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President & CEO

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Dr. C.W. Jameson
National Toxicology Program
Report on Carcinogens
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SEP 18 2006

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RE: Comments on the Proposed Review Process for the 12th Report on Carcinogens

Dear Dr. Jameson,

The Cosmetic, Toiletry, and Fragrance Association¹ (CTFA) appreciates the opportunity to comment on the proposed review process for the 12th Report on Carcinogens (RoC). Although we support the addition of public and expert peer review of the draft background documents, we have a few concerns regarding the proposed review process.

Our first concern is the requirement that in the preparation of the background document the "data used to prepare Sections 3 through 5 must come from publicly available, peer-reviewed sources." This requirement should serve to encourage investigators to have their data published, but it would be unfortunate if important recent data were not considered because there simply has not been enough time to complete the publication process. As the consideration of substances for listing in the RoC includes an expert peer review panel, this panel should be asked to review data finalized in the last 2 years that have not yet been published to determine if the new data would impact the decision to list a substance.

The proposed review process provides opportunity for the public to comment before and during the expert panel meeting. The expert panel will make a recommendation regarding the listing

¹Based in Washington, D.C., CTFA is the trade association representing the cosmetic, toiletry, and fragrance industry in the United States and globally. Founded in 1894, CTFA has a membership of nearly 600 companies including manufacturers, distributors, and suppliers for the vast majority of finished personal care products marketed in the United States.

status for the candidate substance. We are concerned that the meetings where NTP actually decides whether or not a substance is to be listed (meetings of the interagency scientific review group (ISRG) and senior scientists from the NIEHS/NTP staff (NSRG)) are closed to the public. This will not increase the transparency of the listing process. It would be helpful to allow public observers at the meetings where decisions about listing are completed. If this is not possible, a written record of the meeting concerning why a decision was made should be available to the public before the RoC is posted. This would be especially important if the decision whether or not to list a substance is different than that recommended by the expert panel.

The proposed review process includes a review of the draft substance profiles by the Board of Scientific Counselors (BSC). Although the process includes an opportunity for the public to comment on the profiles, it is not clear why the BSC needs to meet in closed session to peer review the draft substance profiles.

Thank you for the opportunity to comment on this proposed review process.

Sincerely,

[Redacted]

John Bailey, Ph.D.
Executive Vice President - Science