IRIS Bimonthly Meeting Arlington, VA December 13, 2013

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Advocacy: the voice of small business in government

Small Business and IRIS

IRIS has implications for regulations and regulatory policy

NRC Recommendations (2011)

- Establish Standard Protocols for Evidence Identification
- Establish Clear Guidelines for Study Selection
- Standardize Presentation of Studies to Capture Study Characteristics, WOE and Utility for Deriving Unit Risks
- Standardize Approach for WOE

IRIS Enhancements – July 2013

Step 1 Chemicals

- Publicly releases literature search, literature search strategy, critical study selection criteria, evidence tables for critical studies, and exposure-response figures
- Convenes public meeting to discuss literature search, evidence tables, exposure-response figures and key issues

Missing Information

- Critical Study Selection Criteria
- Identification of Critical Studies and Rationale for Selection
- Evidence Tables Presenting the Critical Studies
- Identification and Application of WOE Factors
- Identification of Key Issues

NRC (2011) Implementation

- July 2013 IRIS enhanced procedures were designed to implement the NRC recommendations
- EPA adopted strategy of robust early input to avoid low quality IRIS assessments
- Proper implementation of enhanced procedures is critical to small business input

Industry Comments

Previous commenters, including trade associations representing small businesses, found that EPA generally did not fully implement the Step 1 procedures regarding study quality, identification of critical studies and weight-of-evidence (WOE) criteria for both step 1 and step 4 chemicals.

Conclusions

- Step 1 Chemicals
 - EPA Should Supplement Step 1
 Materials with Study Quality Criteria and Identification of Critical Studies
 - EPA Should Identify Key Issues
 - EPA Should Convene New Step 1 Public Meeting in Accordance with Enhanced IRIS Procedures

Conclusions

Step 4 Chemicals

 EPA Should Modify Assessment to Address Inadequacies
 EPA Should Improve Peer Review Questions

Additional Comments

EPA Needs to Set Aside Adequate Time for Step 1 and Step 4 Meetings to Ensure Robust Dialogue Among Scientists

Additional Comments

Chemical Specific CAAC Review Committees Need to Include Diversity of Viewpoints (Not Solely Government and Academic)

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