#### 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)

## **Contact Information**

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