

February 3, 2010

The Honorable Barbara Boxer  
Chair, Senate Committee on Environment and Public Works  
410 Dirksen Senate Office Building  
Washington, DC 20510-6175

The Honorable James Inhofe  
Ranking Member, Senate Committee on Environment and Public Works  
456 Dirksen Senate Office Building  
Washington, DC 20510-6175

Re: “Current Science on Public Exposures to Toxic Chemicals”

Dear Chairwoman Boxer and Ranking Member Inhofe:

On behalf of the Society of Chemical Manufacturers and Affiliates (SOCMA), I would like to share with you our perspective on the subject of your hearing this week: exposure to chemicals, with an emphasis on reforming the Toxic Substances Control Act (TSCA). Since 1921, SOCMA has served as the leading trade association representing the batch and custom chemical industry. SOCMA has over 300 member companies, which are typically small to medium-sized businesses, each with up to \$100 million in annual sales. Our members make a \$60 billion annual impact on the U.S. economy and contribute to the chemical industry’s position as one of the nation’s largest exporters.

Since the enactment of TSCA, technological advancements have greatly changed how we view chemicals management. We have seen the emergence of biotechnology and nanotechnology. Improvements in quantitative analytical chemistry have given us the ability to detect decreasingly low amounts of chemicals in the body, at the same time as there have been improvements in the detection of disease and illness. Equally important, media outlets have put increasing emphasis on reporting certain aspects of exposures to everyday chemicals and the internet has provided people with instant access to vast amounts of information. All of these factors have created a heightened awareness of – and fear about – chemical exposures, particularly among consumers and the general population.

SOCMA believes that the degree of this public concern about the health risks of chemical exposures is not justified by what we currently know. This is largely because most of the information people are provided does not accurately track the views of knowledgeable scientists. In a recent study by STATS and George Mason University’s Center for Health and Risk Communication, nearly 1,000 surveyed toxicologists--scientists who study the adverse effects of

chemical or physical agents on living organisms--opined that recent media and nonprofit coverage of everyday chemical exposures vastly overstates their health risks. These scientists also overwhelmingly reject the notions that exposure to even the smallest amounts of harmful chemicals is necessarily dangerous or that the detection of any level of a chemical in your body by biomonitoring indicates some degree of health risk.

SOCMA agrees that we should act to fill the knowledge gaps that exist regarding chemical exposures and risks, and our members have been working hard to do so. Our industry has become increasingly involved in product stewardship, with a greater focus on chemical testing and basic research. Fortunately, these same efforts and new innovative techniques have also resulted in improvements in the physical sciences, an improved standard of living and, we believe, longer and healthier lives for everyone.

SOCMA supports efforts to update TSCA, which has had little Congressional oversight and not been fully implemented by EPA in its 30-year history. We also believe that reform will be most successful if it is fundamentally informed by science and a careful assessment of risk. TSCA reform must also be accomplished in a way that doesn't cripple a strategic American industry that is fighting recession and foreign competition. We believe this is possible, and we look forward to working with the Committee on this important task.

Sincerely,



William E. Allmond IV  
Vice President, Government Relations & ChemStewards®

cc. Environment and Public Works Committee