

December 2, 2020

Alexandra Dapolito Dunn
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
United States Environmental Protection Agency
Washington, DC

Re: Safer Choice Program

Dear Assistant Administrator Dunn,

On behalf of the Endocrine Society, I am writing to express our support for the Safer Choice program and encourage the Environmental Protection Agency to continue to support and invest in this important program. Safer Choice is highly valued by consumers as a way to identify safer cleaning and other household products to better manage their chemical exposure and consequent risks.

Founded in 1916, the Endocrine Society is the world's oldest and largest organization of scientists and clinicians devoted to hormone research and care for people with hormone-related diseases. Our global membership of over 18,000 includes the world's leading experts on the science of EDCs and chemical interference with endocrine systems, as well as scientists and clinicians who study and treat diseases and conditions such as diabetes, thyroid disorders, cancer, infertility, obesity, and bone disease. We have been engaged in efforts to improve science-based regulatory strategies related to EDCs, including implementation of revisions to the Toxic Substances Control Act (TSCA).

We are concerned that reassigning Safer Choice staff to the TSCA program could result in a reduction of activities essential to the function of Safer Choice as it currently exists. To preserve the function of Safer Choice as an effective tool for consumers, EPA must:

Maintain the links between the Safer Choice program and the Office of Pesticide Programs for antimicrobial products: Labeling for antimicrobials is extremely important, given the demand for disinfectants during the COVID-19 pandemic and the need for safer alternatives to quaternary amines which are irritating to the lungs and may have other hazardous effects, including on the endocrine system, yet are listed on the EPA's N List. This should be prioritized for use by facilities or homes where COVID-19 patients or people with lung diseases or disorders could become more susceptible to COVID-19 infection.

Use a hazard-based approach: If Safer Choice is to be situated within the TSCA program, we encourage EPA to adopt the hazard-based approach of the alternatives assessment process into TSCA's chemical reviews such that hazard becomes the driver for the identification of safer



chemicals, requiring chemical companies to utilize safer chemicals if they are known to exist, regardless of exposure.

Expand the Safer Choice Label: EPA should explore expanding Safer Choice beyond cleaning and household products to provide data on hazardous chemicals that may exist in other sectors of the economy that are impacted by TSCA regulatory authority. Making use of expanding data sets under TSCA would allow for the identification of safer alternatives that should be used in place of the most toxic chemicals in products known or predicted to impact public health.

Do not use New/Alternative Methods (NAMs) to rule out hazard: We note that there are currently no NAMs that are appropriate to capture many of the complex biological processes that are hallmarks of hormone signaling, and some outcomes cannot be captured by NAMs at this time. Therefore, if EPA incorporates NAMs in alternatives assessments these should only be used to indicate the presence of hazards, and not be used exclusively to rule out hazard.

In conclusion, we urge EPA to continue to support and strengthen the Safer Choice program by adopting the recommendations above. Thank you for considering the Endocrine Society's comments. If we can be of further assistance, please contact Joseph Laakso, PhD, Director of Science Policy at jlaakso@endocrine.org

Sincerely,

Gary D. Hammer, MD, PhD
President
Endocrine Society