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PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS

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December 17, 2003

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Michael O. Leavitt, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building (1101A)
1200 Pennsylvania Ave., NW
Washington, DC 20460

Re: Comments on the HPV test plan for trichloro-s-triazinetrione

Dear Administrator Leavitt:

The following comments are on the test plan for trichloro-s-triazinetrione (CAS no. 87-90-1), prepared by the Isocyanurate Industry *Ad Hoc* Committee. These comments are submitted on behalf of People for the Ethical Treatment of Animals, the Physicians Committee for Responsible Medicine, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These animal, health and environmental protection organizations have a combined membership of more than ten million Americans.

In the test plan, cover letter and attached summaries, the *Ad Hoc* Committee has presented a great deal of data from previous studies carried out by both itself and other organizations, and on the basis of these data it has appropriately concluded that no additional testing is necessary under the High Production Volume Chemical Challenge.

Trichloro-s-triazinetrione hydrolyzes to isocyanuric acid in water, and the *Ad Hoc* Committee has therefore appropriately decided to use toxicity data for the isocyanurate ion (either isocyanuric acid or monosodium isocyanurate) both to supplement the data for trichloro-s-triazinetrione and instead of them, for endpoints where there are data gaps. This approach on the part of the *Ad Hoc* Committee represents an application of the following principle, which has been repeatedly stated by the EPA:

“Participants shall maximize the use of scientifically appropriate categories of related chemicals and structure activity relationships.” (Wayland, letter, Oct. 4, 1999, <http://www.epa.gov/chemrtk/ceoltr2.htm>, “Data collection and development on HPV chemicals”, Dec. 26, 2000, *Federal Register*, Vol. 65, No. 248, p. 81691).

Thank you for your attention to these comments. I can be reached at 757-622-7382, extension 1304, or via e-mail at JessicaS@PETA.org.

Sincerely,

Jessica Sandler
Federal Agency Liaison