University of California San Francisco



Obstetrics, Gynecology & Reproductive Sciences



Program on Reproductive Health and the Environment Department of OB/GYN & RS Mailstop 0132 550 16th Street, 7th Floor San Francisco, CA 94143 prhe@obgyn.ucsf.edu October 11, 2016

Nominations of candidates to serve on the EPA Science Advisory Committee on Chemicals (SACC)

EPA-HQ-OPPT-2016-0474 FRL-9950-66

Comments submitted to EPA-HQ-OPPT-2016-0474 and by email to Mr. Steven Knott, DFO, Office of Science Coordination and Policy (7201M); telephone number: (202) 564-0103; email address: knott.steven@epa.gov

The following comments are being submitted by the University of California, San Francisco (UCSF) Program on Reproductive Health and the Environment (PRHE). We declare that we have no direct or indirect financial or fiduciary interest in the manufacture or sale of any chemical that would be the subject of the deliberations of this Committee.

We appreciate the opportunity to provide comments on the nomination of members for the Science Advisory Committee on Chemicals (SACC), pursuant to section 2625(o) of the Frank R. Lautenberg Chemical Safety for the 21st Century Act. This panel will "provide independent advice and expert consultation, at the request of the Administrator, with respect to the scientific and technical aspects of issues relating to the implementation of this title" and will include "representatives of such science, government, labor, public health, public interest, animal protection, industry, and other groups as the Administrator determines to be advisable, including representatives that have specific scientific expertise in the relationship of chemical exposures to women, children, and other potentially exposed or susceptible subpopulations."

When selecting members, in addition to scientific expertise, differing perspectives, and breadth of collective experience, EPA is considering:

• Background and experiences that would contribute to the diversity of scientific viewpoints on the committee, including professional experiences in government, labor, public health, public interest, animal protection, industry, and other groups, as the EPA Administrator determines to be advisable (*e.g.*, geographical location; social and cultural backgrounds; and professional affiliations);

- Skills and experience working on committees and advisory panels including demonstrated ability to work constructively and effectively in a committee setting;
- Absence of financial conflicts of interest or the appearance of a loss of impartiality;
- Willingness to commit adequate time for the thorough review of materials provided to the committee; and
- Availability to participate in committee meetings.

In addition to this list, we would like to also encourage EPA to further consider:

- The role of the SACC in supporting the mission of EPA in protecting human health and the environment. As such, EPA has a professional and legal duty to select committee members who will provide credible and independent scientific analysis and advice free from conflicts of interest or a strong bias toward the perspective of regulated industries that may have a vested interest in minimizing EPA's regulation of hazardous materials and products.
- The need for transparent and effective disclosure policies that are strictly enforced. These disclosure and conflict policies play an essential role in protecting EPA and committee work products and must be strictly enforced to ensure the quality of SACC work products.
- The need for committee representation from directly impacted, susceptible, vulnerable, and/or highly exposed populations. We urge the Agency to not only seek "representatives that have *specific scientific expertise* in the relationship of chemical exposures to women, children, and other potentially exposed or susceptible subpopulations" (emphasis added), but to incorporate a broader and more inclusive definition to capture representation from individuals with diverse knowledge sources that represent unique perspectives to these critical issues. There are many examples of successful implementation of such approaches, which have demonstrated that incorporating knowledge resources outside of traditional academics and science fields can greatly enrich the research and policy process.¹

UCSF Nominations

We are pleased to nominate the following individuals for the SACC. We believe these individuals are extremely well-qualified for the SACC duties, with considerable experience and expertise that would contribute valuable service to the SACC in its mission to "provide advice and recommendations on the scientific basis for risk assessments, methodologies, and pollution prevention measures or approaches." Furthermore, we believe that these individuals fully meet the considerations listed above for SACC membership and would make critical contributions to the existing SACC membership. We are aware that EPA is soliciting nominations for five new SACC members; we are proposing ten exceptional candidates from which to select. Furthermore, we would like to strongly support the extension of current membership of Drs. Kris Thayer and Kenneth Portier to the committee, who represent excellent examples of the expertise and experience necessary in providing advice and consultation in a way that positively supports the Agency's overall mission to protect public health.

¹ Anderson, B.E., Naujokas, M.F. and Suk, W.A., 2015. Interweaving knowledge resources to address complex environmental health challenges. *Environmental health perspectives*, 123(11):1095-1099.

