



November 18, 2008

Dr. Barbara Shane
Executive Secretary for the NTP BSC
NTP Office of Liaison, Policy and Review
NIEHS
P.O. Box 12233, MD A3-01
Research Triangle Park, NC 27709

Dear Dr. Shane:

On Thursday, October 2nd 2008 the Federal Register announced a meeting of the NTP Board of Scientific Counselors (NTP BSC) and requested comments on the recently nominated substances, the nomination rationale, and the preliminary study recommendations for these substances. The Soap and Detergent Association (SDA)₁ appreciates the opportunity to provide comments on proposed testing for triclosan for consideration by the NTP BSC.


Triclosan is safe and effective for its intended use as a non-prescription antibacterial ingredient in consumer products. The extensive data available on this substance confirms that the ingredient is effective and safe for humans and the environment when used as intended. On the basis of this data, triclosan is registered for uses around the world.

The NTP Summary of Nomination information states that the Food and Drug Administration (FDA) has not taken any action on triclosan since its 2001 dermal carcinogenicity assessment of triclosan. It is important to note that since 2001, FDA has received submissions that support the safety and efficacy of triclosan. It appears that information developed since 2001 may not have been fully reviewed. Therefore, SDA urges NTP to compile and review all available information before proceeding with decisions on the need for new testing, particularly in light of the NTP proposal to conduct animal testing.

SDA believes that the testing program proposed by NTP may not significantly impact the current safety profile of triclosan in light of the extensive preexisting safety package. SDA also believes the available studies are likely adequate to inform human health risk assessments for all routes of triclosan exposure from consumer products. However, we do recognize the need to fill data gaps when certain toxicological data is truly necessary to support the assessment of risk.

Should NTP proceed with the testing, it should accept comments and discussion on the proposed testing approaches to ensure that the testing leads to the development of data and information relevant to human exposures.

Sincerely,



Signature

Richard Sedlak
SVP Technical and International Affairs

¹ The Soap and Detergent Association (SDA) is a one-hundred plus member trade association representing the U.S. cleaning products market. SDA members include the formulators of soaps, detergents and general cleaning products used in household, commercial, industrial and institutional settings; companies that supply ingredients and finished packaging for these products; and oleochemical producers. SDA and its members are dedicated to improving health and the quality of life through sustainable cleaning products and practices. SDA's mission is to support the sustainability of the cleaning product and oleochemical industries through research, education, outreach and science-based advocacy.