

able differently * Alaska Community Action on Toxics
Alliance of Nurses for Healthy Environments * Asbestos Disease Awareness Organization
BlueGreen Alliance * Breast Cancer Prevention Partners * California Safe Schools
Center for Environmental Health * Clean and Healthy New York
Clean Water Action/Clean Water Fund * Defend Our Health * Earthjustice
Ecology Center * Environmental Defense Fund * Environmental Working Group
Healthy Babies Bright Futures * League of Conservation Voters
Learning Disabilities Association of America * Learning Disabilities Association of Connecticut
Learning Disabilities Association of Georgia * Learning Disabilities association of Illinois
Learning Disabilities Association of Maine * Learning Disabilities Association of Michigan
Learning Disabilities Association of Oklahoma * Learning Disabilities Association of Utah
Natural Resources Defense Council * Oregon Environmental Council
Safer Chemicals Healthy Families * Science and Environmental Health Network
Toxic-Free Future * Union of Concerned Scientists * Vermont Public Interest Research Group
Women for a Healthy Environment

March 23, 2021

Honorable Michael Regan
Administrator
US Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

Dear Administrator Regan:

Congratulations on your confirmation as EPA Administrator. As non-profit organizations committed to protecting at risk communities from unsafe chemicals, we look forward to seeing you put public health, science, and equity at the center of EPA's mission.

Chemical pollution remains an urgent concern for Americans and a vital unfinished task for our regulators and public officials. Hundreds of chemicals in our products, homes, environment and workplaces have been shown to cause cancer, birth defects, neurological disorders, compromised immune systems and other serious diseases. Our progress in addressing these threats has been slow and disappointing. As you know from your work leading the North Carolina Department of Environmental Quality, Per- and Polyfluoroalkyl Substances (PFAS) are pervasive in human blood, drinking water and products, yet EPA has failed to mount a serious effort to address this growing crisis. The same is true of many other dangerous chemicals that remain uncontrolled despite mounting evidence of their harm to vulnerable and highly exposed segments of our population.

In 2016, after a decades-long campaign, Congress strengthened the Toxic Substances Control Act (TSCA), the nation's primary chemical safety law, in the face of EPA's long-standing failure to meaningfully address chemical pollution. The new law gave EPA more powerful tools with which to prioritize, test, evaluate and reduce exposure to chemicals of high concern, and the obligation to implement the law to truly protect public health, with a focus on vulnerable populations.

However, in the hands of the Trump Administration, EPA has failed to use these tools effectively and public health protection has not advanced. EPA risk evaluations have been weak and incomplete, and roundly and repeatedly criticized by the Agency's own science advisory panel; proposals to ban

hazardous uses of three harmful and widely distributed chemicals (methylene chloride, n-methylpyrrolidone and trichloroethylene) have been delayed and withdrawn; chemicals have not been tested for their health effects; and the enhanced review process for new chemicals mandated by Congress has been weakened beyond recognition.

EPA has not only violated TSCA's requirement to protect the most exposed and susceptible communities from toxic chemicals, but it has excluded front-line communities entirely from its risk evaluations, perpetuating historic patterns of environmental injustice and racism. In addition, the science policies adopted (or attempted) by the previous administration – including barring research grant recipients from serving on SAB panels, attempts to thwart the use of both epidemiological and animal studies, and the use of a systematic review method recently rejected by the National Academy of Sciences – all sought to put in place approaches that would fundamentally and permanently undermine public health, and impair the ability of the Agency's science staff to do their jobs. This retreat from the goals of the new law and attempts to undermine the fundamental core of the Agency have been accompanied by privileged access to industry lobbyists, unresponsiveness to public interest advocates and blatant political interference in the work of career EPA scientists.

We call on you to send a clear and unmistakable signal that “business as usual” in the TSCA program will no longer be tolerated. It is time to put public health protection and environmental justice front and center in carrying out the 2016 TSCA amendments. This requires a commitment to use EPA's expanded authorities to the maximum extent to identify, evaluate and eliminate the risks of chemicals and prevent harm to health and the environment.

Our groups have devoted considerable thought to how best to strengthen the TSCA program and have made numerous recommendations to your staff. We look forward to working closely with you and your team to move TSCA in a new direction that reflects the primacy of public health and environmental justice to which you and President Biden are committed.

Sincerely,

Louis Allen, MPH, MD, FAAP
able differently

Pamela Miller
Executive Director
Alaska Community Action on Toxics

Katie Huffling
Executive Director
Alliance of Nurses for Healthy Environments

Linda Reinstein
President
Asbestos Disease Awareness Org

El'gin Avila
Director of Occupational and Environmental
Health and Equity
BlueGreen Alliance

Nancy Buermeyer
Senior Policy Strategist
Breast Cancer Prevention Partners

Robina Suwol
Executive Director
California Safe Schools

Thomas R. Fox
Senior Policy Advisor
Center for Environmental Health

Bobbi Wilding, MS
Executive Director
Clean and Healthy New York

Lynn Thorp
National Campaigns Director
Clean Water Action/Clean Water Fund

Patrick MacRoy
Deputy Director
Defend Our Health

Jonathan Kalmuss-Katz
Staff Attorney
Earthjustice

Rebecca Meuninck
Deputy Director
Ecology Center

Richard Denison
Lead Senior Scientist
Environmental Defense Fund

Melanie Benesh
Legislative Attorney
Environmental Working Group

Charlotte Brody RN
National Director
Healthy Babies Bright Futures

Madeleine Foote
Deputy Legislative Director
League of Conservation Voters

Tracy Gregoire
Healthy Children Project Director
Learning Disabilities Association of America

Gregg French
President
Learning Disabilities Association of Connecticut

Carolyn Kingsley
Learning Disabilities Association of Georgia

Beverley H Johns
President
Learning Disabilities association of Illinois

Ann Johnson
President
Learning Disabilities Association of Maine

Amy Barto, M.Ed.
Healthy Children Project Coordinator
Learning Disabilities Association of Michigan

Dr. Evie Lindberg
President
Learning Disabilities Association of Oklahoma

Deanne Shields
President
Learning Disabilities Association of Utah

Daniel Rosenberg
Senior Attorney & Director of Federal Toxics Policy
Natural Resources Defense Council

Jamie Pang South
Environmental Health Program Director
Oregon Environmental Council

Liz Hitchcock
Director
Safer Chemicals Healthy Families

Ted Schettler MD, MPH
Science Director
Science and Environmental Health Network

Laurie Valeriano
Executive Director
Toxic-Free Future

Genna Reed
Senior Analyst, Center for Science and Democracy
Union of Concerned Scientists

Paul Burns
Executive Director
Vermont Public Interest Research Group

Michelle Naccarati-Chapkis
Executive Director
Women for a Healthy Environment