

Alkyl acetate C6 to C13 category - Comments of Environmental Defense

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Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Alkyl acetate C6 to C13 category.

Recommendations on establishing categories of chemicals under the HPV program need to be carefully scrutinized because a permissive and scientifically weak approach could raise serious public health questions. However, in the case of the Alkyl acetates [C6-C13] the justification for a category is convincing based on physiochemical properties, environmental fate and transport, metabolism and health effects data for specific members of the family. It is therefore appropriate to extrapolate to untested endpoints among category members. For example, repeated dose data is available for C6, C7-9 and C11-13 so it seems unnecessary to test C8-10 or C9-11.

We agree with the proposal for no further testing since the results would have little scientific or risk assessment value and would unnecessarily use animals.

Thank you for this opportunity to comment.

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