



November 18, 2014

Comments submitted to the SAB CAAC via email to Aaron Yeow

Public statement from Nancy Beck, PhD, DABT, on behalf of the American Chemistry Council to the Scientific Advisory Board Chemical Assessment Advisory Committee (CAAC) for the review of the Draft IRIS Ethylene Oxide (Aug 2014) Assessment.

Thank you for the opportunity to comment today. I sent a letter to Aaron last week and hopefully you have seen it. I would like to just make three quick points.

1. I wanted to take a moment to thank Dr. Thorne for lessening my concerns regarding the public comments on the draft Ethylene Oxide (EO) charge. During the first teleconference I was pleased to hear Dr. Thorne state that all the public comments and recommendations for specific charge questions will be considered by the Chemical Assessment Advisory Committee (CAAC) members as they conduct their review and evaluate the draft charge questions provided by EPA. This is a very important part of the peer review process because if the charge is not asking the right questions, this could potentially hamper the agency's ability to complete the assessment. The suggestions made by the stakeholders on the draft charge were not made lightly and represent important scientific questions that should be addressed in an objective and transparent manner, considering all of the evidence. We look forward to seeing your responses to the specific issues that have been identified by EPA as well as stakeholders.
2. As you are likely now aware, in addition to the SAB handbook for members and consultants, in FY2012 the SAB announced new initiatives to improve public engagement with all stakeholders. These initiatives address seven important aspects of the review process including:
  - i. Ensuring that public comments are welcomed on all materials, including the charge.
  - ii. Ensuring that the charge is not unduly narrow and ensuring time to discuss the charge at the first meeting (or in this case a teleconference) due to its importance.

- iii. Ensuring that chairs ask committee or panel members if they have clarifying or follow-up questions for public presenters. My understanding is that this is to facilitate dialogue which was previously found to be too limited.
  - iv. Allowing for additional clarifying remarks not only from the agency but also from the public later in the meeting as the panel deliberates on responses to the charge questions.
  - v. Ensuring that reports focus on focus on scientific and technical – rather than policy – issues.
  - vi. And finally, asking that reports acknowledge information from the public that was helpful.
3. This CAAC panel was formed to be independent expert science advisors to the EPA regarding the EO assessment. Thus it is important that your comments focus on providing EPA with advice to help strengthen the scientific rigor of the document. You should not worry about whether your recommendations will be difficult or easy for EPA to implement. Factoring in how to address comments is the purview of the Agency and timelines should not be your concern (although they rightly should be an agency concern). Similarly, when something is not clear to you, you should not accept a reasoning that simply states that something was done because it is standard IRIS practice. If something doesn't make sense, or can be improved, we hope you will provide comments to improve the methods and approaches, rather than just accepting the norm. Dr. Olden has committed to improving the science in IRIS assessments and your independent objective comments, however difficult they may be to address, are what he and other stakeholders, including the dose-response and risk assessment community truly need. We will look forward to reviewing your draft report when it is completed.

Thank you again for the time and energy you have put in and will continue to put into this review. I would be happy to answer any questions.