



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

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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

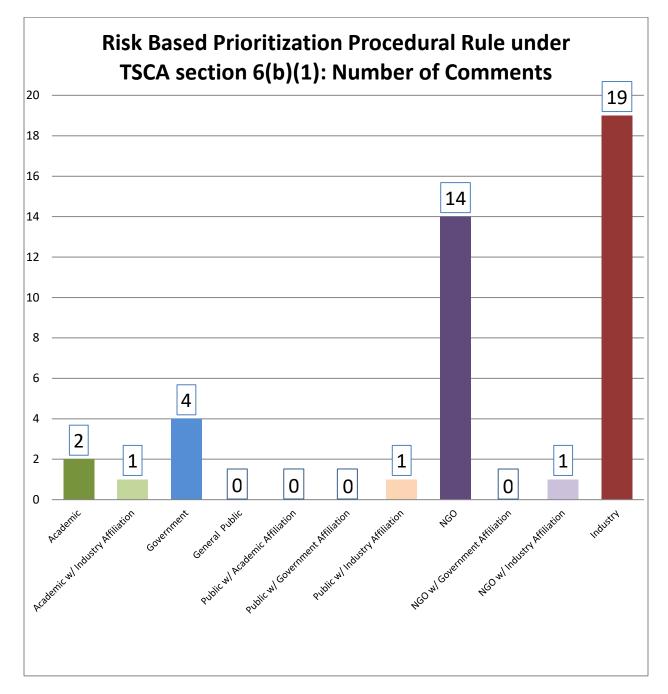
- Was signed by President Obama; went into effect on June 22, 2016
- Amends and updates TSCA

#### **Our Questions**

- Who provided input on the "New TSCA"?
- Which organizations commented?
- How many signees were there?
- What were the signees' affiliations?

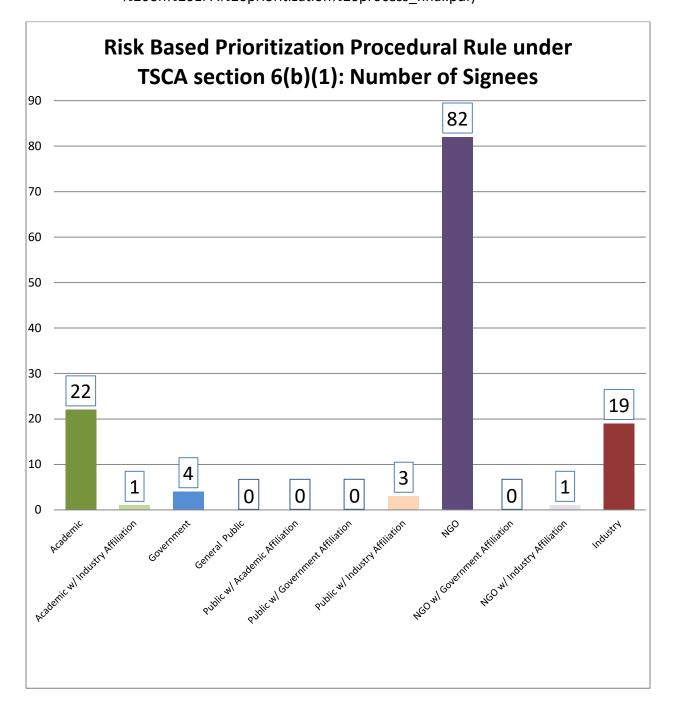
Risk Based Prioritization Procedural Rule under TSCA section 6(b)(1): Number of Comments

- 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)



