



April 3, 2013

COMMENTS FOR THE 1ST MEETING OF THE EPA'S CHEMICAL ASSESSMENT ADVISORY COMMITTEE

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Center for Advancing Risk Assessment Science and Policy

<http://www.americanchemistry.com/ARASP>

☐ Promotes

- Development and Application of Scientifically Sound Methods
- Adoption of Policies and Practices that Use Best Available and Relevant Science
- Use of Mode of Action (MOA) Information

☐ Supports Transparent and Explicit Data Evaluation Criteria

EPA Commitments for IRIS Program

- ❑ Improved IRIS Product
- ❑ Improved Process
- ❑ Improved Peer Review
 - ❖ *Formation of the CAAC*

From: EPA's November 13, 2012 Public Stakeholder Meeting

Additional Work Remains

- ❑ Transparency, Objectivity, Consistency
 - Data Acquisition
 - Study Evaluation
 - Study Integration (Weight of Evidence)
 - Risk Characterization/Presentation
- ❑ Peer Review/Honest Broker

The CAAC



- ❑ Valuable element in EPA's efforts to improve the IRIS program
- ❑ Represents a balance of scientific and technical viewpoints
- ❑ Allows for the augmentation of the CAAC membership with additional subject matter experts as needed in reviewing draft IRIS assessments

Clarifying the CAAC's Purpose

- ❑ Will the CAAC review all draft IRIS assessments?
 - Will stakeholders have a role in determining what CAAC reviews?
 - Will the prioritization process be transparent?
- ❑ Will the CAAC review other IRIS related documents, such as the newly developed preamble and the draft handbook for IRIS assessment development?
- ❑ Will the CAAC have any role in advising whether or how EPA implements any forthcoming NAS recommendations?
- ❑ Will the CAAC have input on IRIS related webinars or workshops?
- ❑ Will the Chartered SAB provide oversight in reviewing and approving final CAAC reports?

Setting the Stage for a Robust CAAC

- ❑ Develop a clear charge that outlines the specific goals and objectives of the CAAC.
 - ❖ With input from EPA and stakeholders, develop a prioritization structure to determine what specific assessments CAAC will and will not review.
- ❑ Review all guidance, handbook or procedural documents (e.g. systematic review processes, problem formulation, data quality evaluation) that are applicable and relevant to the development of IRIS assessments.
 - ❖ Make suggestions for further necessary guidance the agency has not yet developed.
- ❑ Ensure that CAAC meetings/teleconferences offer an opportunity for robust public comment on key issues and on charge questions.
 - ❖ Implement SAB FY12 Initiatives.
(<http://yosemite.epa.gov/sab/sabproduct.nsf/WebSABSO/PublicInvolvement?OpenDocument>)
 - ❖ Encourage open scientific dialogue and thoughtful scientific deliberation between peer reviewers, EPA and the public. Presently, the public commenters have ~5 minutes to present.
- ❑ Develop a Solid QA/QC process for IRIS Assessments
 - ❖ Apply NRC Report review process or Scientific Journal model (independent step) for ensuring that IRIS assessments adequately addressed public and peer review comments and recommendations. Ensures that public and CAAC comments are incorporated appropriately by EPA staff.