

CHEMISTRY CREATES AMERICA COMPETES™



Rebuilding Confidence, Integrity and Transparency in EPA Chemical Assessments

The U.S. Environmental Protection Agency (EPA) established the Integrated Risk Information System (IRIS) program in 1985 to support EPA's mission by identifying and characterizing the human health effects that may result from exposure to chemicals in the environment.

The foundation of sound chemical hazard and risk assessments lies in the integration of the best available science and a commitment to transparency throughout the process. While some EPA program offices and state agencies use IRIS assessments in their regulatory, permitting and enforcement decisions, many federal and state agencies, scientific bodies, businesses and manufacturers, industry stakeholders and the public have lost confidence in the IRIS program due to assessments that do not meet scientific standards. This lack of confidence and trust hinders the IRIS program's effectiveness to inform environmental and public health regulations.

Inconsistent Scientific Quality and Transparency

EPA's peer review and scientific advisory processes have limited the scope of peer reviews and failed to consider or incorporate scientific recommendations. This approach not only undermines public trust but also violates statutory requirements, like the Federal Advisory Committee Act. Furthermore, it weakens the scientific standards under the Toxic Substances Control Act (TSCA), the Clean Air Act and other federal laws.

The Biden Administration proposed new scientific integrity policies, but their inconsistent implementation across EPA program offices highlights the need for a comprehensive plan to establish increased accountability across the Agency. EPA's reliance on non-transparent, proprietary, or even erroneous data not only jeopardizes its ability to fulfill its mission, but it also constrains investment in innovation and increased manufacturing here in the United States.

Restoring Trust in Chemical Assessments

The Trump administration can take proactive steps to restore public trust and confidence in EPA's regulatory and decision-making process by increasing transparency, strengthening the peer review process and applying the best available science in chemical assessments.



Challenges with EPA's IRIS Assessments

IRIS Assessments are Plagued with Scientific Uncertainty, Lack of Transparency and Accountability

- Not based on the best available science and the weight of the scientific evidence
- Setting hazard and toxicity values below current EPA and OSHA standards
- No transparency

IRIS Assessments have Significant Regulatory Implications and are a Threat to American Workers and Economic Competitiveness

- Overly stringent standards lead to unnecessary requirements under the Clean Air Act and unwarranted TSCA risk determinations.
- May result in new restrictions or effective bans of critical, building block chemistries like formaldehyde and ethylene oxide.
- Jeopardize millions of American jobs across countless industries and manufacturing sectors.
- Excessively restrictive regulations based on flawed science and inconsistent data, like IRIS assessments, hinders investment in American innovation and manufacturing.

IRIS is not Authorized, Biased and Fails to Correct Inaccurate Assessments

- Congress has **never** authorized funding EPA's IRIS program in its 40-year history.
- The U.S. House of Representatives voted in 2023 and 2024 to eliminate funding for IRIS assessments.
- Identified by the U.S. Government Accountability Office (GAO) as a program in dire need of transformation, having remained on the "high risk list" for over a decade due to rampant vulnerability to waste, fraud, and abuse.
- Not adequately responding to Information Quality Act requests, only correcting five IRIS assessments since August 2018.

3 Key Solutions to Rebuild Confidence and Trust in EPA's Chemical Assessment Process

1 Immediately Disband the IRIS Program

- The EPA administrator should immediately prohibit the use of IRIS assessments to develop, finalize, or issue a rule or regulation and reassign IRIS responsibilities to agency program offices.
- Direct EPA program offices to be responsive to Information Quality Act requests for correction for recent IRIS assessments.
- Ensure agency program offices are in full compliance with all Presidential directives and Congressional Review Act (CRA) mandates.

2 Increase Transparency and Engagement

- Issue a request for information from stakeholders to identify areas where the EPA has failed to use the best available science.

3 Increase Transparency and Strengthen Scientific Oversight

- The EPA Administrator should appoint an independent science advisor with the authority to streamline chemical assessment activities and enhance scientific oversight and establish an independent committee to investigate research misconduct.
- The EPA Administrator should issue a comprehensive memorandum outlining statutory requirements for the use of the best available and transparent science in regulations, including detailing the procedures for implementing the scientific standards under Section 26 of TSCA and the collection of data and information under Section 307 of the Clean Air Act.