

C.I. Disperse Blue 79:1 — Comments of Environmental Defense

(Submitted via Internet 6/24/02)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for C.I. Disperse Blue 79:1 (CAS# 3618-72-2).

General Comment:

Although use and exposure data are not required under the HPV program, we encourage sponsors to provide such data in order to allow fuller evaluation of the hazard information provided through the HPV program. Exposure data would be particularly beneficial with regard to C.I. Disperse Blue 79:1 as this substance is a dye and dyes have many uses that result in consumer exposure. That is, in addition to cloth, leather, etc. used in apparel and upholstery, dyes may also be used to color food and drugs that are consumed directly. Regrettably, the Test Plan contains no description of uses or possible sources of human or environmental exposure to C.I. Disperse Blue 79:1.

Specific Comments:

1. Most dyes are sold based on the color they produce in the desired substrate rather than their chemical purity. Many dyes are thus a complex mixture rather than pure chemicals. Information on the purity of C.I. Disperse Blue 79:1 and the primary ingredients would be a desirable addition to data presented in the Robust Summary.
2. We feel bridging data from the closely related dye, C.I. Disperse Blue 79, is well justified and would encourage the inclusion of any additional data that might be available.
3. Table 1 of the Test Plan presents data on reproductive toxicity. However, we were unable to locate in the Robust Summary a description of a study of reproductive toxicity and the resulting data. Could these data have been in sections 5.7 and 5.8, which seem to be missing from the Robust Summary? In any case, reproductive toxicity data are required and the appropriate studies should be described in the Robust Summary; until this information is provided, the Test Plan cannot be regarded as complete.

Thank you for this opportunity to comment.

Hazel B. Matthews, Ph.D.
Consulting Toxicologist, Environmental Defense

Karen Florini
Senior Attorney, Environmental Defense