July 16, 2004

Dr. C. W. Jameson
National Toxicology Program
Report on Carcinogens
79 Alexander Drive
Building 4401, Room 3118
P.O. Box 12233
Research Triangle Park, NC 27709

Dear Dr. C.W. Jameson,

Attached please find a series of letters that Health Care Without Harm would like to submit for the record as public comment on the National Toxicology Program’s Report on Carcinogens, Twelfth Edition. We are strongly opposed to the request to de-list Di (2-ethylhexyl) phthalate (DEHP) as “reasonably anticipated to be a carcinogen,” based on the reclassification by IARC.

The IARC decision to downgrade DEHP to “not classifiable as to carcinogenicity to humans” was based on a flawed investigation that overlooked significant evidence of links to pancreatic tumors. Attached are several letters published in 2003 in the International Journal of Occupational and Environmental Health describing the flaws in the IARC DEHP evaluation. Furthermore, the letters show that IARC has been widely criticized for industry influence in its decisions to downgrade, with DEHP cited as a prime example.

To date, IARC has not responded to these concerns, and has not considered the evidence linking DEHP to pancreatic tumors. Therefore, in our view, the IARC listing cannot conscionably be used as a basis for making further decisions on DEHP.

Sincerely,

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Health Care Without Harm
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is an international coalition of 437 organizations in 52 countries working to transform the health care industry so it is no longer a source of harm to people and the environment. See
Please Note: Due to Copyright Infringement Laws the letters to the editor and editorials referred to in Stacy Malkan’s public comments cannot be publicly displayed. Listed below are the citations for these letters and editorials.

Report on Carcinogens Group
National Toxicology Program


