

The Frank R. Lautenberg Chemical Safety for the 21st Century Act: Who is Providing Comments to EPA?

**A Report Prepared by Natalyn Daniels, February 21, 2017,
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<http://prhe.ucsf.edu/chemical-policy>

The Toxic Substances Control Act (TSCA) of 1976

- “Provides EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. Certain substances are generally excluded from TSCA, including, among others, food, drugs, cosmetics and pesticides.”

The New Law: The Frank R. Lautenberg Chemical Safety for the 21st Century Act

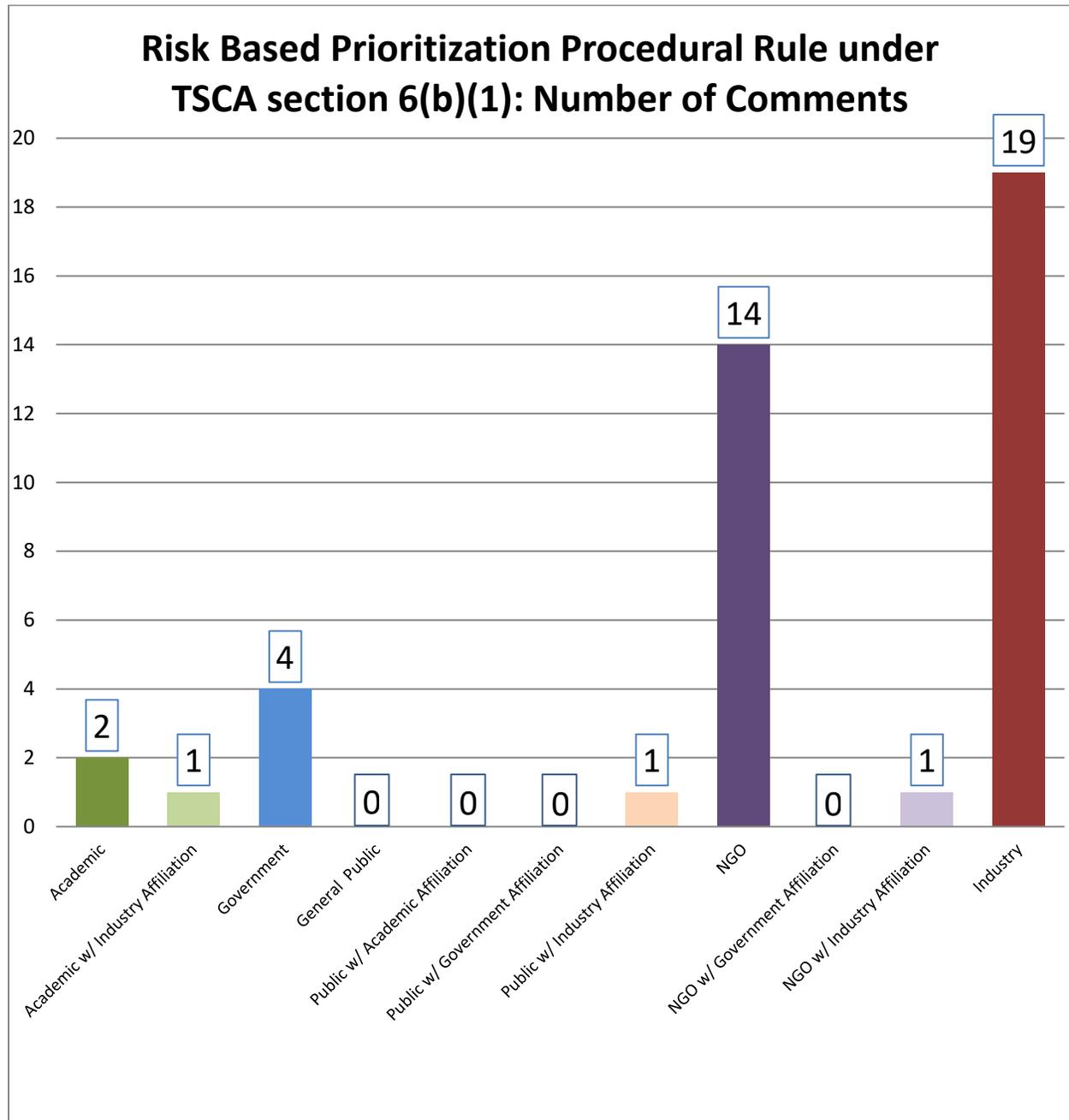
- Was signed by President Obama; went into effect on June 22, 2016
- Amends and updates TSCA

Our Questions

- Who provided input on the “New TSCA”?
- Which organizations commented?
- How many signees were there?
- What were the signees’ affiliations?