Nomination #1: Dr. Lauren Zeise

Dr. Zeise, Ph.D., is acting director of the California EPA Office of Environmental Health Hazard Assessment. She spent 3 years as Deputy Director for Scientific Affairs and 21 years as Chief of the Reproductive and Cancer Hazard Assessment Branch, which included managing the Proposition 65 program. Prior to OEHHA's creation, she was chief of the cancer unit at the California Department of Health Services and spent several years at the California Public Health Foundation and the U.S. Environmental Protection Agency. Dr. Zeise earned her doctorate from Harvard University with a thesis on "Surrogate Measures of Human Cancer Risk." She has served on numerous national and international science advisory committees and boards focusing on environmental public health and improving the way chemicals are tested or evaluated for health risk. These include more than 20 National Academy of Sciences (NAS) committees, numerous U.S. Environmental Protection Agency panels, and advisory committees for the World Health Organization's International Agency for Research on Cancer.

CONTACT INFORMATION Lauren Zeise, PHD California Environmental Protection Agency Office of Environmental Health Hazard Assessment Post Office Box 4010, Sacramento, CA 95812-4010 T 916-324-7572, E lauren.zeise@oehha.ca.gov

Nomination #2: Dr. Gina Solomon

Dr. Solomon, M.D., M.P.H. currently serves as Deputy Secretary for Science and Health at the California Environmental Protection Agency. Prior to joining CalEPA, Dr. Solomon was a senior scientist at the Natural Resources Defense Council and has been on the faculty in the Division of Occupational and Environmental Medicine at the University of California, San Francisco (UCSF) since 1997, where she still holds the title of clinical professor of health sciences. Dr. Solomon served as the director of the Occupational and Environmental Medicine Residency Program at UCSF from 2008-2012 and was the associate director of the UCSF Pediatric Environmental Health Specialty Unit from 2003-2009. Dr. Solomon has served on numerous scientific committees for the State of California, the U.S. Environmental Protection Agency, the National Toxicology Program, and the National Academy of Sciences. She is on the editorial board of the journal Environmental Health Perspectives, published by the National Institute of Environmental Health Sciences, and serves regularly as a peer-reviewer for numerous scientific journals. She has authored about 50 peerreviewed articles, a book published by the Massachusetts Institute of Technology Press, numerous reports, and chapters in several medical textbooks. Dr. Solomon received her bachelor's degree from Brown University, a Doctorate of Medicine from the Yale University School of Medicine, and a master's degree in public health from the Harvard School of Public Health. She is board-certified in both internal medicine and occupational and environmental medicine, and is licensed to practice medicine in California.

CONTACT INFORMATION Gina Solomon, MD MPH California Environmental Protection Agency Post Office Box 2815, Sacramento, CA 95812-2815 T 916-324-2568, E gina.solomon@calepa.ca.gov

Nomination #3: Dr. Christopher Portier

Dr. Portier is currently a Senior Collaborating Scientist with the Environmental Defense Fund. He has worked for over 30 years to identify the impacts of our environment on our health and find ways to better protect people from environmental hazards. Dr. Portier was previously employed at the National Institute for Environmental Health Sciences and the former lead of the National Center for Environmental Health. He is an internationally recognized expert in the design, analysis, and interpretation of environmental health data. His research efforts and interests include such diverse topics as cancer biology, risk assessment, climate change, bioinformatics, immunology, neurodevelopment, genetically modified foods, and genomics. He received his BS in mathematics from the Nicholls State University and his MS and PhD in biostatistics from the University of North Carolina, Chapel Hill.

CONTACT INFORMATION Christopher Portier, PHD MS Consultant with Environmental Defense Fund 1875 Connecticut Ave, NW, Suite 600, Washington, DC 20009 T 800-684-3322, E cportier@me.com

Nomination #4: Dr. Deborah Cory-Slechta

Dr. Cory-Slechta is a Professor of Environmental Medicine, Pediatrics and Public Health Sciences at the University of Rochester Medical School. She previously served as Dean for Research, Chair of the Department of Environmental Medicine and Director of the NIEHS Environmental Health Sciences Center at the University of Rochester Medical School, and as Director of the Environmental and Occupational Health Sciences Institute of Rutgers University. Her research has focused largely on environmental public health research, particularly in the area of developmental neurotoxicology. This work has included the effects of developmental exposures to metals, pesticides and air pollutants as well as combined exposures to metals and stress in animal models and human cohort studies and their impacts on brain and behavior. **Dr. Cory-Slechta received her BS and MA in psychology from Western Michigan University and her PhD in psychology from the University of Minnesota-Minneapolis.**

