

## ***Advocacy Comments on the Department of Health and Human Services, National Toxicology Program's Report on Carcinogens***

On November 22, 2011, the Office of Advocacy (Advocacy) submitted a comment letter to the U.S. Department of Health and Human Services (HHS) discussing Advocacy's views on HHS' National Toxicology Program's (NTP) Report on Carcinogens (RoC). The comment letter was submitted during a request for public comment on the NTP's proposed RoC review process which closes on November 30, 2011. Advocacy's comment letter includes the following points:

- Advocacy shares small business concerns that a lack of rigorous scientific inquiry and methodology, procedural inadequacies, and the duplication of assessments will have a substantial, negative economic impact on their business. The placement of a chemical in a RoC has the potential to substantially stigmatize a chemical post-listing. Identifying a chemical's risk correctly is vital because the stigmatism may lead to substantial adverse economic impacts for small businesses that use that chemical.
- Advocacy welcomes the NTP's efforts to review the RoC process by inviting public comment, but does not believe that the proposed review process makes any substantial or necessary changes. In fact, the NTP's removal of peer review and public comment opportunities in the proposed review document will further hinder the RoC by decreasing the level of transparency.

For further information regarding this issue, visit Advocacy's website at: [www.sba.gov/advocacy](http://www.sba.gov/advocacy) or contact [Sarah Bresolin Silver](#) at 202-205-6790.