

Cinnamyl Derivatives – Comments of Environmental Defense

Submitted via Internet 6/13/01

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for cinnamyl derivatives.

Cinnamyl derivatives are proposed as a category. Recommendations on establishing categories of chemicals under the HPV program need to be carefully scrutinized because a permissive and scientifically weak approach could raise serious public health questions. Unfortunately, the justification for the proposed cinnamyl category is not convincing. It is supported primarily by limited metabolism information and less than adequate information on structure activity and physiochemical properties.

Most of the data is available for Cinnamaldehyde including NTP 14 and 90 day studies. In addition, the NTP is in the process of completing a 2-year study on Cinnamaldehyde in rodents. With this information in hand EPA, FDA and OSHA should have a solid database for hazard assessment of Cinnamaldehyde. This information will likely be useful in assessing the risks from other Cinnamyl derivatives but it is also likely that the derivatives will vary somewhat in their toxicological properties. Of greatest concern are possible reproductive effects, particularly in males based on the reported effects on spermatogenesis for CAS no. 80-54-6.

We recommend that a decision on the test plan for the Cinnamyl derivatives, other than Cinnamaldehyde, be postponed until the NTP study results are available.

Thank you for this opportunity to comment.

George Lucier, Ph.D.
Consulting Toxicologist, Environmental Defense

Karen Florini
Senior Attorney, Environmental Defense