be anticipated to be human carcinogens" being prepared by another federal agency. At a minimum this appears inconsistent with Congressional intent.

This “nomination” of atrazine for this listing is troubling because the nomination by National Institute of Environmental Health Sciences (NIEHS) is justified on the basis of only selected portions of the 1999 International Agency for Research on Cancer (IARC) report while the more recent EPA reports issued in 2002 and 2003 were overlooked. It is important to note that the EPA, and the SAP convened specifically to examine atrazine’s potential human carcinogenicity, considered the 1999 IARC report in its entirety prior to publication of their 2002 and 2003 reports.

A final concern is that the community surface drinking water system exposure data listed in the Federal Register to justify the NIEHS nomination of atrazine is outdated. Specific mitigation and exposure reduction efforts have been implemented in the past two years as part of the “reregistration” process whereby the EPA specifies required monitoring and mitigation measures to ensure compliance. Currently, these stringent new use restrictions and associated monitoring make it highly unlikely that “ a significant number of people residing in the United States are exposed” to levels that exceed the stringent health standard via these community surface drinking water systems.

In closing, WSSA has gone on record repeatedly to document the utility, value and benefits of this very important herbicide and we will gladly make such information available if necessary. However, the more important fundamental issue is that the NTP should not proceed with an ad hoc, independent listing of atrazine as potentially carcinogenic to humans when a recent, thorough and credible analysis by another federal agency came to the opposite conclusion. We are concerned that this is inappropriate use of scientific resources and that such a process could tarnish the perception of a valuable weed management tool.

Sincerely,

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