June 11, 2025

The Honorable Lisa Murkowski
Chair, Subcommittee on Interior,
Environment, and Related Agencies
Senate Committee on Appropriations
S-125, The Capitol
Washington, DC 20510

The Honorable Mike Simpson
Chairman, Subcommittee on Interior,
Environment, and Related Agencies
House Committee on Appropriations
2007 Rayburn House Office Building
Washington, DC 20515

The Honorable Jeff Merkley
Ranking Member, Subcommittee on Interior,
Environment, and Related Agencies
S-125, The Capitol
Washington, DC 20510

The Honorable Chellie Pingree
Ranking Member, Subcommittee on Interior,
Environment, and Related Agencies
2007 Rayburn House Office Building
Washington, DC 20515

Dear Chair Murkowski, Ranking Member Merkley, Chairman Simpson, and Ranking Member Pingree:

As you work on the Fiscal Year 2026 Interior, Environment and Related Agencies bill we urge you to address an important issue impacting American jobs and economic competitiveness. Specifically, the Environmental Protection Agency's (EPA) Integrated Risk Information System program (IRIS).

At the start of virtually every supply chain are chemistries needed to manufacture a wide range of critical products. Chemical management policies that are both predictable and based on findings supported by high quality information are fundamental to promoting American innovation and strengthening our economy.

The Environmental Protection Agency's (EPA's) risk evaluations and risk management policies for chemicals must be based on the best available science. IRIS has often fallen short of scientific standards required of EPA and is out of step with global health agencies and regulators. IRIS fails to adequately incorporate high quality and relevant science and does not consistently utilize a "weight of the scientific evidence" approach. Also, the process IRIS uses to prioritize and select chemicals for assessment lacks transparency.

Controversy over EPA's IRIS process, the resulting hazard values, and the use of those values is not a new phenomenon. Specific concerns include: a lack of impartiality in accurately reporting scientific information, scientific inaccuracy, lack of transparency, limited peer review, and slow progress in producing assessments -- these issues and others have been raised by Congress on many occasions. Moreover, Congress has never authorized IRIS and since 2009 the program has been flagged as a "high risk" program vulnerable to waste, fraud, abuse, or mismanagement by the U.S. Government Accountability Office (GAO).

CC: The Honorable Patty Murray, The Honorable Susan Collins, The Honorable Tom Cole, The Honorable Rosa DeLauro

EPA's IRIS values fail to go through regular rulemaking checks related to notice-and-comment, interagency review, and engagement with stakeholders. These assessments are not valid for use as enforceable regulatory standards and often omit key information. For example, IRIS toxicity values are often set below naturally occurring background levels, detection limits, or levels of the chemical produced by the human body. Nearly all recent assessments have established toxicity values that are also well below existing standards set by EPA, OSHA, or the European Union.

Despite these concerns, EPA has relied on IRIS assessments in regulatory contexts, particularly for critical building block chemicals. These actions could result in bans, unachievable standards, enforcement actions, and litigation. Recent examples include:

- **Final Formaldehyde Risk Evaluation:** EPA recently issued its final risk evaluation under the Toxic Substances Control Act (TSCA) that was based on a flawed IRIS assessment. EPA's final risk evaluation concludes that virtually all occupational conditions of use contribute to "unreasonable risk" under TSCA. The TSCA risk evaluation for formaldehyde relies on a faulty IRIS value to propose workplace limits that are significantly lower than the recently updated European Union occupational limits and could result in potential bans or difficult-to-meet standards for some uses. EPA has received fundamental criticism from multiple peer review bodies and public comments provided by hundreds of experts, stakeholders, and other agencies. Members of the EPA's own Science Advisory Committee on Chemicals (SACC) have raised serious concerns over EPA's reliance on IRIS.
- **EPA Air Rules on Ethylene Oxide:** These rules affect critical industries like electric vehicles, semiconductor manufacturing, and health care. The rules rely on a deeply flawed IRIS value for ethylene oxide that is 23,000 times lower than naturally occurring levels in the human body.
- **Biden Administration DOJ Action:** An IRIS value was used to justify emergency action seeking to shut down a manufacturing facility under Section 303 of the Clean Air Act.
- **Final IRIS Review of Inorganic Arsenic:** This IRIS assessment was not based on an objective review of relevant scientific information and does not reflect actual exposure experienced by the U.S. population to inorganic arsenic. The controversial risk value is 21 times more stringent than the previous values established, which were also exaggerated. If the new toxicity values are used to guide policy and regulatory determinations, they will drive new regulatory levels for inorganic arsenic significantly lower than naturally occurring background levels of arsenic in soil and water in many states, with impacts on soil remediation programs (e.g., Superfund), drinking water standards, crops, and other food supplies.
- **Final IRIS Review of Hexavalent Chromium:** EPA's recent IRIS assessment disregarded the weight of evidence and may lead to a new drinking water standard far lower than the average background levels of naturally occurring hexavalent chromium in groundwater. This could impose massive costs to water systems nationwide with little to no public health benefit.