CONTACT INFORMATION Deborah Cory-Slechta, PHD MA University of Rochester Medical Center School of Medicine and Dentistry 601 Elmwood Ave, Box EHSC, Rochester, NY 14642 T 585-275-7060, E deborah_cory-slechta@urmc.rochester.edu

Nomination #5: Dr. Gary Ginsberg

Dr. Ginsberg is a Senior Toxicologist for the Connecticut Department of Public Health and a lecturer at the Yale School of Public Health. He has served on a number of national committees including US EPA's Science Advisory Board and the National Academy of Sciences (Biomonitoring committee, USEPA Risk Methods committee which produced Science and Decisions, Inorganic Arsenic Risk Assessment committee). He has also served on USEPA's Children's Health Protection Advisory Committee and has been an external reviewer on a number of USEPA IRIS documents. Dr. Ginsberg has been called on by other federal agencies to provide reviews including OSHA (silica workplace standard), CPSC (cadmium in children's jewelry) and FDA (dental amalgam). His risk assessments on fish contaminants, synthetic turf fields, acrylamide, cadmium, and assessments pertaining to risks in children and those with genetic polymorphisms have been published in peer review journals. Dr. Ginsberg received his PhD from the University of Connecticut.

CONTACT INFORMATION Gary Ginsberg, PHD Connecticut Department of Public Health 401 Capitol Ave, Post Office Box 340308, Hartford, CT 06134-0308 T 860-509-7750, E gary.ginsberg@ct.gov

Nomination #6: Dr. Tim Takaro

Dr. Takaro is a physician-scientist trained in occupational and environmental medicine, public health and toxicology, at Yale, the University of North Carolina and University of Washington. His research is primarily directed toward the links between human exposures and disease, and determining public health based preventive solutions to such risks. His work includes use of biological and other markers for medical surveillance, exposure assessment, and disease susceptibility with a focus on immunologic lung disease, human health and war, clinical occupational and environmental health and population resiliency in the health effects of climate change. Dr. Takaro received his BS in biology from Yale University, MSc in toxicology from the University of Washington, and MD/MPH in epidemiology from the University of North Carolina, Chapel Hill.

CONTACT INFORMATION Tim Takaro, MD MPH MSc Yale University, the University of North Carolina and University of Washington 8888 University Dr, BH 1130, Burnaby, BC V5A1S6 T 778-782-7186, E ttakaro@sfu.ca

Nomination #7: Dr. Ulrike Luderer

Dr. Luderer has been a professor in the Department of Medicine, Division of Occupational and Environmental Medicine at the University of California, Irvine since 2013 and was associate professor from 2006 to 2013 and assistant professor from 1999 to 2006. Dr. Luderer is currently a member of the Developmental and Reproductive Toxicant Identification Committee (DARTIC), a group of expert scientists appointed by the Governor to identify chemicals that have been clearly shown through scientifically valid testing according to generally accepted principles to cause reproductive toxicity. She was a senior postdoctoral fellow at the University of Washington Department of Environmental and Occupational Health Sciences from 1998 to 1999 and completed her fellowship in occupational and environmental medicine there in 1998. She is a member of the Society for the Study of Reproduction, the Endocrine Society, the Society of Toxicology and the American College of Occupational and Environmental Medicine. She is chair of the California Environmental Contaminant Biomonitoring Program scientific guidance panel and served on the U.S. Environmental Protection Agency Science Advisory Board, Environmental Health Committee, among other service on national and international advisory panels. She earned a Master of Public Health degree from the University of Washington and doctorate degrees in neurobiology and physiology and in medicine from Northwestern University. She is board-certified in occupational medicine and internal medicine.

