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.”


• 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)?

TOTAL COMMENTS ACROSS BOTH DOCKETS: 101
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- Hazel Tesoro compiled list of signatories as well as submitted the comments for both docket to US EPA.
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