

November 22, 2004

Dr. C. W. Jameson  
National Toxicology Program Report on Carcinogens  
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Subject: 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:

I am submitting comments on the subject document on behalf of the National Grain Sorghum Producers Association. As we understand it, Dr. Christopher Portier from NIEHS has nominated atrazine for consideration for listing in the National Toxicology Program (NTP) Report on Carcinogens (RoC). Since EPA has recently completed an extensive review of atrazine's carcinogenic potential and found it to "not be carcinogenic to humans", an additional review at this time is not warranted. The Sorghum Producers also find this interesting since Dr. Portier chaired both of the EPA's Scientific Advisory Panels that considered the carcinogenicity of atrazine (2000, 2003) and at the 2000 SAP he stated: "I strongly feel the evidence does not support a not-likely classification (emphasis added)." This recent nomination for review by Dr. Portier appears to be an attempt to manipulate the EPA regulatory process to adhere to a different agenda.

Additionally, the NIEHS nomination of atrazine by Dr. Portier used an incomplete rationale. Citation of an International Agency for Research on Cancer (IARC) atrazine review was used in the rationale, but was taken completely out of context. The NIEHS rationale lists IARC's conclusion as "finding of sufficient evidence of carcinogenicity in animals" but the nomination justification completely leaves out the IARC conclusions on the relevance to humans. IARC states while there was sufficient evidence for carcinogenicity in the SD rat, after considering the atrazine mode of action research, the IARC concluded that "there was strong evidence that the mechanism responsible for mammary tumor formation the Sprague-Dawley rat is not relevant to humans and categorizes atrazine as "not classifiable as to carcinogenicity to humans (Group 3)." Interestingly enough there are two other compounds on the list of nominations for the 12<sup>th</sup> RoC that are being considered for "delisting" based on an IARC Group 3 classification.

During the last comment period EPA submitted a letter to NTP requesting removal of atrazine from the nomination review process. We support the Agency's request in that matter. EPA cites both internal peer review and numerous external peer reviews

of atrazine's mechanism of action in the Sprague Dawley rat (one species, one sex) and they have found that this mechanism is not relevant to humans. They have also committed to review the Agricultural Health Study results when complete. NTP has stated in its new Vision for the 21<sup>st</sup> Century that it will "focus on risk to humans, not risk to rats, mice and other species" and because of limited resources will "determine which compounds should be a priority as they impact public health." Allowing atrazine to remain in the nomination review process is in complete disregard for the new vision.

Atrazine is an important tool for the US sorghum producers and we have completely supported EPA's review of the product's safety using the sound science. It would be irresponsible to now allow atrazine's safety profile to be subject to another carcinogenic review based on the NIEHS agenda of circumventing EPA's regulatory authority. Atrazine must be taken out of the nomination review process immediately.

Sincerely,

[Redacted]

James Vorderstrasse  
President  
National Grain Sorghum Producers