

201-14467

May 15, 2003

Christine Todd Whitman, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
Room 3000, # 1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

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Subject: Comments on the HPV Test Plan for Reaction Product or Corfree(R) MI

Dear Administrator Whitman:

The following comments on DuPont Company's test plan for the chemical Reaction Product, also known as Corfree(R) MI are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

The E.I. du Pont Nemours & Company, Inc. submitted its test plan on January 29, 2003 for the chemical Corfree(R) MI (CAS No. 72162-23-3), which is a mixture of dibasic acids with dodecanedioic acid (DDDA) as the largest component of this mixture. DuPont has submitted a comprehensive analysis of Corfree(R) MI, despite fairly limited toxicological data for this product. They have characterized the hazards associated with Corfree(R) MI by comparing it to toxicity data for DDDA. The similarities between Corfree(R) MI and DDDA have led DuPont to appropriately conclude that no additional testing is necessary under the HPV Challenge program.

We commend DuPont's efforts in drawing on available information from a variety of sources to meet the SIDS endpoints for the chemical Corfree(R) MI. This approach is consistent with the EPA's stated goals of maximizing the use of existing data in order to limit additional animal testing. Thank you for your attention to these comments. I may be reached at 202-686-2210, ext. 327, or via e-mail at meven@pcrm.org.

Sincerely,

Megha Even, M.S.
Research Analyst

Chad B. Sandusky, Ph.D.
Director of Research