

Children's Health Protection Advisory Committee

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June 8, 2004

Michael Leavitt

Administrator

United States Environmental Protection Agency

1200 Pennsylvania Avenue

Washington, D.C. 20460

RE: Supplemental Guidance for Assessing Cancer Susceptibility from
Early-Life Exposure to Carcinogens

Dear Administrator Leavitt:

The Children's Health Protection Advisory Committee (CHPAC) commends the Environmental Protection Agency for addressing cancer risks associated with childhood exposures in the Supplemental Guidance for Assessing Cancer Susceptibility from Early-Life Exposure to Carcinogens. The Science Advisory Board (SAB) recently completed its scientific review of the Supplemental Guidance. Because the early years of life represent a period of vulnerability to carcinogens, the CHPAC is submitting the following recommendations.

The Committee urges that health risks related to childhood exposure be integral to all risk assessment and regulation at EPA. Risks from exposure to carcinogens during childhood and adolescence are addressed in a separate Supplemental Guidance, rather than being woven into the Guidelines for Carcinogenic Risk Assessment. Long-term, we recommend integrating the consideration of vulnerable life stages, including childhood and adolescence, into the primary guidelines.

Short-term, we recommend releasing the Supplemental Guidance concurrently with the Guidelines for Carcinogenic Risk Assessment, since the primary guidelines, if issued alone, would not adequately address the issue of early-life exposures. We also urge including in the primary guidelines clear references to the Supplemental Guidance, effectively incorporating the latter document into the primary guidelines.

June 8, 2004
Michael Leavitt, Administrator

The Committee notes the critical need for research on early life carcinogenesis, particularly in the areas of prenatal exposure and peri-pubertal exposure (when maturing sexual organs become vulnerable). While existing data on carcinogenesis following early-life exposure to mutagens need to be strengthened, research is particularly needed on carcinogenic chemicals acting through non-mutagenic mechanisms. We strongly recommend that research into the effects of early-life exposures to carcinogens be a priority for the Agency.

Given the importance of lifetime cancer risks associated with exposures during childhood, we commend the Agency's attention to early-life exposures to carcinogens and thank you for the opportunity to offer these recommendations.

Sincerely,



Melanie A. Marty, Ph.D., Chair
Children's Health Protection Advisory Committee

cc: Tom Gibson, Chief of Staff
Stephen Johnson, Acting Deputy Administrator
Paul Gillman, Assistant Administrator for Research and Development
Joanne Rodman, Office of Children's Health Protection
Bill Sanders, Acting Director, Office of Children's Health Protection