



July 17, 2018

Dear Representative,

On behalf of our millions of members and supporters, the Natural Resources Defense Council urges you to oppose the Chemical Assessment Improvement Act. Rather than improving EPA's information about toxic chemicals, this chemical industry supported bill would undermine the scope and reliability of EPA's chemical hazard assessments. It would replace the current robust, comprehensive and publicly vetted system with a fragmented and unprotective approach that will result in weaker protections from air pollution, contaminated drinking water and toxic chemicals in products.

The Chemical Assessment Improvement Act would dismantle EPA's Integrated Risk Information System (IRIS), which develops chemical hazard profiles using a credible and publicly vetted process that has earned it high praise from the Agency's Scientific Advisory Board and by the National Academies (NAS 2014; NAS 2018). Hazard is an inherent property of a chemical – that is, it doesn't change with changing context. Dynamite is explosive, asbestos causes cancer, mercury and lead are neurotoxic. This information is then paired with contextual information such as a site-specific superfund clean-up or a drinking water public health goal to generate meaningful risk estimates to protect the public.

With the IRIS assessment, regulators and others can ask many diverse questions relevant to individual EPA programs, non-regulatory programs, and even industry and non-government programs. Having a central IRIS Program to provide chemical hazard assessments to other EPA programs is thus a wise use of resources, avoids duplicating work, and most importantly – avoids incomplete or misleading assessments based on partial information or generated through a partial process. Dismantling IRIS would silo information and resources without ever completing a comprehensive chemical hazard profile, resulting in less information with which to protect the public.

The bill would take IRIS out of the EPA science office, and scatter its core functions among narrowly focused regulatory offices – exactly what the National Academies just cautioned against: “the IRIS teams involved in the systematic-review process should be independent of those involved in regulatory decision-making who use the products of the systematic-review teams. The committee notes that the current organizational structure of the IRIS program in the EPA Office of Research and Development is consistent with those best practices.” (NAS, 2018)

In fact, the Office of Chemical Safety and Pollution Prevention – under the direction of a former chemical industry lobbyist -- is already proposing systematic review methods that, if adopted would put a thumb on the scale in support of disregarding chemical hazards.

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Finally, the bill requires consideration of “third party assessments” – meaning industry evaluations of its own chemical products. But requiring consideration of the chemical industry’s self-assessments will not benefit EPA or the public. In fact, under President GW Bush the IRIS program did invite some third-party assessments (vinyl chloride, butadiene, styrene), and they all failed EPA review. The invitation was rescinded, and the EPA Science Advisor at the time was quoted saying that EPA staff was doing more work to try to fix the broken assessments than to generate them in the first place. “ [I]t is taking staff as much or more time to work with the outside parties as it does to develop in house toxicological reviews, [Paul] Gilman said. To date, the process has not saved the time or resources it was designed to save.” (Phibbs 2002; [Sass et al, 2005](#))

Americans deserve to be safe from harmful chemicals at work and at home. To achieve this, they need complete and credible information. The Chemical Assessment Improvement Act would rob the public of this vital information, undermine independence and introduce bias against regulating toxic chemicals into a system that should be protecting Americans. The House Science Committee should be following the recommendations of the NAS, not the chemical industry. We urge you once again to oppose this bill.

Sincerely

Jennifer Sass,
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Natural Resources Defense Council