Congress of the United States Washington, DC 20515

May 11, 2011

The Honorable Kathleen Sebelius Secretary of Health and Human Services 200 Independence Avenue, SW Washington, DC 20201

Dear Secretary Sebelius:

We write to express our concerns about the current draft of the National Toxicology Program's (NTP) 12th Report on Carcinogens (RoC). We believe the draft runs a strong risk of furthering job uncertainty and confusion across a broad sector of American manufacturing. We respectfully ask that you delay issuing the styrene assessment until a thorough review can be conducted that weighs the full body of scientific evidence available to decision makers.

We understand that the draft *RoC* proposes to list the chemical styrene as "reasonably anticipated to be a carcinogen." Styrene-based products are used by Americans every day to reinforce bridges, insulate and protect food, guard air against acid rain, provide corrosion-resistant underground storage tanks, increase the fuel economy of cars, trucks and boats, and provide convenience and comfort in the kitchens and bathrooms of millions of homes across the country. Further, styrene-based components are a key part of renewable energy production, forming solar panels and wind turbine blades. **The production of styrene and styrene-based products accounts for up to 750,000 jobs across the nation in virtually every state and congressional district.** Manufacturing with styrene has provided good jobs and important products in our country for over 60 years.

In an April 21, 2010, letter to you, 36 House Members highlighted concerns with NTP's styrene review, including (1) a lack of proper peer review of critical novel scientific analyses; (2) lack of timely response to public comments which resulted in failure to inform NTP peer review groups of important scientific controversies; and (3) failure to fully consider all of the relevant scientific data. This letter also informed you of the recent findings of European Union scientists and a "blue ribbon" epidemiology panel, both of which concluded that styrene is not likely to cause cancer in humans.

If the NTP's 12th RoC goes forward as drafted, thousands of Americans working in the styrene-based products industry will face job uncertainty and potentially even job loss. NTP's disclaimer that it has no opinion about actual health risk regarding the substances listed in the RoC will almost certainly not counteract the plain language meaning of the phrase "reasonably anticipated carcinogen." In addition, the Occupational Safety and Health Administration warning regulations will commence sixty days after the release of the RoC. The resulting climate will make styrene-based businesses much more difficult to operate in the United States.

We strongly urge you to seek a more thorough review of the available knowledge on styrene before taking any action that ignores a large volume of strong science and significantly hinders American job growth.

Sincerely,

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