

ENVIRONMENTAL PROTECTION NETWORK COMMENTS
“Application of Systematic Review in TSCA Risk Evaluation”
September 20, 2018

The U.S. Environmental Protection Agency has proposed changes to the systematic review process the agency uses in finding and assessing the studies it may consider in determining risks posed by chemicals. On June 11, 2018, the agency published draft guidance for the reviews, which are required by the Toxic Substances Control Act (TSCA). TSCA requires that EPA make decisions about chemical risks based on the “best available science” and the “weight of the scientific evidence,” which is defined as a systematic review method that uses a pre-established protocol to comprehensively, objectively, and transparently evaluate studies based on their strengths, limitations, and relevance. EPN believes that the new process to develop the TSCA systematic review process is seriously flawed.

The new process for the TSCA program described in the guidance is incomplete, has not been developed in a transparent manner with the scientific community, and departs significantly from accepted scientific principles for systematic review supported by the Institute of Medicine and adopted by the National Toxicology Program. It not only contains procedural irregularities, but would also result in eliminating important evidence of public health impacts from consideration or give these impacts only limited weight. Its use could result in accepted scientific findings about chemical risks and regulatory controls being reversed, and the weakening of public health and environmental protections.

Several critical steps are missing from the process of adopting the new TSCA systematic review approach. EPN describes how EPA failed to follow the proper procedures in developing this guidance and details critical flaws in the draft guidance. EPN also notes that EPA’s existing systematic review process developed for the Integrated Risk Information System (IRIS) and endorsed by the National Academy of Science has none of these flaws.

EPN strongly recommends the guidance not be applied to the risk evaluation of chemicals under TSCA or any other environmental statute until it has been properly evaluated and deemed as scientifically based as the systematic review process currently in use in the IRIS program.

To read EPN’s full public comments, please select the following link:

<https://www.environmentalprotectionnetwork.org/tsc-risk-comments/>

For more information: Contact EPN at info@environmentalprotectionnetwork.org or call 202-656-6229.