March 18, 2011

Dr. Angela Nugent
Designated Federal Officer, EPA
Science Advisory Board (1400R)
U.S. Environmental Protection Agency
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PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS

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Via USPS and e-mail to: nugent.angela@epa.gov

Re: **76 FR 11456, March 2, 2011; Science Advisory Board Staff Office; Notification of a Public Meeting of the Chartered Science Advisory Board; Public Input.**

Dear Dr. Nugent:

People for the Ethical Treatment of Animals (PETA) is the world's largest animal rights organization, with more than two million members and supporters. We appreciate the opportunity to provide comments to the Chartered Science Advisory Board regarding the Scientific Advisory Board (SAB) Research Budget Workgroup Draft Report (3/17/11) on the President's proposed FY 2012 budget for EPA research.

Like the SAB Workgroup, we support integration of Computational Toxicology, Endocrine Disrupting Chemicals, and Nanotechnology research, as well as portions of Pesticides and Toxics, Land Protection and Restoration, Human Health and Ecosystems, Sustainability (E-waste), Human Health Risk Assessment, and Clean Air research programs, into the new Chemical Safety and Sustainability (CSS) Research Program. This multi-disciplinary approach to evaluating chemical exposure, hazards and risks will increase efficiency and improve science-based decision making, as well as avoid the sometimes inconsistent approaches amongst programs seen in the past. This approach will also facilitate advances in protection of human health and the environment across agencies. We agree with the SAB that the specific objectives of the CSS Program could be better articulated and that a plan should be developed for translating the results of CSS for application within the Human Health Risk Assessment program. In this regard, ORD should consider collaborating with the Office of Pesticide Programs which is currently developing methods for translating Tox21-type information into its risk assessment framework.[1]

We applaud the SAB's support of the greater emphasis being placed on use of computational toxicological tools for evaluating chemicals. In addition to the benefits of a mechanism-based assessment approach for evolving predictive toxicological science, these tools have the potential for huge savings in time, money and animal lives. We also support the plan to continue expansion and validation of ToxCast™ for use in chemical toxicity and endocrine disruptor characterization. In particular, we agree with the SAB's observation that "by combining the endocrine disruptor screening program with the computational toxicology program, there is a

[1] EPA Office of Pesticide Programs, Strategic Direction for New Pesticide Testing and Assessment Approaches. http://www.epa.gov/pesticides/science/testing-assessment.html (Accessed 18 March 2010).

significant opportunity for the former to be modernized and provide much more valuable information for decision-making." In this light, given that the next-generation computational toxicology tools will be applicable to and benefit assessment of both endocrine disrupting chemicals and green chemistry, the relative proposed increases in budget allotment seem disproportionate. The SAB supports an increase for endocrine disrupting chemicals research of +48% ($5.5M), an increase in the new green chemistry research of +$5.4 M, yet an increase for next-generation computational toxicology tools of only +$2 M. Given the potential impact of computational toxicology tools, this distribution should be more equitable (for example, $4.3 M each), which would allow these valuable tools to be developed and delivered more expeditiously.

We also agree with SAB's conclusion that, regarding the new CSS Program, "(o)f all the new program areas, this one has the most potential to accomplish game-changing objectives" and that CSS "has the potential to make game-changing contributions in predictive toxicology and in decreasing uncertainty in risk assessment through the use of state-of-the-art screening methods and computational approaches." We are especially appreciative of SAB's recognition that this program can meet the objective of "reducing the use of animal models *[sic]* to assess toxicity and relying more on predictive models," a goal that we have worked hard to promote at EPA.

With regards to the additional $7 million allocated to Science to Achieve Results (STAR) grants to academia for the purpose of accelerating and advancing state-of-the-art assessment and management of environmental endocrine disruptors, we believe this approach can be productive as long as the research being funded is focused on the specific priority needs of EPA's endocrine disruptor program and will lead directly to improvements in the tools and strategies used for chemical risk assessment and control.

We agree with the SAB's concern over the reduction in human health research, and resultant elimination of EPA capability to conduct major epidemiological studies, and believe that it will have serious impacts EPA's ability to protect human health. Epidemiological studies provide much-needed human relevant data, which are far superior to protecting human health than data extrapolated from high-dose animal experiments. This information is urgently needed to be able to better determine and understand exposures and dose-responses of chemicals in the environment so as to develop regulations that fully protect public health and ecosystems. Reducing the Agency's budget in this area will slow progress and make it more difficult to achieve this critical part of the agency's mission.

We appreciate your consideration of these comments. I can be reached at PatriciaB@peta.org or 757-390-0564 should you have any questions..

Sincerely,

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