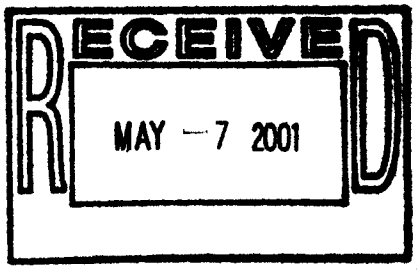
SCIENTIFIC ASSOCIATION OF EUROPEAN TALC INDUSTRY **EUROTALC**



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Brussels, 2 May 2001

Subject: **NTP 10th Report on Carcinogens - proposal to list talc not containing asbestiform fibres. Federal Register notice 5 March 2001.**

Dear Dr Jameson,

From our understanding of the process for the fourth Review, the one by the NTP Executive Committee, we are very concerned that the case for not listing "talc not containing asbestiform fibres" might fail to get adequate and fair consideration. This is not a critisism of the process, but as you are aware, major criticisms were formulated on the draft Background report, which were detailed in our written submission for the third Review.

Superficially, it appears that the votes of the committees stand at 2 to 1 in favour of listing. However, our view is that **the votes of RG1 & 2 cannot be considered valid as they were founded on incorrect evidence** as contained in the Background report. Experts in all the disciplines addressed condemned this document. All "juries" have to vote according to the evidence: presented with incorrect evidence they will arrive at an incorrect verdict.

When the third Review was carried out by independent scientists, with the benefit of many of the world's leading experts making written and verbal contributions to the process, the vote was strongly against listing "talc not containing asbestiform fibres" as a reasonably anticipated human carcinogen.

We therefore urge the NTP, in summarising the outcome of the first three reviews for the 10 or so Agencies that make up the Executive Committee, to set aside the votes of RG1 & RG2 and concentrate on the well-informed deliberations of the Board of Scientific Counselors, including the expert submissions from the public consultation.

We thank you for the opportunity to be involved in this Review process.

Yours sincerely,

Dr Michelle Wyart Remy
Secretary General

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