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Comments on EPA's Requests for Comments on the Experts Nominated to be Considered for ad hoc Participation and Possible Membership on Toxic Substances Control Act (TSCA), Science Advisory Committee on Chemicals (SACC)

Comments submitted via regulations.gov to the docket ID EPA-HQ-OPPT-2018-0605

The following comments are being submitted by the University of California, San Francisco (UCSF) Program on Reproductive Health and the Environment (PRHE). 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.

In summary, our comments address the following main points:

- 1. Support for the nomination of 18 individuals; and**
- 2. EPA should strive to eliminate or minimize financial conflicts of interest (COI- those with a financial interest or who profit from decisions) from selected committee members. In the event that financial COI exists, EPA should collect information from each and every SACC member in an effort for complete transparency regarding any financial COI that potentially bias members toward undervaluing the scientific information related to health effects of industrial chemicals. Any and all existing financial COI should be made explicit and transparent to the public.**

Background

We appreciate the opportunity to support qualified candidates to serve as ad hoc reviewers and potentially become members of the 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."

We encourage EPA to consider the following when considering nominations:

- **The role of reviewers and 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 and routinely addressed to ensure the quality of SACC work products.
- **The need for representation from directly affected, 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, 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. EPA has encouraged "citizen science" but then has then erected expertise barriers that essentially prevent those with expertise about impacted communities and with relevant work experience, but perhaps without certain credentials (i.e., holding a PhD) from taking part in critical discussions. 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

Support for Nominees

1. Support of the nomination of 18 individuals to serve in an ad hoc role and possible membership the TSCA SACC

We are pleased to support the following 18 candidates. We believe these individuals are extremely well qualified and meet the criteria, with considerable experience and expertise that would contribute valuable service to EPA.

1. Dr. Brad Black
2. Dr. Adam Finkel
3. Dr. Mary Fox
4. Dr. Robert Harrison
5. Ms. Kristin Hill
6. Dr. Adrienne Hollis
7. Dr. David Kriebel
8. Dr. Juleen Lam
9. Dr. Steven Markowitz
10. Dr. Celeste Monforton
11. Dr. Keeve Nachman
12. Dr. Heather Patisaul
13. Dr. Deborah Rice
14. Dr. Elizabeth (Lianne) Sheppard
15. Dr. Veena Singla
16. Dr. Kurt Straif

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.

17. Dr. Tracey Woodruff
18. Dr. Ami Zota

2. EPA should strive to eliminate or minimize financial conflicts of interest (COI- those with a financial interest or who profit from decisions) from selected committee members. In the event that financial COI exists, EPA should collect information from each and every SACC member in an effort for complete transparency regarding any financial COI that potentially bias members toward undervaluing the scientific information related to health effects of industrial chemicals. Any and all existing financial COI should be made explicit and transparent to the public.

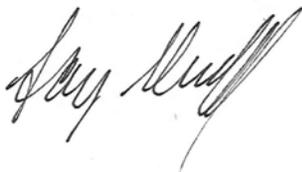
We strongly recommend that EPA select reviewers who represent support for the protection of human health and the environment, consistent with the mission of the Agency. As such, each selected committee member must be transparently vetted for any financial conflicts of interest that bias them in undervaluing the scientific evidence on health effects from exposure to hazardous chemicals, such as those working for or financially supported by industry.

In other public health regulatory situations, it is customary to set a health benchmark or risk assessment based only on health and scientific considerations and then to consider costs, lead time or market considerations in the risk management or implementation phase. This risk management phase would be an appropriate avenue for industry consultation and advisement to the Administrator. In this manner, industry members are given the opportunity to directly provide advice on considerations that impact their operations, but this structure would keep these economic considerations separate from the scientific risk assessment process.

In summary, we encourage EPA to ensure reviewers cover a wide breath of knowledge and experience from various relevant sectors who do not have a financial COI or whose financial COI is transparently and explicitly stated up-front. Our nominations include scientists, researchers, and health professionals from academia, government, and nonprofit organizations.

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

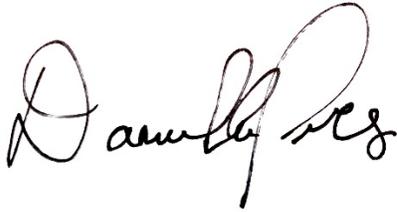
Respectfully,



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