

ATTACHMENT III

RATIONALE FOR CMA POLICY  
AND PROPOSED RESPONSE TO EPA REGARDING TRI CHEMICALS

A general CMA policy on voluntary development of health, safety and environmental information in response to requests by regulatory agencies and others will:

- o Provide guidance to CMA and its member companies on how and when to participate in voluntary development and submission of health, safety and environmental information;
- o Create a level playing field for voluntary programs through consistent guidance to member companies;
- o Allow CMA to advocate a more flexible approach for providing health, safety and environmental information to regulatory agencies and others;
- o Potentially avert restrictive regulatory actions and legislative initiatives;
- o Help generate consistent, predictable, constructive responses from CMA and its member companies on this issue;
- o Demonstrate cooperation between regulatory agencies and CMA; and
- o Enhance the reputation of CMA and its member companies with government and the public.

EPA has proposed using the OECD SIDS dossier for summarizing the available information on selected TRI chemicals. Use of a consistent format with standard information elements, such as the SIDS dossier, for presenting information on industrial chemicals would:

- o Promote global acceptance of a format with widespread utility;
- o Allow for industry, government and public interest input during preparation, revision and approval of the information;
- o Allow industry to gather all information on a specific chemical in an organized format before submission to regulators; and
- o Promote improved management of information by EPA and other agencies.

Conversely, use of a standard format may reinforce a "check the box" approach for developing information on chemicals. In addition, a standard format may not provide enough flexibility to indicate when a data gap can be filled with information from structurally similar compounds or does not need to be filled because the data are not necessary for making risk management decisions.

Voluntary preparation by manufacturers of standard dossiers, such as the SIDS dossier, would allow industry to take the lead and greatly influence the process. Industry's trained product specialists and toxicologists are knowledgeable about health, safety and environmental data on industrial products. Industry preparation of dossiers will help ensure the accuracy of the data and its interpretation. While industry preparation of dossiers may be resource intensive, erroneous data in agency or public files is potentially damaging and costly to correct.

Voluntary testing by manufacturers to complete standard dossiers would publicly demonstrate industry's willingness to develop information on industrial chemicals in a prioritized way. Voluntary testing programs will give industry a voice in prioritizing needed testing and help prevent unrealistic testing deadlines. Participation in voluntary testing programs will strengthen the industry's advocacy position with EPA and could positively impact the Agency's regulatory testing agenda. Burdensome changes to TSCA, such as a mandated list of chemicals for base set testing, may be averted because of industry support of these voluntary programs.

CMA supports the integration of EPA's efforts to develop SIDS dossiers on TRI chemicals into an international program like the OECD HPV Program. Our support is consistent with the objectives set forth in CMA's OECD Existing Chemicals Testing Program policy: to promote international harmonization of testing requirements; ensure mutual acceptance of data; and, share the burden of regulatory testing costs.

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