July 7, 2005

Dr. C. W. Jameson
National Toxicology Program Report on Carcinogens
79 Alexander Drive
Building 4401, Room 3118
PO Box 12233
Research Triangle Park, NC 27709
jameson@niehs.nih.gov

Subject: Additional Comments on the Proposed Listing of Atrazine in the Report on Carcinogens, Twelfth Edition
[Department of Health and Human Services. Public Health Service. National Toxicology Program; Call for Additional Public Comments on 21 Substances, Mixtures and Exposure Circumstances Proposed for Listing in the Report on Carcinogens, Twelfth Edition. Federal Register Notice Vol. 69, No. 205/Monday October 25, 2004; 62276-62279.]

Dear Dr. Jameson:

The American Farm Bureau Federation (AFBF) submitted comments on the proposed nomination of atrazine listing consideration in the National Toxicology Program's (NTP) Report on Carcinogens (RoC) on Nov. 23, 2004. Now, with the National Corn Growers Association (NCGA), we would like to reiterate our original comments. Additionally, AFBF and NCGA have been made aware of an additional review of atrazine's safety that should be considered when weighing the information for this proposed listing.

AFBF and NCGA represent American farm and ranch families producing food and fiber for the world. Atrazine is critically important for production of corn and sorghum in the United States and therefore its availability affects farmers who produce the safest food supply in the world.

We understand that the NTP solicits public input for potential listings and asks for relevant information concerning their carcinogenesis, as well as current production data, use patterns, or human exposure information. The NTP also invites interested parties to identify any scientific issues related to the listing of a specific nomination in the RoC that they feel should be addressed during the reviews. Since the NTP initiates an independent search and review of the literature and prepares a background document for each nomination under consideration, AFBF and NCGA submit additional information from a recent review of atrazine's safety by the Australian Pesticides & Veterinary Medicines Authority (APVMA) for utilization in the assessment of the potential listing of atrazine.

The APVMA issued its Final Review Report (including additional assessments) entitled "The reconsideration of approvals of the active constituent atrazine, registrations of products containing atrazine, and their associated labels" (report attached). This report is a comprehensive assessment of the safety of atrazine including any carcinogenic potential. Among other findings, the APVMA review concludes: "Therefore atrazine is unlikely to be an endocrine disruptor in humans, based on the known mechanism of action in SD rats….It was concluded that the epidemiological data provided support for the absence of a carcinogenic potential for atrazine. The environmental reports are considered by the agencies that provide expert advice to the APVMA as unlikely to have a direct relevance to human health."

The Australian Office of Chemical Safety (OCS) completed a comprehensive evaluation of the mammalian toxicology and metabolism/toxicokinetics of atrazine as part of the APVMA's Chemical Review Program. The OCS concluded:

- *The earlier onset in mammary tumours was not seen in male SD rats, in female Fischer 344 rats, or male or female CD-1 mice;*

- *It was likely that the response observed in SD female rats only occurs above a certain threshold;*
- *The background incidence of mammary tumours was significantly higher in female SD than in female Fischer 344 rat. For example, NCI data (1980) indicated a 36.4 percent historical control incidence for mammary tumours in SD rats and a 17.9 percent incidence in Fischer rats;*
- *The available evidence indicates that neither atrazine nor its metabolites are genotoxic in animal cells;*
- *In humans, menopausal women develop episodes of declining oestrogen secretion and longer periods of low oestrogen levels, in contrast to the situation in aging SD rats. Therefore it would appear that the atrazine response in SD rats is not an appropriate surrogate for the assessment of human risk for mammary tumour development.*
- *These recently published epidemiological data provide support for the absence of any carcinogenicity potential of atrazine.*

AFBF and NCGA believe we would be remiss in failing to bring this safety assessment to the NTP's attention. This APVMA safety assessment is consistent with the recent extensive review of atrazine's carcinogenic potential conducted by the U.S. Environmental Protection Agency (EPA) which concluded that atrazine is "Not likely to be carcinogenic to humans" and with the WHO's International Agency for Research on Cancer's (IARC) decision that "there was strong evidence that the mechanism responsible for mammary tumor formation in the Sprague-Dawley rat is not relevant to humans."

Along with NCGA, AFBF continues to support EPA's recommendation that atrazine be removed from the list of additional agents for possible listing in the next edition of the RoC. The activity of considering atrazine for possible listing in the next RoC is duplicative and seemingly unnecessary in light of work already done by three highly scientifically qualified agencies, EPA, IARC and now APVMA. We believe that there is no value in NTP's nomination for listing consideration of atrazine since these aforementioned agencies have determined there is no basis for concluding that atrazine is or may be carcinogenic to humans, and we reiterate the request that the nomination be removed from further consideration.

Sincerely,

[Redacted] [Redacted]

Mark Maslyn
Executive Director, Public Policy
AFBF

Jon Doggett
Vice-President, Public Policy
NCGA

Attachment: Australian Pesticides & Veterinary Medicines Authority, "The reconsideration of approvals of the active constituent atrazine, registrations of products containing atrazine, and their associated labels."

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