

**EPN Comments on Candidates for Ad Hoc Participation
in the SACC Peer Review of the Draft Risk Evaluation for Formaldehyde**

Docket No.: EPA-HQ-OPPT-2023-0613

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The [Environmental Protection Network](https://www.epn.org/) (EPN) harnesses the expertise of more than 600 former Environmental Protection Agency (EPA) and other federal agency career staff and confirmation-level appointees from Democratic and Republican administrations to provide the unique perspective of former regulators and scientists with decades of historical knowledge and subject matter expertise.

EPN thanks the agency for the opportunity to provide comments on the candidates under consideration for selection as *ad hoc* peer reviewers assisting the Science Advisory Committee on Chemicals (SACC) with their peer review of the agency's evaluation of the risks from formaldehyde being conducted under the Toxic Substances Control Act (TSCA) Existing Chemicals Review program.

We are pleased that the agency has decided to conduct a full SACC peer review, in contrast to the letter peer reviews recently conducted/planned for the draft risk evaluations for tris(2-chloroethyl) phosphate (TCEP) and Asbestos Part 2. We agree that the agency should use the expertise of the standing SACC panel complemented by the *ad hoc* reviewers to fill in critical gaps in expertise for this risk evaluation review.

We suggest that the following areas of expertise should be enhanced and support the candidates listed below to serve as *ad hoc* reviewers:

- Ecological hazard - Wayne Landis
- Environmental fate and ecosystem exposure - Wayne Landis
- Human epidemiology - Bernard Goldstein and Patrick Breyse
- General/cancer toxicology - Samuel Cohen, Bernard Goldstein, and Judy Strickland
- Inhalation toxicology - Roger McClellan. However, we think that this area should be buttressed even further with an additional individual with broader and lengthier experience than others on the candidate list.
- Dose response/modeling/PBPK - Lisa Sweeney and Rory Conolly
- Statistics - Veronica Berrocal
- Occupational, consumer, and general population exposure - Patrick Breyse

We also wish to express strong reservations regarding the inclusion of multiple candidates from the same place of employment. This has created a heavy imbalance in representation in the pool of 28 candidates and concern about potential conflicts of interest, both actual and appearance of, given the nature of that organization. We recommend that the agency consider a variety of options to ensure a healthy and credible balance to the panel. Options include:

- Increasing the size of the panel by using members of the National Academies of Science, Engineering, and Mathematics and other similar organizations.

- Replacing some of the existing members where there is an appearance of conflict of interest with members of the National Academies of Science, Engineering, and Mathematics and other similar organizations.

We believe that by adopting either or some combination of both of these options would contribute significantly to both the quality and the credibility of the review.

We thank the agency again for the opportunity to provide feedback.