

Advocacy Advises National Academy of Sciences Regarding EPA Chemical Assessments

On February 9, 2018, Advocacy wrote to the National Research Council (the operating arm of the National Academy of Sciences) regarding improvements to the Integrated Risk Inventory System (IRIS) that would benefit EPA and the scientific community. Small businesses are very concerned with the accuracy of scientific determinations made under IRIS since these chemical hazard assessments are often used in regulations promulgated by the agency and other regulatory bodies. The EPA IRIS program was tasked by an April 2011 NRC report on EPA's draft formaldehyde assessment to improve the scientific objectivity and transparency of these chemical assessments. The 2011 NRC report can be found [here](https://www.nap.edu/catalog/13142/review-of-the-environmental-protection-agencys-draft-iris-assessment-of-formaldehyde).

<https://www.nap.edu/catalog/13142/review-of-the-environmental-protection-agencys-draft-iris-assessment-of-formaldehyde>. Advocacy's letter to the NRC may be accessed at: https://www.sba.gov/sites/default/files/NRC_IRIS_Feb_9_2018_Comments.pdf.

- EPA announced its plans to improve IRIS through various procedural enhancements in July 2013. The NRC provided an initial review of EPA's implementation of these improvements in 2014. <https://www.nap.edu/catalog/18764/review-of-epas-integrated-risk-information-system-iris-process>. The agency asked the NRC to critique its more recent progress in a workshop earlier this month. Advocacy's comments were submitted to the NRC on February 9, 2018 for the NRC's use in formulating new recommendations for the report.
- The agency has created a world class system to perform a systematic review for chemical hazard assessments, including identification of study quality and criteria for selecting key studies for quantitative analysis. Advocacy applauds EPA's substantial achievements over this short period of time.
- While EPA does show an understanding of the final steps needed to complete the chemical hazard assessments, Advocacy believes that the agency has not yet demonstrated that these final steps can be successfully implemented. These final steps include making the judgments needed to evaluate study quality, select key studies, utilize expert judgment evaluating complex streams of evidence, and finally derive sound toxicity values.

- Advocacy recommends that NRC prioritize review of the EPA IRIS protocols handbook and chemical assessments, key documents that would show how close EPA is to implementing the final elements of the IRIS recommendations.

For more information, visit Advocacy's website at <http://www.sba.gov/advocacy>, or contact Assistant Chief Counsel Kevin Bromberg by email at kevin.bromberg@sba.gov or by phone at 202-205-6964.