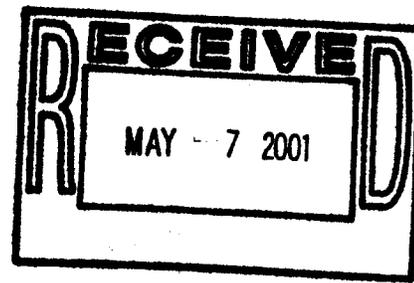




**RUBBER**  
manufacturers  
association



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May 7, 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 (ROC) Nomination: Public Comment  
"Talc - Asbestiform and Non-Asbestiform"**

Dear Dr. Jameson:

Thank you for the opportunity to submit comments regarding the above subject. Our members use talc (both forms) in their manufacturing processes and have a substantial interest in its potential listing.

The Rubber Manufacturers Association (RMA) is the national trade association for the tire and rubber products industry, an \$80 billion manufacturing sector employing more than 650,000 people in the United States. RMA represents more than 125 companies manufacturing a wide variety of rubber products. These members include every major tire manufacturer in the U.S. as well as manufacturers of other rubber products including automotive hoses, belts, and tubes.

Upon examination of the record and the comments submitted to the NTP Board of Scientific Counselors, the RMA believes the listing of talc with or without asbestiform fibers in the 10<sup>th</sup> ROC as a known or probable human carcinogen is not supported. In particular, our review of the record shows considerable confusion in regard to the "talc - containing asbestiform fibers" portion of the nomination.

As noted in the record, if this nomination is intended to mean talc containing asbestos, there would be no need for the nomination since asbestos is already listed as a known human carcinogen. If the nomination is intended to mean "nonasbestos - asbestiform fibers" then the totality of health as well as exposure evidence (that suggests little to no exposure) argues against inclusion. The record does suggest that the rare "nonasbestos - asbestiform fibers" presumably at issue exhibit different physicochemical properties which lead to biological outcomes different from those of asbestos. In short,

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there is no compelling health evidence in the NTP record that supports treating all minerals that grow in an asbestiform habit as asbestos.

The RMA believes that cancer classifications of each individual substance and agent must be based on sound science and solid scientific studies, or the credibility of all classifications is lost. We urge the NTP Executive Committee to reject the nomination to list talc with or without "asbestiform fibers" in the 10<sup>th</sup> Report on Carcinogens based upon the evidence before it.

Sincerely,



Kim Pregartner Weber  
Director, Government Affairs