

Summary of Comments on Draft Pigment Violet 29 Risk Evaluation Under the Toxic Substance Control Act

January 14, 2018

On November 15, 2018, EPA [published](#) in the Federal Register a draft “TSCA Risk Evaluation for Colour Index (C. I.) Pigment Violet 29 (PV29),” a colorant primarily used in inks, paints, coatings, and plastics. EPA states that the purpose of this risk evaluation is to “determine whether a chemical substance presents an unreasonable risk to health or the environment under the conditions of use, including an unreasonable risk to a relevant potentially exposed or susceptible subpopulation.” EPN has the following comments on the draft Pigment Violet (PV29) Risk Evaluation Under the Toxic Substance Control Act (TSCA):

We believe the purpose of this evaluation is undermined for the following reasons:

- **Use of a Flawed Process:** EPA is not using an appropriate systematic review process or adequate public data and thus is not using best available science.
- **Insufficient Information:** EPN is concerned that EPA did not use its TSCA authority, under Sections 4 and 5, to get an appropriate release of key or critical information necessary to allow for the critical review of the study methods and conclusions.
- **Overlooked Pathways:** EPA has not conducted a sufficient review as required by law because it has failed to assess relevant exposure pathways for sensitive populations, including children.

As the first draft risk evaluation to be published, it is important to recognize and understand the flawed procedure used in this instance. It should not be repeated moving forward with the other nine risk evaluations -- or any others in the future. EPA should have a consistent procedure for conducting systematic reviews and conducting risk evaluations.

The [Environmental Protection Network](#) (EPN) is an organization comprised of over 350 EPA alumni (including scientists, policy specialists and others) volunteering their time to protect the integrity of US EPA (EPA), human health and the environment. We harness the expertise of former EPA career staff and confirmation-level appointees to provide an informed and rigorous defense against current administration efforts to undermine public health and environmental protections.

Read EPN’s full public comments: <https://www.environmentalprotectionnetwork.org/pv29-risk-evaluation-comments/>

For more information, contact EPN by email at info@environmentalprotectionnetwork.org or call 202-656-6229.

Media inquiries can be directed to press@environmentalprotectionnetwork.org or 202-656-6229.