



P H Y S I C I A N S
C O M M I T T E E
F O R
R E S P O N S I B L E
M E D I C I N E

5100 WISCONSIN AVENUE, N.W. • SUITE 400
WASHINGTON, D.C. 20016
T: (202) 686-2210 • F: (202) 686-2216
PCRM@PCRM.ORG • WWW.PCRM.ORG

The Toxic Chemicals Safety Act: Efficient Testing Needed for Effective Regulation

There are a number of positive elements in the Toxic Chemicals Safety Act of 2010 (HR 5820). 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 non-animal methods and maximizes the use of existing data.
- Leaves the determination of minimum data set up to EPA and requires varied or tiered testing of existing 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 non-animal methods.
- Contains reasonable criteria for waiving animal testing requirements in appropriate cases.

ELEMENTS TO IMPROVE—The bill should:

- Provide for an advisory committee on non-animal methods with members of the public with expertise in their development and use. **Reference to the Interagency Coordinating Committee for the Validation of Alternative Methods (ICCVAM) in Section 34 should be removed.** ICCVAM members serve voluntarily and do not necessarily have expertise in toxicology testing or non-animal methods development. Moreover ICCVAM is recognized as a barrier to the development and use of non-animal testing methods and will not provide appropriate advice to the US EPA.
- **Require** the use of non-animal methods where appropriate. The EU 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 non-animal testing methods.
- Allow for testing **exemptions** for chemicals that are not **released** into the environment.
- Provide for a **flexible minimum data set for new chemicals** and a chance for manufacturers to consult with EPA and propose strategies that would reduce testing at the outset.
- Direct the EPA to update the “list of alternative methods” on an ad-hoc basis as new methods become available but at least **annually**—not triennially as Section 34 currently states.