

September 16, 2009

Dear Committee on Science Integration for Decision Making:

Thank you for undertaking this important and timely study, and thank you for granting me the opportunity to speak directly with the Committee. I congratulate the Agency for assessing the process and extent to which science provided by EPA's science advisory boards (SABs) and National Academy of Sciences (NAS) panels is integrated into decision-making and policy. I wish to simply make a brief comment directed at the process and procedural mechanism of reviews.

As a chemical industry representative, I'm very interested in the outcome of this study and how it may impact some of the lingering chemical reviews within the Agency. For instance, the development of the draft dioxin reassessment has been ongoing for nearly 20 years. It has undergone two SAB reviews, prompted an extensive Interagency Working Group review, and in 2006 was the subject of an NAS review. In addition, the draft dioxin reassessment has available an impressive published database on exposure and the effects that have been observed in laboratory animals and humans accidentally or occupationally exposed to dioxin. Yet, despite this scrutiny and the enormous volume of research available to advise decisions, the reassessment is still incomplete. In two separate Federal Register Notices of November 24, 2008 and December 29, 2008, the Agency outlined a well-designed process to inform EPA's response to the National Academy of Science comments on EPA's 2003 dioxin reassessment. The involvement of the broader scientific and stakeholder community in responding to the 2006 NAS recommendations would greatly support the Agency's technical efforts and in keeping with the current Administrations call for transparency and scientific integrity. However, the Agency's announcement of what appears to be a new process on May 26, 2009 entitled "EPA's Science Plan for Activities Related to Dioxins in the Environment" seems to preempt all previous processes for addressing the completion of this important document. And it is now unclear how this new two-page plan has been reconciled to the process previously described in the two prior Federal Register Notices. It is incumbent upon the Agency to clarify its review processes, and to provide a mechanism for allowing science to inform decision making. It will be important to evaluate how the Agency was able to effectively integrate the recommendations of two prior SABs and the recent 2006 NAS recommendations which represent the expertise of numerous experts in the areas of dioxin toxicology and risk assessment.

Thank you.

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