



IARC
150 Coers Albert Thomas
69372 Lyon
Cedex 06
France

October 27, 2005

The International Institute of Synthetic Rubber Producers, Inc. (IISRP) appreciates the opportunity to provide comments on the draft preamble. IARC has made a number of substantial improvements and we have acknowledged them in our attached comments. There are areas of concern and our scientists have addressed them constructively.

Particular concerns are:

- Consideration of a positive response in a second sex of an animal bioassay as “sufficient” evidence of carcinogenicity in animals.
- Apparent expansion of the IARC charter beyond hazard classification to include dose-response assessment.
- Ability to elevate a category 3 to a category 2B based solely on genotox/mechanistic data.
- Inclusion of abstracts in monograph discussions.

Perhaps it would be of value for IARC to set up an “expert meeting” to review the implications of these significant changes before incorporating them into the preamble. This has been done in the past and we encourage this process. We would be able to provide contributors to this “expert meeting” should IARC elect to use this tool.

Our detailed comments are attached and we are prepared to answer any questions you may have.

Thank you very much for this opportunity.

Sincerely,

James L. McGraw
IISRP
Managing Director & CEO