The
Plastics
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April 26, 2001

Dr. C. W. Jameson
National Toxicology Program
Report on Carcinogens
MD EC-14
P.O. Box 12233
Research Triangle Park, NC 27709

Re: Tenth Report on Carcinogens: Nomination of Talc

Dear Dr. Jameson:

The Society of the Plastics Industry (SPI), Inc. appreciates the opportunity to submit these comments and urges NTP and the Department of Health and Human Services to support the recommendation of the Subcommittee of the NTP Board of Scientific Counselors *not* to list non-asbestiform talc in the 10th Report on Carcinogens (ROC). 66. Fed. Reg.13334 (March 5, 2001)

Founded in 1937, The Society of the Plastics Industry, Inc. is the trade association representing one of the largest manufacturing industries in the United States. SPI's 1,500 members represent the entire plastics industry supply chain, including processors, machinery and equipment manufacturers and raw material suppliers. The U.S. plastics industry employs 1.5 million workers and provides $304 billion in annual shipments. For more information visit SPI on the Web at www.plasticsindustry.org.

SPI's member companies use talc as a raw material in their manufacturing processes and, therefore, have a substantial interest in its potential listing. Consequently we have followed closely the proceedings of the 10th ROC.

SPI supports the recommendation of the NTP Board Subcommittee *not* to list talc as reasonably anticipated to be a human carcinogen. The Subcommittee's decision is based in part on a record containing sound scientific evidence from leading experts in industry, academia, and the Federal government that non-asbestiform talc does not pose a carcinogenic risk. Collectively, the data demonstrate that non-abestiform talc does not meet the statutory listing criteria for substances known or reasonably anticipated to be a human carcinogen and to which a significant number of people are exposed.

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Therefore, SPI urges the NTP Executive Committee to affirm the recommendation of the NTP Board Subcommittee and reject the nomination to list non-asbestiform talc in the 10th ROC.

Respectfully submitted,

Donald Duncan
President

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