EPN and UCS Comments on the List of Candidates for EPA's Science Advisory Committee on Chemicals (SACC)
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The Environmental Protection Network (EPN) harnesses the expertise of more than 750 former Environmental Protection Agency (EPA) 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.

The Union of Concerned Scientists (UCS) is a member-supported nonprofit that puts rigorous, independent science into action to solve our planet's most pressing challenges and inspires and mobilizes people to advocate for a healthy, safe, and just world.

I. Introduction and Background

EPN and UCS appreciate the opportunity to comment on EPA's list of candidates for appointment to the Science Advisory Committee on Chemicals (SACC), which serves as the scientific peer review mechanism for the EPA's Office of Chemical Safety and Pollution Prevention.

These comments build upon EPN's prior submissions[1,2] regarding candidate lists for the Clean Air Scientific Advisory Committee (CASAC) and the EPA Science Advisory Board (SAB). As in those submissions, we do not comment on individual nominees, but instead evaluate whether the composition and attributes of the candidate pool, taken as a whole, are likely to support independent, credible, and mission-relevant scientific advice.

II. Role of the SACC Under TSCA

The SACC occupies a uniquely consequential position among EPA advisory committees. Established pursuant to the Frank R. Lautenberg Chemical Safety for the 21st Century Act, the SACC is charged with providing scientific and technical advice on chemical risk evaluations that directly inform the Toxic Substances Control Act (TSCA) determinations and subsequent regulatory actions, particularly in the Existing Chemicals Review Program.

Unlike purely advisory science bodies, SACC deliberations influence:

- Statutorily required determinations of unreasonable risk
- Risk management obligations imposed on regulated entities
- Public health protections for workers and other potentially exposed or susceptible subpopulations

[1] EPN Comments on Science Advisory Board Candidates for FY2026, available at https://www.environmentalprotectionnetwork.org/epn-comments-on-science-advisory-board-candidates-for-fy2026/.
[2] EPN Comments on Clean Air Scientific Advisory Committee Nominations, available at https://www.environmentalprotectionnetwork.org/epn-comments-on-clean-air-scientific-advisory-committee-nominations/.

Accordingly, standards for scientific independence, impartiality, and public confidence must be especially rigorous.

III. Selection Criteria in the Federal Register Notice

Consistent with prior comments on scientific advisory committees, we emphasize the following principles as essential to an effective SACC:

1. **Scientific Independence**: Members should be selected for their demonstrated scientific expertise, judgment, and integrity, rather than for representational purposes.
2. **Balance of Expertise, Not Stakeholders**: Committee "balance" should be understood in terms of scientific disciplines, methodologies, and perspectives, not as a balancing of economic or policy interests.
3. **Freedom from Conflicts of Interest**: Actual, potential, and structural conflicts of interest should be minimized - particularly where advisory work informs regulatory decisions affecting the member's employer, clients, or sector.
4. **Clear Distinction Between Scientific Review and Stakeholder Input**: Scientific peer review panels should not function as stakeholder forums; EPA has separate and well-established mechanisms for receiving stakeholder comments.

The Federal Register notice[3] announcing the request for nominations (January 5, 2026) identifies a range of criteria EPA indicates will be considered in appointing members to the SACC, including scientific expertise, experience, professional affiliations, and geographic location.

While we support EPA's emphasis on scientific and technical expertise, some of these additional criteria warrant careful scrutiny in the context of a science-based advisory committee:

- **Professional affiliation**, if interpreted primarily as a mechanism to balance stakeholder interests rather than scientific perspectives, risks introducing intentional partiality into scientific deliberations.
- **Geographic location**, while potentially relevant for outreach or representational bodies, is not a scientifically meaningful criterion for chemical risk assessment and should not be emphasized at the expense of expertise or independence.

Over-weighting such factors can create, at minimum, the appearance of a loss of impartiality, particularly when they predictably lead to increased representation of regulated-industry employees or consultants with regulated-industry clients on a committee intended to provide independent scientific review.

IV. Scientific Needs Identified in the Call for Nominations

The Federal Register notice appropriately identifies substantial scientific needs for the SACC, including expertise in:

- Human health and ecological risk assessment

[3] https://www.federalregister.gov/documents/2026/01/05/2025-24256/science-advisory-committee-on-chemicals-sacc-request-for-nominations

- Toxicology and pathology (including developmental, reproductive, neurotoxicology, carcinogenesis, and environmental toxicology)
- Exposure assessment and aggregate/cumulative exposure
- Epidemiology, pediatrics, and biostatistics
- Physiologically-based pharmacokinetic (PBPK) modeling
- Computational toxicology and bioinformatics
- Inhalation exposure and inhalation toxicology
- Occupational exposure and industrial hygiene
- Assessment of risks to women, children, and other potentially exposed or susceptible subpopulations

EPN's longstanding practice is to evaluate whether candidates free of conflicts of interest, taken collectively, are sufficient to meet these scientific needs. In the present case, this evaluative lens is particularly important given the policy and methodological transitions underway in EPA's chemical safety program.

V. Upholding Scientific Independence and Impartiality in the SACC

A fundamental concern with the SACC, as reflected in the SACC charter, is that the committee includes members designated as "representatives" of industry. While EPA may appropriately seek industry input to understand conditions of use or access proprietary data, embedding industry representatives within a scientific advisory committee reviewing risk evaluations creates conflict of interest with the committee's scientific role.

