

November 7, 2025

Submitted via regulations.gov to docket EPA-HQ-OPPT-2025-0260

Procedures for Chemical Risk Evaluation Under the Toxic Substances Control Act (TSCA)

The Endocrine Society appreciates the opportunity to comment on the draft Procedures for Chemical Risk Evaluation Under the Toxic Substances Control Act (TSCA). Founded in 1916, the Endocrine Society is the world's oldest, largest, and most active organization dedicated to the understanding of hormone systems and the clinical care of patients with endocrine diseases and disorders. Our membership of over 18,000 includes researchers who are making significant contributions to our understanding of the effects of exposures to manufactured chemicals that interfere with hormone systems – an area of science investigating endocrine-disrupting chemicals (EDCs).

We maintain that to effectively protect the public from harms due to exposures to EDCs, it is appropriate and necessary to include the expertise of endocrine experts who possess a thorough knowledge about what hormones do and how they do it. Unfortunately, the revised draft procedures will prevent EPA from accurately evaluating the harms of EDCs, among other hazardous chemicals, in risk assessments.

The Proposed Rule Decreases Transparency: We are extremely concerned that the proposed rule would allow EPA to revise finalized risk evaluations without public notice, comment, or oversight. This would limit the ability of expert scientists and clinicians to add their expertise to EPA's decision making and prevent the broader public from engaging in decisions that impact public health. Academic scientists, without conflicts of interest, routinely generate data that is underutilized in risk assessments; the inability to utilize all sources of evidence, including data generated by academic scientists, is not considered the gold standard according to international expert bodies¹. Limiting public comment would further prevent EPA from incorporating these and other sources of unbiased data.

The Proposed Rule Weakens Important Protections: To accurately assess hazards from EDCs, it is important to identify all sources of exposure as well as quantify cumulative or aggregate exposures. The proposed rule eliminates requirements for EPA to consider all relevant chemical uses, exposure pathways, and combinations of exposures, without justification or explanation. Such

¹ OECD. 2018. Revised guidance document 150 on standardised test guidelines for evaluating chemicals for endocrine disruption. Paris: Organization of Economic Co-Operation and Development.



changes, again without public input, would limit the information used for assessments and present an incomplete picture of the risks associated with chemicals.

We urge EPA to retain or enhance the current scope of assessments and preserve public comment opportunities on draft assessments to ensure that the agency can efficiently assess chemicals and utilize all relevant sources of data. When choosing to exclude evidence, or when other assumptions are made, these should be transparently justified and also subject to public comment. These actions are essential to protect public health and minimize harm due to EDCs and other hazardous chemicals. Thank you for considering our comments.