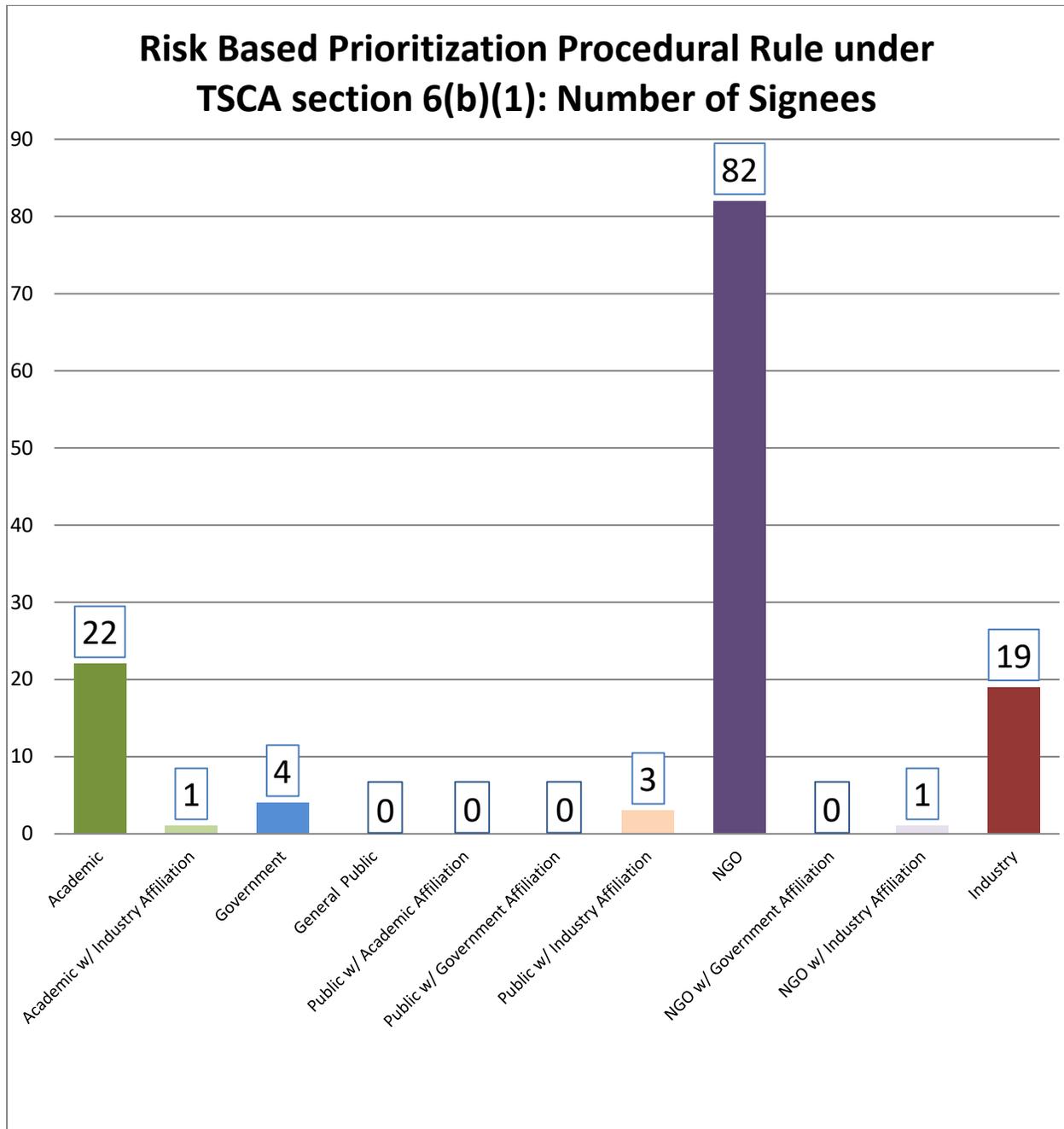
Risk Based Prioritization Procedural Rule under TSCA section 6(b)(1): Number of Comments

