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October 19, 2010

Via E-Mail and U.S. Mail

Dr. Joan Denton, Director
Office of Environmental Health Hazard Assessment
Post Office Box 4010
Sacramento, CA 95812

Dr. Dorothy Burk, Chair
and Members
Developmental and Reproductive Toxicant
Identification Committee
c/o Dr. Joan Denton, Director
Office of Environmental Health Hazard Assessment
Post Office Box 4010
Sacramento, CA 95812

Re: CERHR Petition

Dear Dr. Denton, Dr. Burk and Committee Members:

Thank you for placing the question of whether the Center for Evaluation of Risks to Human Reproduction (CERHR) should remain an authoritative body on the DART Identification Committee's Agenda for October 21, 2010. The Methanol Institute did not become aware of the American Chemistry Council's (ACC) petition to remove the NTP's CERHR from the list of bodies considered authoritative for reproductive toxicity issues until OEHHA posted the petition on its web site just recently. We understand that this issue will be raised "for discussion" and not a vote, and that the primary question before the Committee is whether to hear the petition and, if so, how to proceed. For the reasons below, we urge you to hear the petition.

Many of the concerns that the ACC petition expresses with respect to bisphenol-A also apply to the CERHR document concerning methanol. The CERHR document concerning methanol, for example, focuses more on risk quantification than on hazard identification, noting that "minimal" concern exists for reproductive toxicity of methanol in workplaces or in the diet. Yet, a listing of methanol that would result in warnings being required for workplace and dietary exposures deemed a minimal risk remains a distinct possibility if CERHR remains an authoritative body. Similarly, CERHR did not appear to grapple in detail with the question of whether methanol is or is not a reproductive toxicant in the absence of serious systemic toxicity.

We join the ACC in requesting that the DART Identification Committee substantively review the authoritative status of CERHR as soon as possible. We also request the Committee to suspend the status of CERHR as an authoritative body until the petition is resolved, so that no more listings based upon CERHR documents be made until the substantive review takes place.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Dolan". The signature is fluid and cursive, with the first name "Greg" being more prominent than the last name "Dolan".

Gregory Dolan
Executive Director
Americas/Europe