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Styrene Information and Research Center Asks NIEHS Director to Defer NTP Styrene Review Pending Re-write of Substance Profile

The Styrene Information and Research Center (SIRC) on Jan. 22, 2009, asked the director of the National Institute of Environmental Health Sciences (NIEHS) and its National Toxicology Program (NTP) to intervene to put consideration of listing styrene in the NTP's 12th Report on Carcinogens (RoC) back on a course of reasonable scientific discourse and review.

Currently, the NTP's Board of Scientific Counselors (BSC) is due to review the NTP's Draft Substance Profile on styrene on Feb. 24, 2009, toward possible inclusion in the 12^{th} RoC. Styrene was nominated in 2004 for possible reference in the RoC. In July 2008, the NTP proposed a "reasonably anticipated to be a human carcinogen" listing – a characterization that is not scientifically supportable.

Specifically, SIRC Executive Director Jack Snyder's January 8 letter to Dr. Linda S. Birnbaum asks her to:

- Defer styrene's review to a subsequent BSC meeting in order for the NTP to address what SIRC believes are serious deficiencies in the draft profile on styrene;
- Direct senior NTP staff to draft an appropriate companion document to the styrene profile, which thoughtfully reflects contrasting data and viewpoints that have been omitted from the draft profile, and which addresses the NTP's rationale for discounting these important contributions;
- Make this companion document available for public review and comment in the same fashion as the draft profile, presumably when announcing the next BSC meeting, and
- Ensure that this companion document is made available transparently to the BSC in advance
 of its meeting, and is given direct and careful consideration during the course of that
 meeting.

SIRC has sent a similar letter Dr. Birnbaum on Jan. 8, 2009, before she assumed her new post. SIRC's January 22 letter to Dr. Birnbaum is the latest in a string of correspondence that SIRC has sent to various NTP officials concerning their move to include styrene in the 12th RoC – an action unwarranted by the latest available scientific evidence. This evidence includes a new

comprehensive review of the applicable science, including the NTP's scientific documentation, by a panel of world-renowned scientists, which they provided to the NTP on Dec. 15, 2008.

That report, "Epidemiologic studies of styrene and cancer: A review of the literature," by Boffetta et al.¹, concluded: "The available epidemiologic evidence does not support a causal relationship between styrene exposure and any type of human cancer." SIRC commissioned the Boffetta et al. report and received it shortly after the authors provided it to the NTP; SIRC had no prior knowledge of its contents.

The *RoC* is a congressionally mandated listing of "known" and "reasonably anticipated to be" human carcinogens; the Secretary of Health and Human Services delegates its preparation to the NTP. *RoC* listings carry no automatic regulatory implications, but frequently are cited in regulatory decision-making.

(Note to editors: SIRC's January 22 and 8 letters to Dr Birnbaum, separate SIRC statements on NTP process shortcomings, generally; the Boffetta et al. report, and the full report, itself, along with SIRC's correspondence to and from the NTP since the NTP process began are available by request to SIRC communications advisor Joe Walker, walkercom2@aol.com or 703-491-3301.)

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¹ Paolo Boffetta, M.D., M.P.H., International Agency for Research on Cancer, Lyon, France; Vanderbilt University, Nashville, Tenn.; Hans-Olav Adami, M.D., Ph.D., and Dimitrios Trichopolous, M.D., M.S., Ph.D., Department of Epidemiology, Harvard School of Public Health, Boston, Mass.; Philip Cole, M.D., Dr.P.H., School of Public Health, University of Alabama, Birmingham, Ala., and Jack Mandel, Ph.D., M.P.H., Dalla Lana School of Public Health, University of Toronto, Ontario, Canada.