



AMERICAN COUNCIL ON SCIENCE AND HEALTH

1995 BROADWAY, 2ND FLOOR, NEW YORK, NY 10023-5860
TOLL FREE: (866) 905-2694 • TELEPHONE: (212) 362-7044 • FAX: (212) 362-4919
www.acsh.org • acsh@acsh.org

March 6, 2008

Dr. Sue Shallal
Designated Federal Officer
EPA Science Advisory Board

RE: CAS No. 79-06-1.

By email: shallal.suhair@epa.gov

Dear Dr. Shallal,

The comments below represent the position of the American Council on Science and Health (ACSH) with respect to the SAB Acrylamide Review Panel meeting to review the "IRIS Toxicological Review of Acrylamide."

ACSH is a consumer education consortium concerned with issues related to food, nutrition, chemicals, pharmaceuticals, lifestyle, the environment and health. ACSH is an independent, nonprofit, tax-exempt organization.

The nucleus of ACSH is a board of 350 physicians, scientists and policy advisors - experts in a wide variety of fields - who review the Council's reports and participate in ACSH seminars, press conferences, media communications and other educational activities.

In 2002, expert scientists associated with ACSH reviewed the then-available data on acrylamide and concluded that the data did not support a toxic or carcinogenic role for this compound in humans at the levels formed naturally in foods (please see attached document: "Acrylamide in Food: Is It a Real Threat to Public Health?"). In perusing the draft document under consideration by the Science Advisory Board, we noted that in Section 6, titled "Major Conclusions in the Characterization of Hazard and Dose Response," the primary references cited are studies of high-dose rodent studies (of acrylamide in water), and extrapolations from these are used to establish an RfD for humans. But, as the draft document notes (page 224) with respect to the possibility that acrylamide is a human carcinogen, "Evidence from available human studies is judged to be limited to inadequate."

Since many of the data cited predate our recent review, we ask that the SAB examine our review of the relevant data before establishing an RfD for acrylamide as it is found in cooked foods. We find that a compound that most likely has been present in foods since man first began to cook is extremely unlikely to present a significant threat to human health. While we acknowledge that high doses of acrylamide in water or via inhalation in occupational settings can have neurotoxic effects, we have found no support for the hypothesis that it can realistically be expected to pose a health threat at the levels found in foods.

It is our hope that the EPA will refrain from setting limits on the amount of acrylamide in foods as though it posed a real risk to human health. Such actions serve only to inflame unnecessarily the public's fears about a safe and healthful food supply and will do nothing to improve public health.

Thank you for your attention,

Ruth Kava, Ph.D., R.D.
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Gilbert L. Ross, M.D.
Executive and Medical Director

Elizabeth M. Whelan, M.P.H., Sc.D.
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