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

RE: 69 FR 28940: National Toxicology Program; Call for Public Comments on  
21 Substances, Mixtures and Exposure Circumstances Proposed for Listing in  
the Report on Carcinogens, Twelfth Edition

Dear Dr. Jameson:

The Rubber Manufacturers Association ("RMA") and its tire manufacturing  
members is pleased to comment on the consideration for possible listing in the upcoming  
Report on Carcinogens by the National Toxicology Program ("NTP") as published in the  
Federal Register of May 19, 2004. Our members use talc in their manufacturing  
processes and have a substantial interest in its potential listing.

The Rubber Manufacturers Association is the national trade association for the  
rubber products industry. Its members include more than 100 companies that  
manufacture various rubber products, including tires, hoses, belts, seals, molded goods,  
and other finished rubber products. RMA members employ over 120,000 workers and  
account for more than $21 billion in annual sales.

The NTP deferred consideration of listing talc (asbestiform and non-asbestiform)  
in the 10th Report on Carcinogens (RoC) due to confusion in the scientific literature over  
the mineral nature of talc. The NTP has now decided to characterize talc exposure as  
cosmetic talc and occupational exposure to talc with no distinction between asbestiform  
and non-asbestiform. The NTP has further proposed to conduct a review on the basis that  
human epidemiological studies reporting an increase of cancer in workers exposed to  
talc. The RMA contends that there are no compelling reasons to review talc at this time.

The RMA takes this position for a number of reasons. First, the current NTP  
characterization seems to ignore the potential contribution of asbestiform fibers to cancer  
risk. It is also contradictory to the characterizations used by the International Agency for
Research on Cancer (IARC)1 and the American Conference of Governmental Industrial Hygienists (ACGIH)2 for talc. Both IARC and ACGIH recognize the etiological differences between asbestiform and non-asbestiform fibers.

Second, the basis for conducting the review does not appear to be supported by three recent human epidemiological studies of talc miners and millers, conducted in Italy3, Japan4, France and Austria5.

Third, from an alternative perspective, a recent article6 confirms that the practice of using talc as a treatment that is applied directly to the lining of the lung remains the internationally accepted treatment of choice for certain diseases of the lining of the lung—and has been for nearly 100 years. No studies have indicated any increased risk of the development of lung cancer in patients receiving talc application to the lining of the lung.

In summary, the current literature does not support either the NTP characterization or basis for review. Thus, the RMA believes that there is very little to be gained from reviewing talc at this time. We urge the NTP Executive Committee to reject the nomination to list talc in the twelfth Report on Carcinogens.

Sincerely,

Kim Weber
Director, Government Affairs

1IARC Monograph Silica and Some Silicates. 1987; 42:185 and Supplement 7:349
2ACGIH Threshold Limit Values 2004
3An update of a mortality study of talc miners and millers in Italy. Am J Ind Med. 2003 July; 44(1); 63-9