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Dr. C. W. Jameson
Report on Carcinogens
79 Alexander Drive
P.O. Box 12233
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Dr. Jameson:

The purpose of my letter is to reiterate points that I made to the NTP Board of Scientific Counselors on June 29, 2004 and to respectfully request that atrazine be removed from the list of nominations for the 12th Report on Carcinogens.

NTP lists IARC's "finding of sufficient evidence of carcinogenicity in animals" as the basis for atrazine's nomination¹. This rationale is incorrect and this statement, by itself, is misleading and has been taken out of the context of IARC's overall evaluation. IARC recognized the increased incidence of atrazine-related mammary tumors in the female Sprague-Dawley rat, but went on to interpret the relevance of this finding and clearly declared, "Therefore, there is strong evidence that the mechanism by which atrazine increases the incidence of mammary gland tumours in Sprague-Dawley rats is not relevant to humans."² If NTP chooses to use only part of IARC's evaluation to nominate atrazine, then perhaps it can then use the rest of the evaluation to reconsider and rescind its nomination.

Atrazine's mode of action in causing mammary tumors in female Sprague-Dawley rats has been extensively studied and reviewed, and the conclusion is unanimous that the well-identified mode of action is not relevant to potential cancer causation in humans. Along with IARC's conclusion that atrazine is "Not Classifiable (Group 3)", the EU, Australian, and EPA reviewers have each rendered judgments that atrazine is not likely to be carcinogenic in humans. With this degree of consensus, it seems pointless for NTP to expend the time and resources to retread the scientific ground so thoroughly and competently covered by multiple regulatory agencies. Atrazine should not be on NTP's list of nominations for the 12th Report on Carcinogens.

Sincerely,
[Redacted]

James A. Swenberg, D.V.M., Ph.D.

¹ WHO (1999). IARC Monographs on the Evaluation of Carcinogenic Risks To Humans. Atrazine. 73:59-113. (see page 99)

² IBID