



AMERICAN COLLEGE OF
OCCUPATIONAL AND
ENVIRONMENTAL MEDICINE

Testimony of
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on behalf of the

American College of Occupational and Environmental
Medicine

presented to the

Committee on Environment and Public Works
United States Senate

“Strengthening Public Health Protections by
Addressing Toxic Chemical Threats”

July 31, 2013

Thank you for this opportunity to present comments on the recently introduced Chemical Safety Improvement Act (S. 1009). My comments are made on behalf of the American College of Occupational and Environmental Medicine (“ACOEM”), but they also reflect my strongly felt personal views.

Allow me first to introduce myself and ACOEM. The American College of Occupational and Environmental Medicine (ACOEM) is a professional organization of more than 4,000 occupational physicians and other health care professionals. ACOEM provides leadership to promote optimal health and safety of workers, workplaces, and environments.

As for myself, I am Clinical Professor of Epidemiology & Public Health and Clinical Professor of Medicine at Yale University, a faculty member of the Yale Occupational and Environmental Medicine Program, and Adjunct Associate Professor of Medicine at The Johns Hopkins University. Among my Yale activities, I direct and teach required graduate-level courses in Toxicology and Risk Assessment.

The following provides an overview of my background and professional activities.

- I am Board Certified in Internal Medicine, Preventive Medicine (Occupational Medicine) and Toxicology (American Board of Toxicology) and I am a Fellow of the American College of Occupational and Environmental

Medicine, the American College of Physicians, the Royal College of Physicians of Canada, the Academy of Toxicological Sciences, and the American Industrial Hygiene Association.

- I am a member of the Editorial Boards of Journal of Occupational and Environmental Medicine, Journal of Occupational and Environmental Hygiene, and Occupational Medicine. I have authored and/or edited numerous books and scientific articles addressing the human health effects of industrial chemicals.
- I was a founding member of US EPA's National Advisory Committee to Develop Acute Exposure Guideline Levels for Hazardous Substances, a member of the National Research Council Committee on Toxicologic Assessment of Low-Level Exposures to Chemical Warfare Agents, and a member of a National Institute of Environmental Health Sciences review panel on Partnerships for Environmental Public Health.
- I served as an elected Director of ACOEM, as Chair of the ACOEM Council on Scientific Affairs, and as a member of numerous ACOEM councils and committees. I was also President of the Occupational and Environmental Medicine Association of Connecticut, and Chairman of the Connecticut State Medical Society Committees on Preventive Medicine and Emergency Medical Services.

The Chemical Safety Improvement Act ("CSIA") represents an important and overdue upgrade of the current Toxic Substances Control Act ("TSCA"). Most importantly, it

provides a mechanism that allows the EPA to more effectively identify and label those chemicals in commercial use that pose potentially significant risks of harm to health and the environment.

The CSIA requirement that EPA review all chemicals in commerce addresses the significant flaw in the current TSCA that allows a majority of commercial chemicals in be grandfathered without sufficient review of their potential risks.

The stratification of chemicals into two groups, “high” and “low” priority will be an efficient, albeit simple way, to prioritize those chemicals that may prove harmful and that deserve additional safety measures, ranging from additional warnings and labels to outright usage bans. By establishing such chemical-specific priorities, greater scrutiny and research efforts can be focused on those particular agents for which such efforts are most needed.

In addition, CSIA specifically addresses concern about vulnerable populations, most notably children and also pregnant women and their fetuses. The current TSCA does not require EPA to consider the particular effects of chemical on such vulnerable individuals.

It must also be acknowledged that while CSIA is a necessary step in the process of modernizing TSCA and, more generally, in the enhancement of the process by which chemicals are regulated in the United States, it is neither perfect nor complete. It would be improved by the setting of performance deadlines and the establishment of measures to monitor and ensure that safety measures are adequately protective of

vulnerable populations, including workers and others with risks of unique or significantly greater-than-ambient exposure levels.

Nevertheless, as currently written, CSIA is an important step in addressing and correcting serious flaws in the current Toxic Substances Control Act. It is also an example of the substantial benefits that we all derive from bipartisan legislative cooperation.

Accordingly, ACOEM is urging support for the Chemical Safety Improvement Act because it is an important step forward towards modernizing the Toxic Substances Control Act (TSCA), which is seriously flawed and needs fundamental reform.

I look forward to answering your questions.