

201-14166



Michael Baraz
PETA

To: oppt.ncic@epamail.epa.gov, hpv.chemrtk@epamail.epa.gov, Rtk Chem/DC/USEPA/US@EPA, Karen Boswell/DC/USEPA/US@EPA, bchristianson@lawbc.com
cc: NAmerica-sales@merisol.com
Subject: Merisol USA to kill 1,700 animals in cruel, pointless tests

Chemical company **Merisol USA** has submitted two testing plans to the U.S. Environmental Protection Agency (EPA) that will kill more than 1,700 animals in obviously cruel and pointless tests. Your company's proposals blatantly violate the most minimal animal-welfare provisions of the EPA's high production volume (HPV) chemical-testing program. We are not fooled by this company's submission of these plans through a law firm in an apparent attempt to keep its identity and contact formation away from public scrutiny.

PETA explains the plans as follows:

- Merisol already has LD50 (lethal dose poisoning) test data on five of the six xlenol chemicals that it manufactures. Yet, instead of using those data, the company is planning to kill more animals in another LD50 test of an arbitrary and meaningless mixture of these six chemicals.
- In its test plan for ethylphenols, Merisol states up front that "no existing studies will be relied upon for HPV evaluations." In other words, Merisol apparently has access to existing data but is choosing to ignore them, preferring instead to run painful new LD50, reproductive, developmental, and genetic toxicity tests on animals.

The HPV program guidelines call for companies to use existing data wherever possible instead of conducting new tests. I urge that **these test plans are denied.**

This is ill-conceived and ill-planned. Do not let the EPA become an accessory to this planned crime.

Sincerely,

--

Michael Baraz
331 Shady Lane
Elmhurst, IL 60126

2002 DEC 27 PM 12:13