

March 15, 2013

The Honorable Fred Upton
Chairman
Committee on Energy and Commerce
U.S. House of Representatives
Washington, DC 20515

The Honorable Marsha Blackburn
Vice Chairman
Committee on Energy and Commerce
U.S. House of Representatives
Washington, DC 20515

Dear Chairman Upton and Vice Chairman Blackburn:

The undersigned associations support continued efforts by Congress to improve the processes and policies employed by Federal agencies to assess hazards and risks associated with the use of chemicals and other activities. Based on the record that your committee and the House Science Committee have developed through hearings and oversight, we believe Congress should now begin to develop legislation to address significant quality and efficiency problems in these assessment programs.

Congress has created or permitted the existence of several overlapping and redundant health-risk assessment programs, with no meaningful standards for the reliability and suitability of science and science-policy processes, uniform use of best practices, or efficient operation of the programs. Combined with deficiencies in transparency, stakeholder engagement, peer review, and accountability, this diminishes the quality of assessments and undermines public confidence.

These important programs are at the heart of the regulatory burden faced by many companies across all industries. Congress needs to improve the assessment process these programs use in the same way that sound policies and practices have been legislatively mandated for Federal procurement, regulatory promulgation, and small business flexibility.

Not only do overlapping and redundant assessment programs lead to confusion and loss of public confidence, but the current system is inefficient and wasteful. Redundancy and overlap also lead to faulty conclusions that drive up prices and unnecessarily expand liability in an already weak economy.

During the 112th Congress, several House committees held oversight hearings and conducted other investigations into Federal assessment programs. Congress thus has the background needed to schedule targeted hearings, perhaps involving the National Academies and other authorities to better identify opportunities for legislative reform, and to begin drafting legislation.

Our organizations are committed to working with the Energy & Commerce Committee to support your efforts to gather more information on this important

issue, to develop legislation that will create a uniform process for the government to assess the risk to human health from all the substances we encounter in our daily lives, and to gain support from your colleagues to pass the legislation.

Thank you for your attention to this fundamental regulatory issue. We look forward to working with you.

Adhesive and Sealant Council
American Coatings Association
American Composites Manufacturers Association
American Fiber Manufacturers Council
American Forest and Paper Association
American Foundry Society
Association of Equipment Manufacturers
Association of Home Appliance Manufacturers
CropLife America
The Fertilizer Institute
Industrial Fasteners Institute
Interlocking Concrete Pavement Association
International Sign Association
Kitchen Cabinet Manufacturers Association
Metal Powder Industries Federation
Metals Service Center Institute
Metal Treating Institute
National Association of Chemical Distributors
National Association of Manufacturers
National Marine Manufacturers Association
Non-Ferrous Founders' Society
Oregon Women in Timber
Precision Metalforming Association
Society of Chemical Manufacturers and Affiliates
Society of the Plastics Industry
Styrene Information and Research Center
Thermoset Resin Formulators Association
Tooling and Manufacturing Association
Treated Wood Council
U. S. Chamber of Commerce
Vinyl Institute

Cc: Representative Paul Broun
Representative Andy Harris
Representative Cynthia Lummis
Representative Lamar Smith
Representative Lee Terry