Members employed by or representing regulated entities whose chemicals or product categories may be affected by SACC advice face unavoidable institutional incentives that can influence:

- Selection and weighting of evidence
- Treatment of uncertainty and default assumptions
- Interpretation of hazard and dose-response information
- Exposure assumptions
- Characterization of risk significance

Such conflicts of interest can undermine confidence in the committee's advice and ability to remain impartial and unbiased, regardless of individual members' integrity. Unlike discrete financial conflicts, this form of conflict is **structural and ongoing**. When advisory committee members are representatives of regulated entities whose chemicals, product classes, or business practices may be affected by the committee's advice, EPA should consider that:

- Recusal from specific topics does not adequately address the problem, given the cross-cutting nature of TSCA risk evaluation methodologies.
- Disclosure alone does not mitigate the influence of institutional or professional incentives.
- Balance achieved by adding public-interest members does not neutralize the asymmetry created when regulated-industry representatives participate in deliberations framed as scientific peer review.

As a result, even well-qualified scientists serving in representative capacities can undermine the perceived and actual independence of the committee.

C. Blurring of Scientific Review and Stakeholder Consultation

The inclusion of industry representatives within the SACC also blurs the critical distinction between:

- **Expert scientific advisory committees**, whose role is to assess the strength, limitations, and implications of the science, and
- **Stakeholder processes**, through which regulated entities appropriately advocate for their interests and policy preferences.

Allowing industry representatives to participate as members of a scientific advisory committee:

- Creates a privileged forum for advancing stakeholder-favored interpretations of science,
- Risks reframing scientific uncertainty in ways that favor delay or less protective outcomes, and
- Weakens public confidence in the objectivity of risk evaluations.

EPA already provides multiple formal avenues for industry to submit data, analyses, and comments. These mechanisms are more appropriate venues for stakeholder engagement than membership on scientific advisory panels.

VI. Current Policy Context and Concerns about Scientific Balance

EPN and UCS are also mindful of the broader policy environment in which SACC appointments are being made. Recent EPA actions and statements emphasize accelerated elimination of animal testing and rapid transition to new approach methodologies (NAMs). While we support scientific innovation and ethical testing practices, such transitions must be grounded in validated methods capable of replacing the hazard identification and dose-response information provided by legacy approaches. However, recent actions affecting EPA's Office of Research and Development raise concerns about whether the Agency is maintaining the sustained scientific staffing, institutional capacity, and research infrastructure necessary to rigorously develop, validate, and implement NAMs at a scale sufficient to support TSCA decision-making.

In this context, it is especially important that the SACC maintain:

- Strong expertise in traditional toxicology and pathology
- Sufficient depth in epidemiology, exposure science, and PBPK modeling
- Methodological rigor when evaluating the readiness and limitations of NAMs

An overemphasis on representational balance or stakeholder affiliation, rather than scientific depth and independence, risks skewing committee advice during a period of significant methodological change.

VII. Implications for the Current Candidate List

We do not assess individual candidates. However, the candidate pool includes a substantial number of individuals whose current professional roles align with regulated industries or industry-funded consulting. EPA should therefore exercise particular care to ensure that:

- Appointees serving in representative capacities do not dominate scientific deliberations;

- The committee, taken as a whole, reflects independence rather than negotiated balance; and
- Scientific expertise aligned with the full scope of needs identified in the call for nominations is adequately represented among members free of conflicts of interest.

VIII. Scientific, Precedent, and Institutional Considerations

Our review of the candidate list indicates that EPA has before it a substantial pool of nominees who are free of disqualifying conflicts of interest and who, taken collectively, possess the breadth of scientific expertise identified in the Federal Register notice. Accordingly, the Agency has a viable path to constitute a scientifically robust, independent SACC that meets its statutory advisory obligations.

In evaluating the present SACC candidate list, we also note the importance of how EPA ultimately applies its stated selection criteria. In prior comments on CASAC and SAB nominations, we observed that candidate pools frequently included individuals with the breadth of scientific expertise necessary to constitute effective, independent advisory committees.

Recent experience with CASAC, however, illustrates that the existence of a scientifically robust slate does not, by itself, ensure outcomes that reflect EPA's stated commitment to scientific excellence and balance. Departures from longstanding practice, such as reduced emphasis on disciplinary expertise directly relevant to the committee's statutory charge, and increased emphasis on other criteria not central to scientific review, have raised concerns among the scientific community regarding both the credibility of the resulting advice and the appearance of a loss of impartiality.

Such outcomes not only undermine public confidence in advisory committees established by statute, but may also create avoidable legal vulnerabilities under the Federal Advisory Committee Act and the Administrative Procedure Act. In addition, because the Environmental Research, Development, and Demonstration Authorization Act assigns the SAB responsibility for reviewing the scientific and technical basis of Agency actions, weaknesses in the independence or balance of standing advisory committees that inform EPA decisions can have broader implications for the integrity of the Agency's science support framework as a whole. These considerations warrant careful attention as EPA moves from the SACC candidate list to final appointments.

IX. Recommendations

EPN and UCS respectfully recommend that EPA:

1. Give primary weight to scientific expertise, independence, and impartial judgment in appointing SACC members;
2. Avoid overemphasizing criteria such as professional affiliation or geographic location where they risk bias or the appearance of a loss of impartiality;
3. Re-evaluate the role of industry "representatives" to balance a committee responsible for independent scientific review rather than stakeholder consultation; and
4. Ensure that candidates free of conflicts collectively address the full range of scientific needs identified in the Federal Register notice.

X. Closing

The credibility of EPA's chemical safety decisions depends not only on the quality of the underlying science, but also on public confidence that scientific advisory committees operate independently and without undue influence. Addressing structural conflicts and selection criteria within this committee is essential to maintaining public confidence and ensuring EPA can fulfill its mission to protect human health and the environment.

EPN and UCS appreciate the opportunity to provide these comments.