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July 17, 2018

The Honorable Lamar Smith
Chair, House Committee on Science, Space, and Technology
2321 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Eddie Bernice Johnson
Ranking Member, House Committee on Science, Space, and Technology
394 Ford House Office Building
Washington, D.C. 20515

Dear Chairman Smith and Ranking Member Johnson:

The Union of Concerned Scientists, with more than 500,000 members and supporters throughout the country, strongly opposes proposed legislation to alter the chemical assessment process at the Environmental Protection Agency (EPA).

As drafted, the misleadingly named "Chemical Assessment Improvement Act" would eviscerate EPA's Integrated Risk Information System (IRIS) program, which conducts important risk assessments that represent the gold standard for chemical toxicity reviews. By essentially gutting the IRIS program through this ill-conceived legislative proposal, the committee would guarantee an information vacuum that would make it more difficult for federal, state, local, and international agencies to promulgate robust science-based public health policies and protections.

Shifting the work of IRIS from EPA's Office of Research and Development (ORD) to the program areas within the agency would decrease the relative independence and effectiveness of the office and could result in hazard assessments that are not fully inclusive of all routes of exposure. The environmental contaminants that IRIS reviews are typically not limited to one route of exposure, so placing the burden of reviewing chemicals in one program area, regardless of whether it is the Office of Water, Office of Air and Radiation, Office of Land and Emergency Management, or Office of Chemical Safety and Pollution Prevention, would likely result in a less than comprehensive toxicity review and assessment.

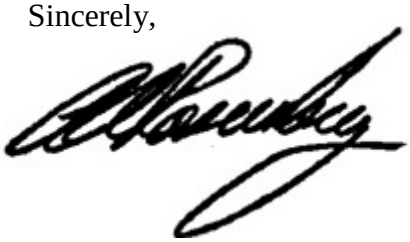
Further, Section 3 of this bill would introduce opportunities for a steering committee chaired by a political appointee at EPA to decide whether to employ a third-party assessment, and to choose the author of the assessment. This would politicize what should be a completely science-based process and could result in the reliance on these

studies rather than completing rigorous in-house reviews which is what is already being done by the IRIS program. While there have been reports of political interference at IRIS,[1] this proposal would exacerbate the politicization of the chemical assessment process at EPA. The current structure of IRIS allows its scientific work to be independent of the influence of political appointees, and the program should remain that way to be the most effective.

In addition, this bill aims to play up uncertainty in the science by emphasizing the need for non-linear approaches to dose-response modeling. This has been a long-standing goal of regulated industry and would result future chemical assessments that could downplay the health effects of toxic chemicals. The legislation, if passed, would also restrict the scientific studies that EPA can include in its hazard identification and dose response assessments to those that are publicly available and able to be replicated or reproduced. The concerns we have with these provisions echo those with the EPA's Strengthening Transparency in Regulatory Science proposed rule: it would make it significantly harder for EPA to use the best available science to protect the public.[2]

EPA's IRIS program has constantly been under attack by industry and some members of Congress. However, it is a program that has been and remains vital in ensuring science-based safeguards and deserving of your support. Its work has been recently recognized and commended by two independent scientific bodies, the National Academy of Sciences[3] and the EPA Science Advisory Board.[4] UCS supports the conclusions of the National Academy of Sciences, specifically that the IRIS program's current systematic review process is both scientifically rigorous and transparent and that its current organizational structure at ORD is appropriate to maintain its independence. We urge you to reconsider this misguided legislative effort that would effectively end the IRIS program as we know it and vote no on the misguided "Chemical Assessment Improvement Act."

Sincerely,



Andrew A. Rosenberg, Ph.D.
Director, Center for Science and Democracy
Union of Concerned Scientists

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[1] https://www.politico.com/story/2018/07/06/epa-formaldehyde-warnings-blocked-696628

[2] https://blog.ucsusa.org/andrew-rosenberg/the-epa-should-not-restrict-the-science-they-use-to-protect-us

[3] https://www.nap.edu/catalog/25086/progress-toward-transforming-the-integrated-risk-information-system-iris-program

[4] https://yosemite.epa.gov/sab/sabproduct.nsf/A9A9ACCE42B6AA0E8525818E004CC597/$File/EPA-SAB-17-008.pdf