- Industry submitted the **most** comments (19/42, 45%)
- 1 of the 3 academic entities is industry affiliated (*University of California Center for Environmental Implications of Nanotechnology*)



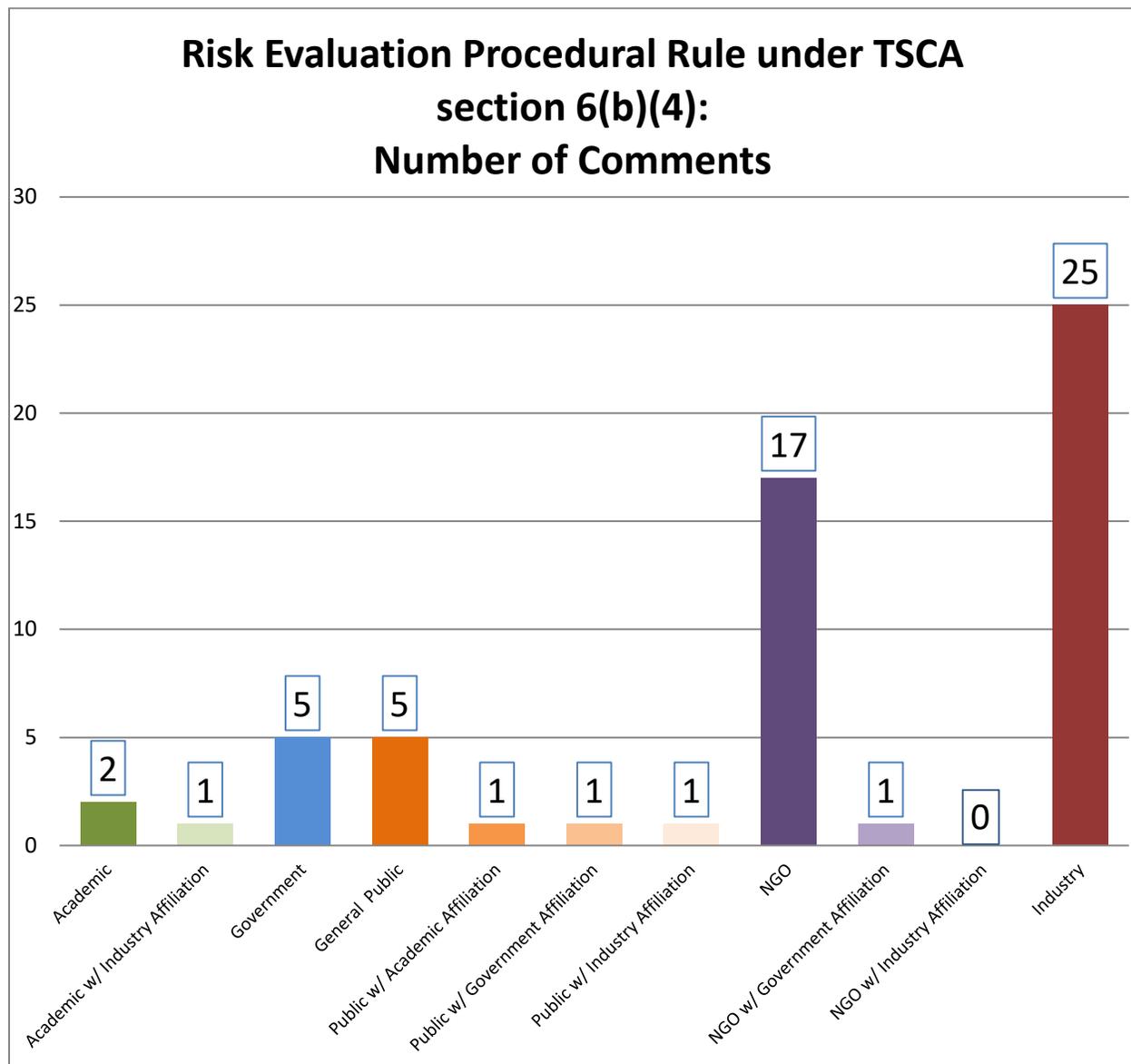
Risk Based Prioritization Procedural Rule under TSCA section 6(b)(1): Number of Signees

- While industry submitted the most comments, NGO's have the **most** signees (83, 64%)
- Academia has more signees than industry combined – **23** vs **19**
 - UCSF Program on Reproductive Health and the Environment's comment included 20 of the 23 academia signees
(http://prhe.ucsf.edu/sites/prhe.ucsf.edu/files/2016%2008%2024%20Comments%20on%20EPA%20prioritization%20process_final.pdf)



