

**Comments Submitted by David B. Fischer on behalf of the
American Chemistry Council to the SAB Dioxin Review Panel on**

*SAB Review of EPA's Reanalysis of Key Issues Related to Dioxin Toxicity and
Response to NAS Comments*

March 1, 2011

Good afternoon and thank you for the opportunity to address the SAB Dioxin Review Panel. My name is David Fischer and I am an Assistant General Counsel at the American Chemistry Council. As detailed in previously submitted written comments, ACC strongly agrees with many of the SAB's recommendations in its Draft Report (SAB Review of EPA's Reanalysis of Key Issues Related to Dioxin Toxicity and Response to NAS Comments).

ACC, however, recommends that the SAB revise this Draft Report by:

1. Stressing the importance of weight of evidence approach in the selection of POD and dose-response assessment. In particular, the available body of scientific evidence supports the quantitative observation by Baccarelli *et al.* (2008) that NO statistically significant relationship between maternal dioxin or TEQ concentrations was observable at maternal serum concentrations below 75 ppt TEQ (50 ppt TCDD).
2. Reinforcing that EPA should more carefully consider the role of peak vs. average exposures in the sperm effects noted by Mocarelli *et al.* (2008), particularly in light of the pattern of evidence from the Bell *et al.* (2010) review.
3. Endorsing Dr. Rozman's views expressed in appendix A of the Draft Report, "that there is negligible, essentially zero, carcinogenic risk at current background levels which are much lower than past levels. Any other conclusion is incompatible with sound science and no amount of modeling or data manipulation will transform a non-existing effect at occupational exposure levels into a risk at current background levels other than the non-scientific, policy-driven, non-threshold extrapolation by EPA."
4. Recognizing the potential for co-exposures of the NIOSH workers evaluated in the (Cheng *et al* 2006) study to numerous other carcinogens.
5. Clarifying that EPA must conduct an uncertainty analysis to ensure the scientific robustness of the final reanalysis regardless of the additional time or effort required by EPA staff.

Finally, ACC strongly urges this SAB to advise EPA on the best approach to finalizing the dioxin reassessment. At a minimum, EPA should significantly revise the dioxin reanalysis document based on public comments and the SAB's report.

The final reanalysis, along with updated exposure information, should then be used to revise and create a fully up-to-date Part III of the dioxin reassessment. Part III not only was the focal point of the NAS review, but it is unquestionably the most important part of the dioxin reassessment. In this manner, the risk characterization will be a comprehensive, stand-alone document, fully reflective of the best available science.

As noted by a previous SAB Panel reviewing the draft dioxin reassessment, given the large public health and economic stakes in the dioxin reassessment, the Agency is well-advised to make sure that its final conclusions about dioxin have a high degree of support within the scientific community; otherwise, risk managers will not be in a strong position to perform their roles with competence and credibility.

Thank you for your attention.