

Dr. Suhair Shallal, Designated Federal Officer
US Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460
Via E-mail: shallal.suhair@epa.gov

August 14, 2008

Dear Dr. Shallal,

I am writing to you to express the concern of SNF over the ongoing Acrylamide Review Panel. SNF is a major global producer of acrylamide.

We appreciate the opportunity that has been allotted to provide public comment for consideration by the SAB Acrylamide Review Panel (ARP) in its review of the draft acrylamide IRIS assessment. Our Industry submitted specific scientific and technical comments on the draft IRIS and ARP reports. To assist the ARP in understanding the comments submitted, our industry association, NAPPA, arranged for the authors of the comments to make presentations at the March 10 ARP meeting in Washington and during the July 16 conference call.

The ARP draft report contains what we believe to be a number of contestable statements in the responses to charge questions 18 through 21. We believe that these questions would be better addressed by persons with expertise in veterinary pathology. We encourage the ARP to seek help either from the expert pathologists who have submitted their opinions or from other experts prior to finalizing their draft report.

During the March 10 meeting that the ARP sought specific help from a member of the public, Dr. Kerry Dearfield, to aid their understanding with respect to his risk assessment model. Such *ad hoc* assistance in the area of veterinary pathology could well help resolve some of the opposing opinions referred to above prior to the finalization of the ARP draft report.

On the specific matter of whether mesotheliomas in the Johnson *et al.* study were a result of genotoxicity or another effect and on the question of the proper diagnosis of the brain lesions from the Freidman *et al.* study, the comments from Drs. McConnell and

Maronpot, both certified veterinary pathologists, offered opinions diametrically opposed to those of the ARP. We are concerned that the ARP has paid inadequate consideration to these public comments from eminent veterinary pathologists both of who were Branch Heads at NIEHS.

We feel that it is vitally important that a proper assessment of the comments from Dr. McConnell regarding the question of whether the pathological findings of the mesothelioma tumors support a genotoxic effect is conducted prior to the finalization of the SAB report because the ARP has used the fact that they believe this tumor to be characteristic of a genotoxic carcinogen to conclude that acrylamide is a genotoxic carcinogen. It should be documented to the public why the ARP, with limited or no supporting data, have chosen conclusions different to those reached by an eminent pathologist and former head of NTP.

Similarly, on the question of how to properly diagnose brain lesions the ARP has chosen an approach in stark contrast to comments from Drs. McConnell and Maronpot. We believe that it should be documented to the public on what grounds this stance has been taken.

Ideally, the diametrically opposing positions should be documented and resolved prior to the finalization of the ARP draft report.

Sincerely,

Dennis Marroni,

Global Head

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SNF Group of Companies

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