

Comments on the HPV Test Plan for 3-Ethoxypropionic Acid Ethyl Ester

The following comments on the Eastman Chemical Company's and Dow Chemical Company's HPV test plan for 3-ethoxypropionic acid ethyl ester 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 nine million Americans.

The test plan and robust summary provide data for all the HPV SIDS endpoints, and the companies appropriately do not call for additional testing. We commend Eastman's and Dow's efforts in drawing on available information to meet the SIDS endpoints under the HPV program and support the conclusion that no further testing is warranted.

Thank you for the opportunity to comment.

Sincerely,

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