



Styrene Information and Research Center (SIRC)

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Feb. 9, 2009

**Styrene Information and Research Center
Tells NTP Board of Scientific Counselors that Draft Substance Profile on Styrene
Does Not Support “Reasonably Anticipated” Classification**

The Styrene Information and Research Center (SIRC) has told the National Toxicology Program (NTP’s) Board of Scientific Counselors (BSC) that the science reflected in the NTP’s Draft Substance Profile on styrene does not support listing styrene as “reasonably anticipated to be a human carcinogen” in the NTP’s *12th Report on Carcinogens (RoC)*.

SIRC expressed its viewpoint in extensive formal comments submitted Feb. 6, 2009, to Dr. Barbara Shane, executive secretary for BSC. The NTP issued the Draft Substance Profile on styrene Dec. 24, 2008, and the BSC is scheduled to review it during a public meeting on Feb. 24, 2009.

Styrene was nominated in 2004 for possible reference in the *RoC*. Then in July 2008, the NTP proposed a “reasonably anticipated to be a human carcinogen” listing based on limited evidence of carcinogenicity in humans, sufficient evidence of carcinogenicity in experimental animals, and supporting mechanistic data. The BSC is charged with determining whether the Draft Substance Profile that the NTP has put forward is technically correct and supports the “reasonably anticipated” classification in accordance with the NTP’s classification criteria.

SIRC Executive Director Jack Snyder stated that the association’s comments “will show the Draft Substance Profile on styrene CANNOT be found to be technically correct and supportive of the classification because:

- “The human data do not provide ‘limited’ evidence of styrene’s potential carcinogenicity; in fact, there is no evidence of a causal relationship between styrene exposure and cancer in humans...
- “Animal studies do not present ‘sufficient’ evidence of styrene’s potential carcinogenicity; in fact, they provide only *limited* evidence of carcinogenicity...
- “The draft profile asserts that styrene’s mode of action is relevant for humans; in fact, available data do not support genotoxicity through styrene 7,8-oxide as the mode of action for mouse lung tumors...

- “The BSC has not been informed of this evidence by the Draft Substance Profile because it inexplicably deviates from accepted scientific practice” (in various ways detailed in the comments).

“Thus, the BSC is being asked to review a Draft Substance Profile that cannot be considered complete. Instead, the carcinogenicity of styrene must be judged by the BSC using both the Draft Profile AND the larger body of science on styrene, which is presented only in these and other public comments,” Snyder continued.

“We realize that this situation greatly complicates the task of the BSC. However, this effort is vitally important because the BSC is the last peer review in the *RoC* process. The health of our workers and neighbors, and the health of our industry itself, depends on the BSC’s conducting an independent and thorough review of the NTP staff’s proposal to classify styrene as ‘reasonably anticipated.’ We believe that such a review will find no valid justification for listing styrene in the *Report on Carcinogens*.”

Snyder added: “We believe that if the NTP were to move forward to list styrene in the 12th *RoC*, it would be based on a misuse of published data, and a straightforward effort to ignore all data which contradict its selectively crafted conclusion that styrene is ‘reasonably anticipated’ to be a carcinogen.”

The *RoC* is a congressionally mandated listing of “known” and “reasonably anticipated to be” human carcinogens; the Secretary of Health and Human Services delegates its preparation to the NTP. *RoC* listings carry no automatic regulatory implications, but frequently are cited in regulatory decision-making.

(SIRC’s full February 6 comments to the NTP Board of Scientific Counselors, separate SIRC statements on NTP process shortcomings, generally, and SIRC’s correspondence to and from the NTP since the process began are available by request to SIRC communications advisor Joe Walker, walkercom2@aol.com or 703-491-3301.)

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