ACC Proposes New Prioritization Tool to Increase Effectiveness of 
EPA’s Chemical Review Process

ACC supports efforts to modernize America’s chemical regulatory system by updating the Toxic Substances Control Act (TSCA). As part of these efforts, ACC has developed for EPA’s consideration a scientifically-based approach to determine which priority chemicals warrant a more in-depth assessment.

A prioritization tool, like that being proposed by ACC, will help EPA evaluate chemicals more efficiently and effectively. It will provide scientifically-based, credible information about the inherent hazards, broad uses and potential exposures of chemicals in commerce today. It will enable the public, public health officials, lawmakers and businesses to understand better which chemical uses raise questions suggesting further evaluation by EPA, and which do not. Canada incorporated a similar prioritization tool into the country’s chemical regulatory system with support from health and environmental advocates.

**EPA lacks a consistent, transparent process to evaluate which chemicals need further evaluation.**

Today, EPA does not have a systematic way to determine which chemical uses need further evaluation. Without a scientifically-based process, EPA may be wasting time, energy and resources gathering additional information on already well-understood chemicals and/or analyzing data on chemicals with uses that do not pose a significant risk to public health or the environment.

**ACC’s prioritization tool would allow EPA to apply objective criteria to prioritize chemicals for further review so the agency can focus its resources where the greatest needs exist.**

- ACC’s prioritization tool would be administered by *EPA* to:
  - Evaluate chemicals against transparent, consistent, scientifically-based criteria focused on the hazard associated with a chemical, how the chemical is used and how people or the environment are exposed to the chemical;
  - Ascribe a score based on the criteria;
  - Rank order chemicals based on their scores *and* the professional judgment of EPA officials so, if appropriate, a chemical could be ranked higher than its numerical score reflects. For example, insufficient hazard information would trigger a high hazard ranking by EPA;
  - Utilize the rankings to determine which chemicals should be referred to EPA’s Office of Chemical Safety & Pollution Prevention for a risk assessment.
The individual criteria that would be applied to determine a chemical’s ranking include:

- Human health hazards such as potential links to cancer at relevant exposures or possible reproductive or developmental effects;
- Potential environmental effects;
- A chemical’s industrial, commercial and consumer uses;
- Whether it persists or accumulates in the body or the environment;
- The volume of a chemical in commerce;
- Other factors such as whether it is formulated in children’s products or detected in biomonitoring programs;
- The robustness of available studies, data and information.

**EPA could utilize the prioritization tool to draw upon existing information to start down a path to more effective regulation of chemicals.**

EPA either already possesses, or has access to, a wealth of information, including health and safety information, about the vast majority of chemicals in use in the U.S. today. This information is available through a variety of programs and sources including EPA’s High Production Volume Program, which reflects health and safety information for approximately 95 percent of the chemicals in commerce by production volume, EPA’s program to screen new chemicals before coming to market and information exchanges with other regulatory authorities.

**The tool identifies priority chemicals for further evaluation and assessment, not chemicals that necessarily present a risk to human health or environment.**