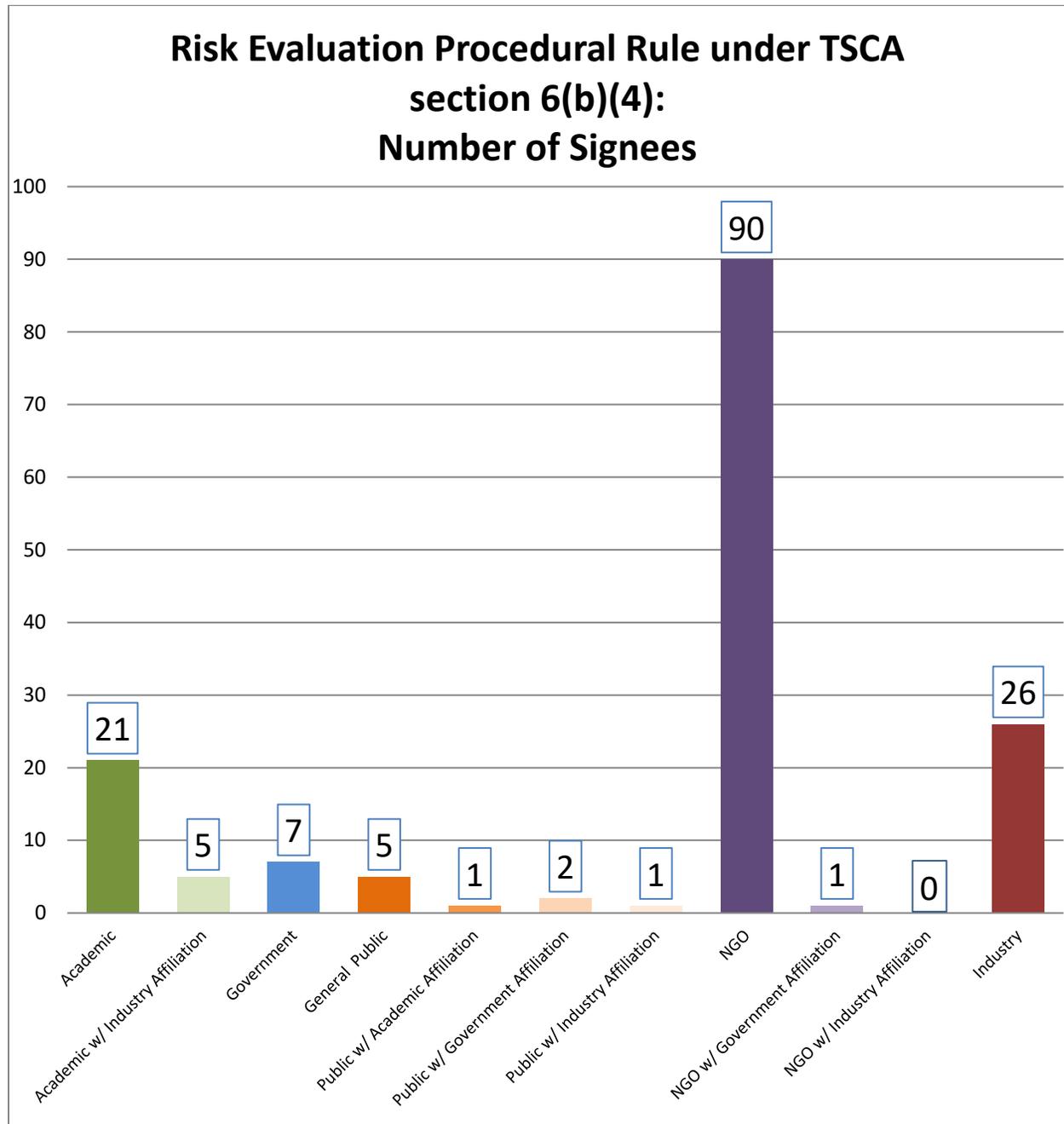
Risk Evaluation Procedural Rule under TSCA section 6(b)(4): Number of Comments

