

November 25, 2014

U.S. Environmental Protection Agency  
Office of Research and Development  
National Center for Environmental Assessment  
Research Triangle Park, North Carolina and Washington D.C.  
Attn: Mr. Lek Kadeli, Dr. Ken Olden and Dr. Robert Kavlock

(Conveyed via e-mail to the addressees)

Subject: Scientific integrity in the IRIS program and EPA's mission

Dear Sirs;

We are writing you with our concerns regarding the need to maintain the scientific objectivity in the IRIS program. We represent groups with diverse objectives, activities and members, but we all recognize and strongly support an effective and highly skilled workforce at EPA. Our concerns derive from external pressures that have plagued the IRIS program, at times confounding and slowing essential progress on chemicals to which millions of Americans are exposed.

“EPA's basic mission is to protect human health and the environment”<sup>1</sup> The IRIS program develops chemical evaluations that are fundamental to this mission. The evaluations and related science are used in the development of protective actions essential to communities in harms way (e.g., Environmental Justice communities), in programs that serve Veterans exposed to chemicals such as TCE, in drinking water standards that protect all Americans, in evaluations of hazards to sensitive populations (e.g., children and the elderly), in worker health and safety standards and in global programs that protect public health across a myriad of situations.

The work of scientists who develop IRIS assessments is essential and its quality and scientific integrity must be guaranteed. The management of this program must likewise be guided with objective science and a keen awareness of the Agency's mission to protect human health and the environment.

Unfortunately, scientists working for companies with vested interests in reducing the regulation of toxic chemicals have downplayed evidence of harm and delayed evaluations (e.g., of arsenic, formaldehyde, TCE and other chemicals). This delays public protections and the release of scientific information needed by many others including OSHA, the Veterans Administration, and state agencies.

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1 [http://compliance.supportportal.com/link/portal/23002/23009/Article/32909/What-is-the-mission-of-EPA-and-its-regulatory-partners?\\_ga=1.160965684.884647510.1416514253](http://compliance.supportportal.com/link/portal/23002/23009/Article/32909/What-is-the-mission-of-EPA-and-its-regulatory-partners?_ga=1.160965684.884647510.1416514253)

The external pressures on scientists and managers in IRIS and other programs whose mandate is public health protection is often intense. To insure that this pressure does not alter the interpretation of science or management of the IRIS program's agenda and processes, conflicts of interest in the science used by the agency must be fully disclosed and the IRIS scientific staff and management must be free from such conflicts. Scientific independence is essential to foster the highest quality science at EPA and allow the IRIS program to continue its leadership role in chemical health hazard evaluations.

We hope that the Agency will keep its mission "to protect human health and the environment" clearly in focus in this and coming years when choices are made regarding the leadership of essential programs such as IRIS. We ask for your help in insuring that the IRIS program will continue to provide the objective high quality science that is essential to protect our air, water, soil, food and the health of our people.

Respectfully submitted,

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