

March 24, 2003

The Honorable Christine Todd Whitman
Administrator (1101A)
US Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

Subject: Comments on the HPV test plan and robust summary for the diisopropylbenzene category, prepared by the American Chemistry Council's Hydroquinone Precursors and Derivatives Panel Diisopropylbenzene Task Force



PETA

PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS

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Dear Administrator Whitman:

The following comments are on the test plan for two isomers of diisopropylbenzene and one mixture of isomers, prepared by the American Chemistry Council's Hydroquinone Precursors and Derivatives Panel Diisopropylbenzene Task Force (referred to below as the Task Force). 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 U.S., the Doris Day Animal League, and Earth Island Institute. These health, animal, and environmental protection organizations have a combined membership of more than ten million Americans.

The Task Force has presented a great deal of data in the test plan from previous studies carried out by the Task Force members and other bodies, and on the basis of these data it has appropriately concluded that no additional testing is necessary under the High Production Volume Chemical Challenge Program.

We would like to commend the Task Force for the fact that, in addition to including the three isomers/mixtures in a single category, it has utilized data from various other short-chain alkylbenzene compounds to cover the reproductive endpoints, on the grounds that these other compounds have similar structures, molecular weights, routes of metabolism, acute toxicity, and organ specificity. This utilization of data from related compounds constitutes a well-thought-out approach that demonstrates the Task Force's appreciation of the following statement in the October 1999 agreement among the EPA, industry, and health, environmental and animal-protection organizations:

2. Participants shall maximize the use of existing and scientifically adequate data to minimize further testing. ...
3. Participants shall maximize the use of scientifically appropriate categories of related chemicals and structure activity relationships.

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, MHS
Federal Agency Liaison
People for the Ethical Treatment of Animals

Richard Thornhill, PhD
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