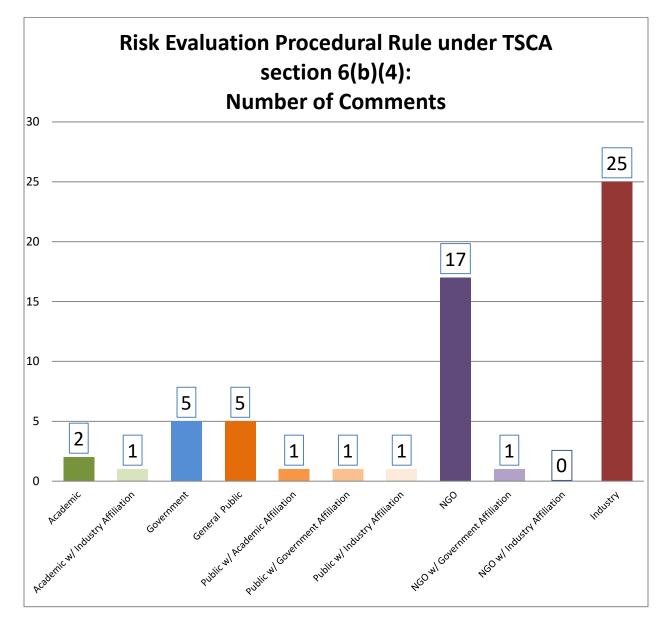
## Risk Based Prioritization Procedural Rule under TSCA section 6(b)(1): Number of Signees

- 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)



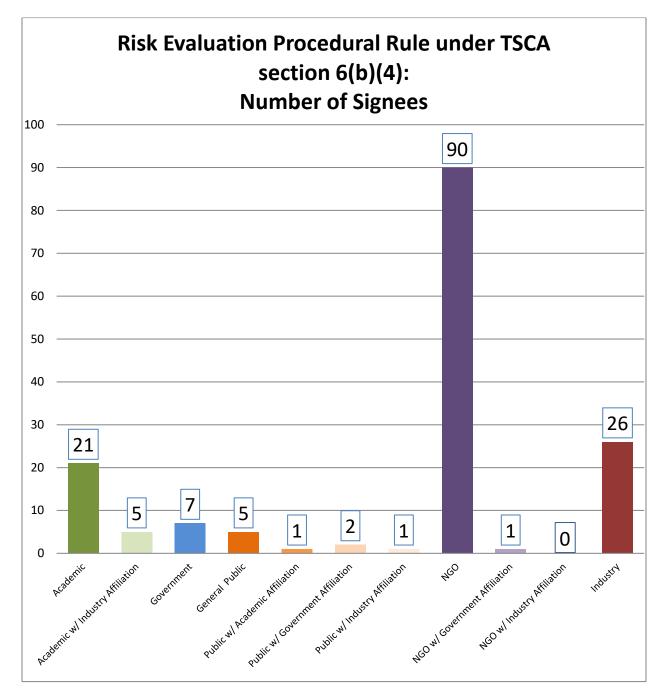
## Risk Evaluation Procedural Rule under TSCA section 6(b)(4): Number of Comments

- 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

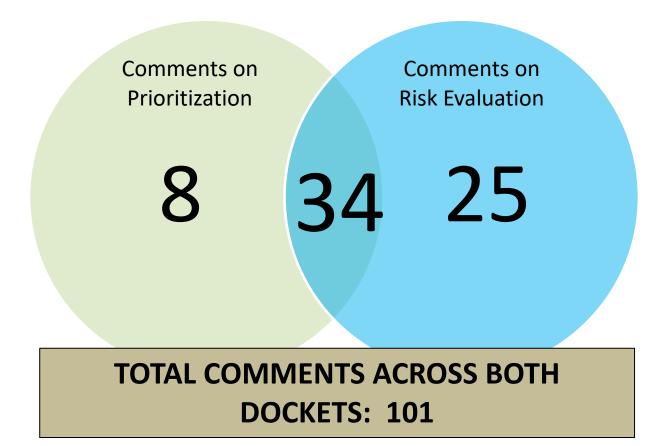


## Risk Evaluation Procedural Rule under TSCA section 6(b)(4): Number of Signees

- 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%20F inal.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

- Tracey Woodruff, Juleen Lam, and Patrice Sutton drafted the comments for both dockets
- Hazel Tesoro compiled list of signatories as well as submitted the comments for both dockets to US EPA
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