

ATTACHMENT 1

EXISTING CMA POLICY  
ON THE  
OECD HPV EXISTING CHEMICALS TESTING PROGRAM

In September 1989, the CMA Board of Directors adopted the following policy on the OECD Existing Chemicals Testing Program:

CMA and its member companies support the concept of international cooperative testing to ensure adequate assessment of health risks for existing chemicals. Such testing is consistent with the Guiding Principles of Responsible Care. CMA will promote equitable apportionment of testing responsibility among countries through the OECD Existing Chemicals Program. CMA believes a screening approach to chemical testing is appropriate for developing data needed for directing priorities for further testing. Results of screening however, should not be used for regulatory control purposes.

When this policy was approved, the Board also approved criteria that the OECD Program must meet for continued CMA involvement (progress to date in meeting each criteria is indicated):

1. The Screening Information Data Set (SIDS) must adequately represent a screening approach to chemical testing.  
(Progress to date: A SIDS, developed with significant input by and supported by U.S. industry, was formally adopted by the OECD in May 1990.)
2. Prior to any testing, all producers and users of a HPV chemical in OECD member countries will be surveyed and requested to make available unpublished data on the chemical. This data may reduce or obviate the need for further testing.  
(Progress to date: Data sharing efforts began in April 1990. U.S. producers and EPA have provided existing data to appropriate national SIDS contacts. It has been difficult to obtain full reports from other countries. This stumbling block must be resolved prior to beginning Phase II.)
3. International testing programs and costs must be equitably applied and well-coordinated within OECD member countries.  
(Progress to date: Fourteen of the twenty-four OECD member countries are participating in the pilot phase of the SIDS program.)
4. International testing programs must be well-coordinated with regulatory testing programs of each OECD country.  
(Progress to date: EPA has recognized the role of the OECD program by placing the 53 pilot phase chemicals on its master testing list, an inventory of current Agency testing activities. It is too early to tell whether the OECD program will be fully integrated with U.S. or other national regulations.)

5. Data developed by the OECD testing program should be accepted by regulatory agencies of all OECD countries.  
(Progress to date: This is integral to the OECD program as currently structured. November 1990 OECD meetings will provide the first opportunity to evaluate this criteria.)
6. The OECD screening testing set should be integrated into U.S. testing requirements to ensure adequate and consistent chemical assessment. If the U.S. chooses to mandate testing, the current TSCA Section 4 procedures are not viable because of inflexibility in testing methodology and timing constraints. These procedures must be modified to permit accomplishment of testing consistent with the goals of the international cooperative effort.  
(Progress to date: EPA is developing new strategies for existing chemicals testing under TSCA. There are informal indications that the Agency may adopt the OECD approach for prioritizing its testing program. It is too early, however, to fully evaluate if significant change in TSCA Section 4 procedures will occur.)
7. An initial pilot program covering a small set of chemicals, i.e., 15-25, should be conducted. Testing on the pilot chemicals should be equitably assigned.  
(Progress to date: A pilot phase is being conducted that includes 53 chemicals; U.S. producers are taking the lead on 9 chemicals.)

As part of the policy approval, the Board also indicated the need to evaluate CMA's policy on the OECD Program as the pilot program progressed.

Additionally, CMA's Officers approved management of the pilot phase of the OECD Program under the auspices of the Health and Safety Committee's OECD Existing Chemicals Ad Hoc Group. This approach was predicated on individual companies taking lead responsibility for specific chemicals, including commitments for funding of any necessary SIDS testing (or developing cost sharing arrangements independently of CMA).

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