In recent years, Members of Congress have raised serious concerns about IRIS. Funding restrictions were included in both the bill text and Committee report for both the FY25 and FY24

House Interior appropriations bills. The "No IRIS Act" (S. 623/H.R. 1415) which would prohibit EPA from using IRIS assessments to develop regulations has been introduced by Senator John Kennedy (R-LA) and Congressman Glenn Grothman (R-WI).

In its May 2 announcement of organizational improvements, the Environmental Protection Agency signaled that it will move away from IRIS and ensure program offices conduct evaluations appropriate with their statutory authority. Likewise, the FY2026 budget request released by the Office of Management and Budget (OMB) "puts an end to…skewed, overly-precautionary modeling that influences regulations -- none of which are authorized by law."

Therefore, we ask you to consider including limitations on the funding for IRIS and the use of IRIS values for regulatory purposes. We appreciate your consideration and look forward to working with you and your staff on this important issue. Thank you for your attention to this matter.

Sincerely,

American Chemistry Council

Adhesive and Sealant Council

Agricultural Retailers Association

Alliance for Chemical Distribution

American Association of Veterinary Laboratory Diagnosticians

American Cleaning Institute

American Coatings Association

American Composites Manufacturers Association

American Farm Bureau Federation

American Feed Industry Association

American Forest & Paper Association

American Foundry Society

American Fuel and Petrochemical Manufacturers

American Home Furnishings Alliance

American Wood Council

AmericanHort

Arsenic Science Task Force

Asphalt Roofing Manufacturers Association

Catfish Farmers of America

Color Pigments Manufacturers Association

Communication Cable and Connectivity Association

Composite Panel Association

Decorative Hardwoods Association

Florida Tropical Fish Farms Association

Hardwood Federation

Hawaii Aquaculture and Aquaponics Association

INDA, Association of the Nonwoven Fabrics Industry

Independent Lubricant Manufacturers Association

International Sleep Products Association

International Molybdenum Association

International Wood Products Association

Kitchen Cabinet Manufacturers Association

National Aquaculture Association

National Asphalt Pavement Association

National Association for Surface Finishing

National Association of Manufacturers

National Association of Printing Ink Manufacturers

National Cotton Council

National Electrical Manufacturers Association

National Funeral Directors Association

National Mining Association

National Wood Flooring Association

Non-Ferrous Founders' Society

North American Insulation Manufacturers Association

Ohio Chemistry Technology Council

Organic Arsenic Products Task Force

Pine Chemicals Association International

Plumbing Manufacturers International

Polyisocyanurate Insulation Manufacturers Association

PRINTING United Alliance

RadTech International North America

Single Ply Roofing Industry

The Society of Chemical Manufacturers & Affiliates

Spray Polyurethane Foam Alliance

Steel Founders' Society of America

Styrene Information and Research Center

The Fertilizer Institute

The Methanol Institute

Treated Wood Council

U.S. Chamber of Commerce

USA Rice

Vinyl Institute

West Virginia Forestry Association

West Virginia Manufacturers Association