- Industry submitted the **most** comments (25, 42%)
- 1 of the 3 academic entities is industry affiliated (*Toxicology Excellence for Risk Assessment (TERA) Center at the University of Cincinnati, Department of Environmental Health, College of Medicine*)
- 3/8 of the general public comments mention artificial turf used in public parks and schools, suggesting that the *Safe Healthy Playing Fields Coalition, DC Metro Chapter* NGO may have been successful in recruiting individual members to write and submit comments to EPA

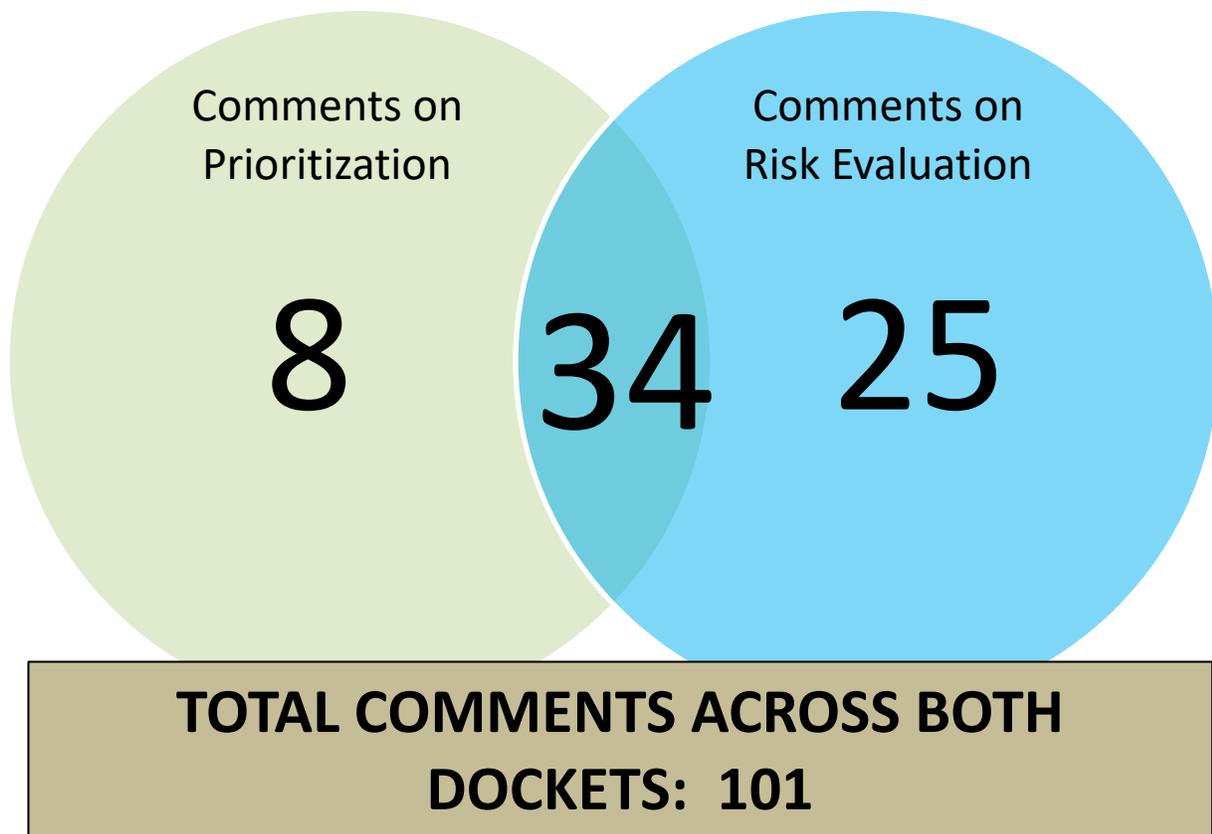


Risk Evaluation Procedural Rule under TSCA section 6(b)(4): Number of Signees

- While industry submitted the most comments, NGO's have the most signees (91, 57%)
- Academia has the same number of signees as industry – 26 vs 26
 - UCSF Program on Reproductive Health and the Environment's comment included 21 of the 26 academia signees
(<http://prhe.ucsf.edu/sites/prhe.ucsf.edu/files/2016%2008%2024%20TSCA%20Final.pdf>)



Who commented on both Risk Based Prioritization Procedural Rule under TSCA section 6(b)(1) Risk Evaluation Procedural Rule under TSCA section 6(b)(4)?



Acknowledgements

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- Hazel Tesoro compiled list of signatories as well as submitted the comments for both dockets to US EPA
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