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January 6, 2005

Michael O. Leavitt, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building, 1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

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Subject: Comments on the HPV Test Plan for 2-methyl-2-methylthiopropional oxime

Dear Administrator Leavitt:

The following comments on Honeywell's test plan for the chemical 2-methyl-2-methylthiopropional oxime 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.

Honeywell International, Inc. submitted its test plan on December 3, 2003, for the chemical 2-methyl-2-methylthiopropional oxime (CAS No. 1646-75-9), also known as aldicarb oxime. This chemical is used both as an intermediate in the production of the pesticide, aldicarb, as well as being an intermediate in the metabolism of aldicarb. We are pleased to see that Honeywell has employed the extensive database available on the toxicity of aldicarb oxime itself to meet almost all SIDS testing endpoints.

At this time, however, we strenuously object to Honeywell's proposal to conduct a developmental toxicity study on aldicarb oxime. Moreover, the sponsor did not mention which test guideline it intends to use to fulfill the SIDS endpoint for developmental toxicity. If the test method used is OECD 422, at least 675 mammals will be killed. If OECD 414 is carried out, more than 1,300 animals will be killed.

Although there are no available data on developmental toxicity of aldicarb oxime *per se*, a rich database is available on aldicarb and the carbamate class of pesticides in general. These chemicals are food use pesticides that have been extensively studied by the EPA, particularly aldicarb, a highly potent pesticide (a cholinesterase inhibitor) with an LD50 value of 1 mg/kg (<http://toxnet.nlm.nih.gov>). Aldicarb oxime is closely related to aldicarb (aldicarb oxime is both an intermediate and a metabolite of aldicarb) and the overall toxicity of this class of chemicals should be considered and no additional animal studies should be conducted. This approach not only saves the lives of many animals but also demonstrates a thoughtful analysis of the likely toxicity of this chemical based on previous experience with the carbamate class of pesticides.

We submit that in this instance, the entire knowledge of a chemical, including the extensive data available on aldicarb and its metabolites, should be used to determine further planned testing with aldicarb oxime. As indicated in both the October 1999 letter as well as the December 2000 *Federal Register* notice, HPV participants “*may conclude that there is sufficient data, given the totality of what is known about a chemical, including human experience, that certain endpoints need not be tested. As with all chemicals, before generating new information, participants should further consider whether any additional information obtained would be useful or relevant.*”

The toxicity of aldicarb has been studied for decades and although there may be differences in potency, additional animal testing on aldicarb oxime is not warranted in a screening level program such as HPV. We strongly object to Honeywell’s proposal to conduct a developmental toxicity study with aldicarb oxime simply to “check-the-box” for that particular SIDS endpoint. Additional animal testing will not affect how aldicarb oxime is handled nor result in further limits on worker exposure and risks as these are already controlled in the workplace.

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 Toxicology and Research