



September 15, 2003

Dr. Scott A. Masten
Office of Chemical Nomination and Selection
NIEHS/NTP
P. O. Box 12233, MD A3-07
Research Triangle Park, North Carolina 27709

Rec'd 9/19/03

Dear Dr. Masten:

On behalf of the Association of Women's Health, Obstetric and Neonatal Nurses (AWHONN), I am pleased to submit comments to the National Toxicology Program (NTP) on two substances nominated for toxicological study. AWHONN, a membership organization of 22,000 nurses, promotes the health of women and newborns. AWHONN members are registered nurses, nurse practitioners, certified nurse midwives, and clinical nurse specialists who work in hospitals, physicians' offices, universities, and community clinics across North America as well as in the Armed Forces around the world. Because they interact with women at every stage of their lives, nurses play a critical role in health promotion. AWHONN is urging testing of the dietary supplement glucosamine as well as nanoscale materials.

Glucosamine, a widely consumed dietary supplement not recommended by the Food and Drug Administration, was recommended for study earlier this year by the Interagency Committee for Chemical Evaluation and Coordination (ICCEC). Glucosamine has been the source of relief for many Americans suffering from joint pain and has been accepted as relatively safe with respect to side effects compared to other dietary supplements and prescription drugs used to provide pain relief. However, a lack of data exists concerning the supplement's toxicity and carcinogenicity. Women of childbearing age are discouraged from taking glucosamine because so little is known about the effects on a developing fetus. Additionally, evidence suggests that the use of glucosamine may severely impede the body's ability to regulate blood glucose levels. AWHONN recommends the dietary supplement be accepted for further testing through the NTP. It is necessary to create a body of literature that allows health providers and patients the ability to make decisions on the use of glucosamine that includes information on serious side effects, toxicity and carcinogenicity.

Nanoscale materials are the product of a new revolutionary semiconductor technology. These materials are becoming more commonly used in health and beauty products like sunscreens and lotions in order to effectively reflect light, preventing sunburn and providing an attractive shimmer-like finish to the skin. As these types of products are primarily marketed to women of childbearing age, AWHONN recommends that nanoscale materials be considered for further toxicity testing. It is presently unknown if these particles may be harmful to women, particularly those of childbearing age. Scientific evidence shows that endocrine disrupting compounds are already commonly found in products marketed to young women, making this population category high risk for toxic exposure. AWHONN asserts that adding an additional unknown material, like the nanometer, increases the level of toxic risk to American women.

Glucosamine and nanoscale particles are considered revolutionary in that they are able to provide pain relief and increase product efficacy, respectively. As the popularity and presence of these products increase, there is a greater need for information about them. We recommend that further testing be done and formal recommendations be made with respect to these two substances. We believe that all consumers have the right to know the potential harm inherent in certain chemicals found in daily use products. The data gathered will only help citizens make more informed decisions that will enhance their health.

Thank you for the opportunity to submit comments on this important decision. For additional information contact Lisa M. Greenhill, AWHONN legislative manager, at 202-261-2402 or lisag@awhonn.org.

Sincerely,



Gail Kincaide
Executive Director