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ENVIRONMENTAL DEFENSE

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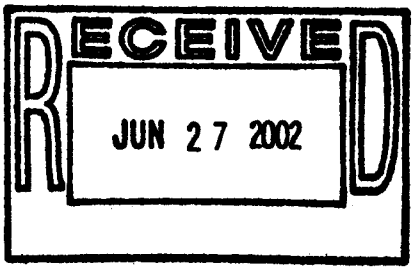
June 24, 2002



Dr C. W. Jameson
NIEHS
79 Alexander Drive, Bldg. 4401
P.O. Box 12233 MD EC-14
RTP, NC 27709

Dear Dr. Jameson:

We understand that the National Toxicology Program's next Annual Report on Carcinogens will include an update on lead and lead compounds. Environmental Defense strongly recommends that the evaluation of lead and lead compounds be considered in the context of both occupational and environmental exposures to lead, and not solely for occupational exposures. We base this recommendation on the following factors:

a. Environmental exposures to lead, especially among children, remain a significant environmental health problem in the US. Moreover, these exposures fall with disparate impact upon the poorest and most disadvantaged in our country.

b. The range of environmental exposures overlaps the range currently observed in workplace exposures.

c. Recent experimental evidence, by Waalkes et al, demonstrates that exposures to lead early in development are associated with increased tumorigenesis in mice, highlighting the need to consider children's exposures.

d. A new report by Lustberg and Silbergeld, currently in press in Annals of Internal Medicine, describes significant dose-related increases in risk of death caused by cancer among persons environmentally exposed to lead in the U.S.

e. There is no good scientific reason to assume that the risks of lead differ in kind between occupational and environmental exposures, either for different types of health effects (including carcinogenesis) or for different target organs. This is amply demonstrated in studies of lead-induced neurotoxicity and nephropathy.

f. The use of occupational cohorts to evaluate cancer risks, which are then extrapolated to nonoccupational exposures, is well established in NTP and IARC, and has formed the basis for assessing risks of many carcinogens, including benzene, polycyclic aromatic hydrocarbons, and dioxins. Since there is overlap of the ranges of occupational and environmental exposures, this extrapolation is scientifically defensible.

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Failure to consider environmental exposures, in the face of continuing evidence of widespread exposures among nonoccupational cohorts, especially children, does a major disservice to public health policy. Thus, we strongly urge that environmental as well as occupational exposures be considered in the upcoming update.

Sincerely,

Signature

John Balbus, MD, MPH
Environmental Health Program Director

Signature

Karen Florini
Senior Attorney