



Styrene Information and Research Center (SIRC)

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**Styrene Information and Research Center Statement:
Federal Advocacy Program on National Toxicology Program Handling of Styrene**

The Styrene Information and Research Center (SIRC) is working along with other trade associations whose members rely on styrene to enlist the support of Congress and members of the Executive Branch to persuade the Secretary of Health and Human Services (HHS) to defer the National Toxicology Program's (NTP's) review of styrene until after publication of the 12th *Report on Carcinogens (RoC)*, due late in 2010.

In response to this outreach effort, 36 members of Congress wrote to HHS Secretary Kathleen Sebelius on April 21, 2010, asking for a full re-review of all the scientific data regarding styrene, including recently published studies and the results of new studies currently in process, when styrene is considered for the 13th *RoC*. The letter¹ is signed by 16 Democrats and 20 Republicans. Also, Reps. G.K. Butterfield (D-N.C.) and Steven C. LaTourette (R-Ohio) wrote separately to the HHS Secretary to express their concerns about the NTP styrene review.

Additionally, SIRC Executive Director Jack Snyder wrote on May 13 to Cass Sunstein, director of the White House Office of Information and Regulatory Affairs (OIRA), describing serious shortcomings in the NTP's *RoC* process, and asking Sunstein to (1) recommend that Secretary Sebelius delay the styrene listing until the 13th *RoC*, and (2) work with the HHS secretary to bring the NTP review process into conformity with White House directives².

And in a letter delivered July 12 to the offices of Sens. Tom Harkin (D-Iowa) and Michael Enzi (R-Wyo.), 281 styrene industry senior executives asked the senators to press the HHS Secretary to remove styrene from consideration for listing in the 12th *RoC*. Harkin and Enzi are, respectively, chair and ranking member of the Senate Health, Education, Labor and Pensions Committee.

In 2008, an NTP panel recommended without valid scientific justification that styrene be listed as "reasonably anticipated to be a human carcinogen" in the 12th *RoC*. Contrary to this proposed classification, which is based on an evaluation that excluded the latest science, the European Union's 2008 styrene risk assessment determined: "[B]ased on human studies, there is no

¹ Copies of the congressional letters referenced in this statement are available upon request to SIRC communications advisor Joe Walker, walkercom2@aol.com or 703-491-3301.

² A copy of SIRC Executive Director Jack Snyder's letter to OIRA Director Cass Sunstein is available upon request to SIRC communications advisor Joe Walker, walkercom2@aol.com or 703-491-3301

clear and consistent evidence for a causal link between specific cancer mortality and exposure to styrene.”³ And a peer-reviewed 2009 report by a panel of internationally recognized scientists found “no consistent increased risk of any cancer among workers exposed to styrene... The available epidemiologic evidence does not support a causal relationship between styrene exposure and any type of human cancer.”⁴

If finalized, this unwarranted NTP listing would imperil the styrene industry as a whole and particularly would threaten many small- and medium-sized companies primarily in the composites segment, resulting in the potential loss of half a million U.S. jobs in a time of economic turmoil.

SIRC partner associations participating in this advocacy effort include the American Composites Manufacturers Association and American Chemistry Council’s Plastics Foodservice Packaging Group, both located in Arlington, Va., and the National Marine Manufacturers Association, Washington, D.C.

Styrene-based products are part of the fabric of everyday life. They reinforce many of the newer bridges we drive on; insulate and protect the food we eat; guard the environment against acid rain and leaking underground gasoline tanks; increase fuel economy of cars and trucks; help produce wind and solar energy and insulate buildings, and have widespread use in the fabrication of medical devices.

The RoC is a congressionally mandated listing of “known” and “reasonably anticipated to be” human carcinogens; the HHS Secretary delegates its preparation to the NTP. RoC listings carry no automatic regulatory implications; however, they are cited frequently in regulatory decision-making. In addition, unwarranted NTP listings can cause unnecessary concerns among Americans who use products made from listed substances, or who may be exposed to the substances in workplaces or communities.

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³ European Union Risk Assessment Report, Styrene, CAS No: 100-42-5; EINECS No 202-851-5, *Draft for Publication, June 2008*, http://echa.europa.eu/chem_data/transit_measures/annex_xv_trans_reports_en.asp, and click on “styrene;” page 271 in the risk assessment report and section A.2.1 in the Annex XV Transitional Dossier.

⁴Published in the *Journal of Occupational and Environmental Medicine*, Volume 51, 2009, by Paolo Boffetta, M.D., M.P.H., International Prevention Research Institute, Lyon, France; Hans-Olav Adami, M.D., Ph.D., and Dimitrios Trichopoulos, M.D., M.S., Ph.D., Department of Epidemiology, Harvard School of Public Health, Boston, Mass.; Philip Cole, M.D., Dr.P.H., School of Public Health, University of Alabama, Birmingham, Ala., and Jack Mandel, Ph.D., M.P.H., Dalla Lana School of Public Health, University of Toronto, Ontario, Canada. The Styrene Information and Research Center provided funding for this independent review.