

# Children's Health Protection Advisory Committee

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March 28, 2003

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Christine Todd Whitman  
Administrator  
Environmental Protection Agency  
1200 Pennsylvania Avenue  
Washington, D.C. 20460

Dear Administrator Whitman:

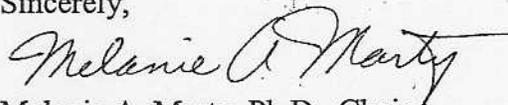
The Children's Health Protection Advisory Committee (CHPAC) understands the EPA is considering sponsorship of a National Academy of Sciences (NAS) study of the future of toxicity testing, likely in partnership with other Federal agencies and programs that use or create toxicological data (National Toxicology Program, Food and Drug Administration). The CHPAC believes that such a study, while broad in scope, could make a substantial contribution to the Agency's current and future efforts to improve child health risk assessment. Therefore, we strongly recommend the Agency sponsor the NAS study, and that the charge to the NAS panel be crafted with a strong emphasis on issues relevant to child health protection.

A recently completed 3-½ year study of toxicity testing guidelines by EPA's Risk Assessment Forum (RAF) concluded there are significant gaps in life stages considered, in organ systems studied, and in toxicological endpoints evaluated. The study made many recommendations for development of new or modified testing protocols. Many of these recommendations, if implemented, would impact either directly or indirectly the process of child health risk assessment. The NAS study would provide guidance to the Agency on how to best fill current gaps in knowledge and how to best incorporate exciting developments in fields such as genomics and proteomics into the risk assessment process. Improvements in the design, scope, and efficiency of toxicity testing will allow for the more timely generation of the sound scientific data necessary for the proper assessment of health risks to children and would reduce reliance on the use of protective uncertainty factors.

Properly charged, we believe that an NAS panel could help address many of the current deficiencies in toxicology testing and risk assessment relevant to

child health. The CHPAC believes that such a study deserves your strong support. Should this initiative move forward, we encourage the Agency to develop the charge to the NAS panel with an emphasis on needs relevant to child health protection. We also request the CHPAC be given an opportunity to assist in developing and/or commenting on the charge to NAS during the development process.

Sincerely,



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

Cc: J. Rodman, Acting Director, Office of Children's Health Protection,  
Office of the Administrator  
L. Blackburn, Acting Director, Office of Children's Health Protection,  
Office of the Administrator  
P. Gilman, Assistant Administrator, Office of Research and Development