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June 25, 2004

Michael O. Leavitt, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building, 1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: Comments on the HPV Test Plan for 7-benzofuranol,2,3-dihydro-2,2-dimethyl-methyl carbamate

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Dear Administrator Leavitt:

The following comments on FMC's test plan for the chemical 7-benzofuranol,2,3-dihydro-2,2-dimethyl-methyl carbamate are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

FMC Corporation submitted its test plan on December 31, 2003, for the chemical 7-benzofuranol,2,3-dihydro-2,2-dimethyl-methyl carbamate (CAS No. 1563-66-2), also known as Carbofuran. This chemical is used both as a pesticide and as an intermediate in the production of another pesticide. We are pleased to see that FMC has employed the extensive database available on the toxicity of carbofuran, including its regulation by both TSCA and FIFRA, to meet all required SIDS testing endpoints. Substantial hazard data have been made available to the EPA and we concur that no additional animal testing is required under the HPV Challenge program.

The carbamate class of pesticides, including carbofuran, had been extensively studied both individually and as a group, most recently to meet the requirements of FQPA. It seems contradictory that FMC and their product, carbofuran, even comes under the purview of the HPV program and is a dilution of resources of both FMC and EPA. No SIDS endpoint would further enhance the understanding of these chemicals. Thank you for your attention to these comments. I may be reached at 202-686-2210, ext. 327, or via e-mail at meven@pcrm.org.

Sincerely,

Megha Even, M.S.
Research Analyst

Chad B. Sandusky, Ph.D.
Director of Toxicology and Research