CONTACT INFORMATION Ulrike Luderer, MD PHD MPH University of California, Irvine Center for Occupational and Environmental Health 100 Theory Dr, Suite 100, Mail Code: 1830, Irvine, CA 92617 T 949-824-8641, E uluderer@uci.edu

Nomination #8: Dr. Charles Plopper

Dr. Plopper has been professor emeritus at the University of California, Davis School of Veterinary Medicine's Department of Anatomy, Physiology and Cell Biology since 2005, where he has served in several positions since 1979, including chairperson, acting chairperson, professor, associate professor and assistant professor. Dr. Plopper is currently a member of the Developmental and Reproductive Toxicant Identification Committee (DARTIC), a group of expert scientists appointed by the Governor to identify chemicals that have been clearly shown through scientifically valid testing according to generally accepted principles to cause reproductive toxicity. He was a senior staff fellow at the National Institute of Environmental Health Sciences Laboratory of Pulmonary Function and Toxicology from 1978 to 1979, associate professor at the University of Kuwait Department of Human Morphology and Experimental Pathology from 1977 to 1978, assistant professor at the University of Hawaii John A. Burns School of Medicine's Department of Anatomy and Reproductive Biology from 1975 to 1977 and a visiting research morphologist at the University of California, Davis California National Primate Research Center from 1974 to 1975. Plopper was chief of the Electron Microscopy Division at the Letterman Army Institute of Research, Presidio of San Francisco from 1974 to 1975 and chief of the U.S. Army Medical Research and Nutrition Laboratory's Electron Microscopy Branch, Pathology Division from 1972 to 1973. He earned a Doctor of Philosophy degree in anatomy from the University of California, Davis.

CONTACT INFORMATION Charles Plopper, PHD University of California, Davis Department of Anatomy, Physiology and Cell Biology School of Veterinary Medicine Davis, CA 95616 T 530-752-1174, E cgplopper@ucdavis.edu

Nomination #9: Dr. Melanie Marty

Dr. Marty, Ph.D., was appointed as OEHHA's Acting Deputy Director for Scientific Affairs in May, 2015. Dr. Marty oversees the office's science division and provides scientific technical review of documents from all OEHHA programs. Dr. Marty has been at OEHHA since its inception in 1991. She previously served as Assistant Deputy Director for Scientific Affairs from 2012 to 2015. Before that, she was Branch Chief of the Air Toxicology and Epidemiology Branch from 1998 to 2012. She has served on many EPA peer review committees and was the Chair of the U.S.EPA's Children's Health Protection Advisory Committee from 2001 to 2009. Dr. Marty is also an Adjunct Assistant Professor at the University of California, Davis, Department of Environmental Toxicology. She received her Ph.D. from the University of California, Davis in Pharmacology and Toxicology.

CONTACT INFORMATION Melanie Marty, PHD California Environmental Protection Agency Office of Environmental Hazard and Health Assessment Post Office Box 4010, Sacramento, CA 95812-4010 T 916-324-7572, E melanie.marty@oehha.ca.gov

Nomination #10: Dr. Veena Singla

Dr. Singla is a scientist with NRDC's health and environment program. She works on creating healthier indoor and outdoor spaces by reducing and eliminating the use of toxic chemicals, especially those that pose hazards to vulnerable populations such as workers, pregnant women and young children. Current projects include research and policy initiatives on agricultural pesticides and chemicals of concern in consumer products. She leads work on groundbreaking policies which attempt to establish frameworks for safer chemical evaluation and substitution. Other areas of focus include indoor environmental quality and how exposure to multiple chemicals affects health outcomes. Prior to NRDC, she worked primarily on flame retardant chemicals as a senior scientist with the Green Science Policy Institute. Dr. Singla received her PhD in Cell Biology from University of California, San Francisco and her B.S. in Chemistry with High Honors from University of California, Berkeley. She was a postdoctoral teaching fellow at Stanford University and adjunct faculty at the University of San Francisco.

CONTACT INFORMATION Veena Singla, PHD Natural Resources Defense Council 111 Sutter St., 21st floor, San Francisco, CA 94104 T 415.875.6126, M 469.236.5549, E vsingla@nrdc.org

Thank you for the opportunity to provide comments and nominations. Please let us know if we can provide any additional information or be of further help.

Respectfully,

May Mul

Tracey Woodruff, PhD, MPH Professor and Director Program on Reproductive Health and the Environment Department of Obstetrics, Gynecology and Reproductive Sciences University of California, San Francisco

Juli Jam

Juleen Lam, PhD MHS MS Associate Researcher Program on Reproductive Health and the Environment Department of Obstetrics, Gynecology and Reproductive Sciences University of California, San Francisco