



Walter Wright, Jr.
wwright@mwlaw.com
(501) 688.8839

U.S. Senate Subcommittee on Regulatory Affairs and Federal Management: American Chemistry Council Testimony on Use of Science in the Rulemaking Process

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The Subcommittee on Regulatory Affairs and Federal Management of the United States Senate Committee on Homeland Security and Governmental Affairs ("Subcommittee") held a March 9 hearing on the:

... Agency use of science in the rulemaking process and proposals for improving transparency and accountability.

The witnesses included testimony by Ms. Nancy B. Beck, Ph.D., DABT, who serves as Senior Director of Regulatory and Technical Affairs for the American Chemistry Council ("ACC").

Ms. Beck's testimony includes examples of where ACC believes scientific information in the rulemaking process has been inadequate. Her testimony also outlines proposals that ACC believes agencies can employ that improve transparency and accountability.

Other topics addressed in her witness statement submitted to the Subcommittee include:

- The Need for Confidence In Science
- Tools and Standards Exist to Improve Agency Science
- Information Quality Guidelines
- Memorandum on Updated Principles for Risk Analysis
- Non-governmental Reports on Approving Science and Regulations
- Improving Peer Review
- Improving Systematic Review
- Data Access and the Protection of Confidential Business Information
- Science Standards in the 2016 Lautenberg Chemical Safety Act
- Potential Solutions to Improve Agency Science
- Improve and Clarify Scientific Definitions
- Improve Oversight and Develop Quality Checklists
- Improve Peer Review Practices
- Change Publication Incentives and Standards for Scientific Grants and Funding

The testimony also provided what it characterizes as case examples of “Scientific Concerns with Federal Science Evaluations.” The case examples included:

- Occupational Safety and Health Act Crystalline Silica PEL
- EPA IRIS Assessment of Trimethylbenzenes
- NIOSH Cancer Policy
- EPA IRIS Assessment of Ethylene Oxide
- National Ambient Air Quality Standard for Ground-Level Ozone

[Copy of Dr. Beck’s written testimony can be downloaded here.](#)