Animal Welfare Priorities for Effective TSCA Modernization

**Release and consideration of existing data prior to any new testing.** Legislation should provide strong incentives for companies to make available to EPA existing chemical, physical and toxicological data and information on chemicals in commerce, including that generated under current voluntary programs, prior to any new testing. Toxicological data from other regulatory agencies, including international programs, should be considered before requiring new testing.

**Explicit incorporation of the objectives of the “Toxicity Testing for the 21st Century” paradigm outlined by the NRC in 2007.** This would include substantive support for efforts toward the NRC Vision. The legislation should also do the following:
- Provide strong incentives to avoid further testing on animals if another scientifically satisfactory method is reasonably and practicably available and provides comparable information for hazard evaluation
- Prevent duplication of animal studies by discouraging unnecessary toxicity testing
- Encourage the formation of consortia for the purposes of data sharing and coordination of any new testing
- Ensure EPA oversight of clustering or grouping of chemicals (chemical categories) and read-across of data between related chemicals
- Ensure public review of any new testing orders, including relevant background information

**Incorporation of Integrated Testing Strategies.** References to a specific checklist of data requirements should be replaced with a chemical-specific design strategy that takes into account physiochemical properties, existing data, and real or potential exposure information for each chemical. Chemical testing should be performed in a tiered, stepwise fashion, with all subsequent testing dependent on results from previous testing.

**Flexible language describing hazard and risk allowing for incorporation of new technologies.** Legislation should give the EPA the flexibility to use data from a variety of test methods, including *but not limited to* endpoints from animal testing. Therefore, legislation should stipulate that hazard and risk assessments be made considering the following:
- *Any* relevant data using a weight-of-evidence approach that addresses strengths and limitations of study design, relevance and reliability of test methods, and quality of data
- Specific measures that encourage the use of non-animal and alternative methods and avoid references to animal-based risk measures (Bench Mark Dose, Lethal Dose 50, etc).
- Risk standard should be defined as: “significant risk to human health (or the environment) under reasonably anticipated conditions of use” or “reasonable expectation of safety for intended use,” rather than “reasonable certainty of no harm,” which is scientifically unsupportable.

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