

Senate Proposal to Eliminate EPA IRIS Program is a Debacle for Chemical Safety Efforts and Public Health

IRIS provides critical scientific underpinning for EPA's basic functions

EPA's Integrated Risk Information System (IRIS) program provides essential assessments of chemical toxicity. IRIS Program experts provide critical scientific analysis of chemicals to support decision-making throughout the entire agency and in the states.

IRIS reviews are foundational to understanding the health impacts of toxic chemicals

All of EPA's activities on chemicals require understanding what, if any, hazards a chemical poses at what levels of exposure. IRIS assessments identify hazards presented by a chemical and the relationship between exposures and the identified hazards. These assessments are relied upon by EPA program and regional offices as well as other agencies and states. For example:

- EPA's Office of Land and Emergency Management relies on IRIS for clean-up decisions at Superfund and hazardous waste sites. OLEM does not conduct its own chemical assessments.
- EPA's Office of Air and Radiation uses IRIS assessments for Risk and Technology Reviews (RTR) under the Clean Air Act.
- EPA's Office of Chemical Safety and Pollution Prevention (OCSP) uses IRIS assessments in conducting risk evaluations under the newly reformed Toxic Substances Control Act (TSCA).
- EPA's Office of Water uses IRIS assessments to set health advisories, maximum contaminant levels, and for other actions to protect drinking water.
- EPA regions, states, and tribes rely on IRIS for a wide variety of activities including contaminated site cleanup decisions and advice during emergency and rapid response situations.

The Senate funding measure would eliminate IRIS, shift a portion of its duties, and slash funding

The Senate's proposal would eliminate the IRIS Program and shift at most a small subset of the program's responsibilities to OCSP. In doing so, it would also effectively cut its budget for chemical assessments by two-thirds.¹ IRIS Program experts would be reassigned. These changes would eliminate much of IRIS' current work and severely impair the ability of federal, state, local and tribal governments to fulfill core public health functions.

¹ The "Research: Chemical Safety and Sustainability" budget decreases by \$15.295 million, while the Toxics Risk Review and Prevention increases by \$5.638 million. This represents a 63% reduction in funding for chemical assessments.

Industry critiques of IRIS do not reflect impartial reviews

Critics of the IRIS Program have long complained about the quality of its work, citing for support past reviews by GAO and the National Academy of Sciences (NAS). However, recent impartial critiques of the program have given it high marks. The most [recent NAS review \(2014\)](#) praised the program for improvements made over a short period of time. The EPA Science Advisory Board's [review of the IRIS program](#) echoed the same sentiments just this past summer and also noted that no other federal entity performs IRIS functions.

Remaining critical reviews, [such as the program's listing on the "high-risk" list maintained by GAO](#), have identified the main concern as insufficient resources and output, not quality.

Eliminating IRIS and shifting its responsibilities is neither efficient nor sound

Eliminating the IRIS Program would not eliminate statutory requirements for EPA to regulate chemicals under multiple laws. Instead, this would severely curtail the EPA's ability to carry out its fundamental responsibilities Congress has given the agency—the very work that Administrator Pruitt cites as part of his “back-to-basics” agenda. Removing the program would also have significant ramifications for regions, states, localities and tribes that rely on IRIS assessments and staff to protect public health.

IRIS was created in 1985 to address the confusion that arose previously when different EPA programs conducted separate assessments that resulted in inconsistent results. Moving IRIS to OCSPP would cost the EPA expertise that serves the entire agency. The move would also sever the independence between scientific review and regulatory decisions related to such reviews. Per EPA's website: “The placement of the IRIS Program in ORD is intentional. It ensures that IRIS can develop impartial toxicity information independent of its use by EPA's program and regional offices to set national standards and clean up hazardous sites.”

Putting IRIS on a sound footing

Rather than cutting funds or disbanding the diverse scientists who make up the IRIS program, this program should be provided additional resources to allow it to successfully fulfill its existing mission, while supporting new responsibilities such as those under reformed TSCA. IRIS should remain in ORD and focus on its core mission, without undue influence from regulators, and with the ability to serve the needs of the many consumers of its expertise.