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## The Safe Chemicals Act of 2010: Efficient Testing for Effective Regulation

There are a number of positive elements in the Safe Chemicals Act of 2010 (S. 3209). However, to ensure chemicals can be assessed as efficiently as possible, the following additional improvements are recommended. Making these changes will ensure effective assessment of chemicals for the safety of public health and the minimization of animal use.

### ELEMENTS TO KEEP –The bill:

- Encourages the use of scientifically acceptable nonanimal methods and maximizes the use of existing data.
- Leaves the determination of minimum data set up to the Environmental Protection Agency (EPA) and may allow varied or tiered testing for different chemical substances, mixtures, or categories—this flexibility is essential to keep the law relevant as science changes.
- Directs the EPA to conduct and fund the development of new nonanimal methods.
- Contains reasonable criteria for waiving animal testing requirements in appropriate cases.

### ELEMENTS TO IMPROVE—The bill should:

- Require the use of nonanimal methods where appropriate. The European Union has done this since 1986, and requiring the use of new methods is proven to stimulate innovation.
- Direct Congress to appropriate a specific dollar amount to further the development of nonanimal testing methods.
- Specify that members of the Science Advisory Board on Alternative Testing Methods must have demonstrated expertise in alternative methods. The board should also include public members, not just government scientists.
- Propose a more sensible safety standard. The current “reasonable certainty of no harm” is scientifically unsupportable for nonreactive substances and will greatly increase animal testing without improving human protection.
- Direct the EPA to update the “list of alternative methods” on an ad hoc basis as new methods become available but at least annually.
- Clarify the extent to which “mixtures” and “articles” are required to be tested apart from their constituent chemicals.
- The bill should specify provisions for the sharing of data between governments to prevent duplicative testing.