

# **SIRC Remarks at EPA's August 9<sup>th</sup> Hearing on the TSCA Rule on Risk Evaluation**

*[Final version as edited at meeting to fit four-minute speaker time limit]*

My name is Jack Snyder, and I am the executive director of the Styrene Information and Research Center. Thank you for the opportunity to speak today as EPA begins the implementation of this important Act.

SIRC would like to congratulate EPA and all of the stakeholders for their work to secure the passage of the TSCA Modernization Act. There is a strong need for a robust Federal program that can separate out and manage the unreasonable risks potentially posed by various uses of chemicals, from the majority of other uses that are safe.

My comments focus on two approaches that SIRC hopes EPA adopts in the implementation of the new TSCA: first, to make good use of “crowdsourcing” in its approach to public participation and, second, a recommendation that, for the new TSCA, the Agency does not need to “reinvent the wheel” in terms of hazard and risk assessment options, as well as risk management options.

Relative to “crowdsourcing,” we know that the deadlines defined in the new Act will prove challenging for the agency to meet, in a timely fashion,

all that the Act requires. This means that EPA will need to use some common sense management skills to get its work done.

Some government programs may view public comment periods as time-consuming chores that are necessary because we live in a democracy, but that encroach on the time the agency needs to work on the rule. We want to suggest that a more modern, common sense approach to public participation is embodied in the now popular concept of crowdsourcing. If you ask them the right questions, the public -- including NGOs, companies, trade associations, and the larger scientific community -- can help you find relevant data that you may not know about. Crowdsourcing can help with early identification of key issues and potential concerns about a chemical, or its uses, that will need to be addressed in the Agency's work; issues that you may not otherwise hear about until it's time for peer review. In short, be innovative about -- and use -- public participation as a valuable resource to help achieve quality work on time.

Secondly, we urge EPA not to "reinvent the wheel" in implementing the new TSCA. We all know that the science and processes of risk assessment and risk management have been around for a long time, and have evolved over the years. As Dr. Henry noted, EPA itself has published many guidance documents, including the 2005 Cancer Guidelines, for example, which, while perhaps not perfect, are a good place to start. Another good example is the National Research Council's "Science and Decisions" report, that emphasizes the importance of risk evaluators communicating to risk

managers, and the public, the uncertainties associated with any risk evaluation. NRC's reasons for stressing this are well summarized on page 98 of their report. This recommendation, along with the recommendation in the Council's May 2014 report on the IRIS program -- that evaluators should present decision makers and the public with a range of values -- can be invaluable to risk managers who may be confronted with less than perfect choices regarding the best risk management approach to take. EPA should not be afraid to communicate to its risk managers and the public both what it KNOWS and what it does NOT KNOW about a chemical, thereby giving subsequent decision makers the broadest amount of information on which to make difficult risk management decisions.

In summary, we hope that the Agency will carefully provide for maximum public participation in the new processes, and that it also studies and adopts the best recommendations and policies that the NRC and the Agency itself already have carefully defined in past years. We hope that your implementation of this important law will bring together the country's best minds and best practices on science and environmental regulation both in and outside the government. Thank you for the opportunity to provide these comments today.

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