

## **EPA's Endocrine Disruptor Screening Program**

### Overview

EPA is required under section 408(p)(5)(A) of the Federal Food, Drug and Cosmetic Act to test "pesticide chemicals" and other chemicals for their potential to interfere with or interact with endocrine systems. In 2008, CPDA submitted comments on EPA's draft documents governing selection of chemicals for testing, conducting the program, and a related information collection request (ICR). In April 2009, EPA published its final list of initial chemicals for testing and the final policies and procedures to implement the initial screening. The Agency also submitted the final program ICR to the Office of Management and Budget (OMB) for approval in accordance with the Paperwork Reduction Act (PRA). CPDA submitted comments on the ICR that focused on EPA's failure to comply with certain requirements of the PRA, and met with OMB to further discuss the concerns expressed in the comments. On October 2, 2009, OMB approved the ICR, and responded very favorably to the concerns expressed by CPDA and other trade associations by imposing significant "Terms of Clearance" on EPA. OMB strongly pointed out to the Agency that the PRA requires it to "promote and encourage" order recipients to submit existing data ("Other Scientifically Relevant Information" or "OSRI") in lieu of conducting the Tier I assays, and that EPA should accept such information in satisfaction of test orders "to the greatest extent possible." Before the Agency can proceed to test additional chemicals, it must provide in a report to OMB a reassessment of the burden (cost) associated with Tier 1 testing of the 67 pesticide chemicals and a justification wherever OSRI was not considered sufficient. Finally, EPA must provide sufficient opportunity for public comment and peer review on specified EPA actions, including revision of the ICR, the draft data evaluation tools, the weight of evidence approach, and evaluation procedures for decisions on whether chemicals should undergo Tier II testing. EPA began issuing test orders in October 2009 and expects to issue all orders for the initial Tier I screening by the end of February 2010.

### Update

CPDA has been organizing a working group of CPDA members to facilitate information exchange on policy development, testing and logistical issues, consortium involvement, and submission of OSRI. CPDA is also engaging in discussions with the Public Health Forum about areas of cooperation among member associations on EDSP issues.