

July 25, 2013

The Honorable David Vitter U.S. Senate Washington, DC 20510

Dear Senator:

On behalf of the American College of Occupational and Environmental Medicine (ACOEM), I am writing to commend you and the bi-partisan group of Senators for introducing the legislation, S.1009, the Chemical Safety Improvement Act.

ACOEM, an organization of more than 4,000 occupational physicians and other health care professionals, provides leadership to promote optimal health and safety of workers, workplaces, and environments.

The Chemical Safety Improvement Act would for the first time require that EPA review the safety of all chemicals in commerce. This fixes a significant flaw in current TSCA, which allowed the great majority of chemicals on the market today to be grandfathered in without any evidence of their safety.

This legislation takes a common sense approach to enforcement by evaluating all chemicals in current commercial use and labeling them either "high" or "low" priority based on their potential environmental and health risks. This approach means that the EPA will be placing greater scrutiny on the chemicals that might actually be harmful, while streamlining the approval path for those that are safe. It would also implement a process for the review of new chemicals.

If a chemical is found to be unsafe, the CSIA gives new tools to the EPA to protect our health. It gives the EPA the authority to take safety measures that range from requiring labels to completely banning the use of a chemical. And the CSIA takes special measures to protect the most vulnerable among us. It would require the EPA to evaluate the risks posed to children and pregnant women when determining whether a chemical is safe. Current law does not require specific consideration of the effects of chemicals on vulnerable populations.

There are aspects of the bill that need to be strengthened, including ensuring that safety determinations indeed protect vulnerable populations from exposure; setting deadlines to direct EPA to initiate and complete actions; and increasing EPA's ability to

address disproportionately high exposures to chemicals in some communities. We look forward to working with you and your Senate colleagues to address these issues. On balance, however, ACOEM is urging support for the Chemical Safety Improvement Act because it as needed to modernize the Toxic Substances Control Act (TSCA), which is seriously flawed and needs fundamental reform.

Please do not hesitate to contact me at 847-818-1800 or Pat O'Connor, ACOEM's Director of Government Affairs, at 202-223-6222, if you and your staff have any questions or need additional information.

Again, thank you for your leadership.

Sincerely,

Ronald R. Loeppke, MD, MPH, FACOEM

RonkLopplems

President