

June 10, 2020 (updated June 15 with additional signatures)

The Honorable Roger Wicker
Chairman
Committee on Commerce, Science,
and Transportation
United States Senate
555 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Maria Cantwell
Ranking Member
Committee, on Commerce, Science
and Transportation
United States Senate
511 Hart Senate Office Building
Washington, DC 20510

Dear Chairman Wicker and Ranking Member Cantwell:

We write this letter – supported by over 90 scientists - to express our opposition to the White House nomination of Nancy Beck to Chair the U.S. Consumer Product Safety Commission (CPSC).¹

Nancy Beck is currently detailed to the White House, where she is empowered to oversee the chemical evaluations that she was in charge of developing while serving as the political head of the EPA's Office of Chemical Safety and Pollution Prevention (OCSPP).² In that role she led the implementation of the revised Toxics Substances Control Act (TSCA), updated in 2016 by Congress to ensure that chemical substances and mixtures are evaluated and regulated so as not to present an unreasonable risk to human health or the environment, including infants, children, pregnant women, workers, and the elderly.³

Under Beck's leadership, her office issued a TSCA Systematic Review document that was strongly criticized by scientists:

"The EPA officially calls the method a "systematic review" framework for TSCA, but it is systematic in name only, as it falls far short of best practices for systematic reviews. Application of the TSCA method will exclude relevant research from chemical assessments, leading to underestimation of health risks and resulting in inadequate policies that allow unsafe chemical exposures, thus harming public health. The TSCA systematic review method could be especially detrimental for populations more vulnerable to chemical exposures, such as pregnant women and children."⁴

Among its many flaws, Beck's notion of a "systematic review" incorporates one of her most harmful policy positions – to discount epidemiologic evidence if all the raw data (including information on individual study participants) are not made public. Beck argued for this in public comments to EPA, while she was still working for the American Chemistry Council, the chemical industry trade association, immediately prior to her move to EPA.⁵

Beck's dangerous and unscientific policy – to discount relevant evidence from human populations – is also at the center of EPA's discredited so-called 'Science Transparency Rule' that was strongly criticized by experts including academic scientists, EPA's own Science Advisory Board, and the Bipartisan Policy Center, among others.⁶ In fact, "[E]ditors-in-chief of five major scientific journals in May 2018, reflected alarm that the proposal's push for 'transparency' would be used as a mechanism for suppressing the use of relevant scientific evidence in policy-making, including public-health regulations."⁷ Even The Economist opposed the rule, in an editorial titled 'Swamp Science' emphasizing that it would stifle

science, and hamstringing health protective regulations.⁸ In summary, Beck's views are long-standing and inconsistent with scientific best practices.⁹

Beck's approaches consistently disregarded scientific best practices, favor chemical manufacturers, and put vulnerable populations in harm's way. As one of her first acts at EPA, Beck refused to finalize the 2017 proposed ban on methylene chloride (MC) in paint strippers for consumer uses and most commercial uses. Four people died of MC asphyxiation between the time the ban was proposed and when EPA finally took partial, inadequate action. When Beck's office did ultimately finalize the ban, after a two-year delay, it excluded commercial products, thus stripping worker protections.¹⁰

Nancy Beck's disregard for worker protections also runs through the TSCA chemical evaluations that she oversaw. The TSCA chemical risk evaluations - including TCE, methylene chloride, 1,4 dioxane, carbon tetrachloride and 1-bromopropane - presume that personal protective equipment (PPE) is available, in good working condition, provided to all workers that need it, fitted properly, used consistently, and adequately protective in all situations of workplace exposure to chemicals. However, EPA's Scientific Advisory Committee on Chemicals (SACC) has repeatedly underscored that an expectation of universal and effective PPE use is in fact contrary to the scientific evidence of real-world workplace practice and contrary to established principles of worker protection:¹¹ *"[M]any members of the Committee believed EPA should place more emphasis on the limited likelihood that respiratory protection will be adopted without specific occupational exposure guidelines . . . EPA's characterization of reasonable risk relying on use of PPE is not sufficiently supported by the practical realities of many workplaces,"*¹² Yet, EPA has maintained that it will continue this unscientific and unprotective approach in its upcoming chemical assessments, including for formaldehyde: *"EPA also plans to consider the effect(s) that engineering controls (EC) and/or personal protective equipment (PPE) have on occupational exposure levels as part of the draft risk evaluation."*¹³

EPA's fictitious assumption of 100% PPE availability use is only one of numerous policy decisions made by Nancy Beck that are contrary to scientific practice and undermine protection for children, consumers, first responders and other workers. A federal court overturned the decision by Beck's office to unlawfully exclude common sources of exposure to lead and asbestos - two of the most notoriously dangerous chemicals known to science - from TSCA risk evaluations.¹⁴ Beck's approach would have ignored exposures to leaded paint, lead water pipes, asbestos insulation, and other toxic consumer products. Beck's unwillingness to include a half-century of scientific evidence on the health harms of even low levels of lead and asbestos in her office's risk evaluations is deeply disturbing.

The risk evaluations prepared under Beck's leadership have also failed to consider the potential impacts of exposure to chemicals from drinking water, air pollution, and contaminated soil - justifying this exclusion by claiming that other environmental statutes address these exposure pathways. Here again, EPA has refused to alter its unscientific approach, despite repeated criticism from the Agency's own Scientific Advisory Committee on Chemicals: *"Exposure scenarios that include consumers are important given the known presence of 1,4-Dioxane in plastics, other commercially available products, surface water, drinking water, groundwater, and in sediments. The Committee also had concerns that the omission of these multiple routes of exposure puts workers who inhale or ingest 1,4-Dioxane outside the workplace at even greater risk."*¹⁵ The Science Advisory Committee further noted that this exclusionary approach, "strayed from basic risk assessment principles by omitting well known exposure routes such as water consumption by all occupationally and non-occupationally-exposed humans as well as similar exposures to other biological receptors."¹⁶ The Scientific Advisory Committee on Chemicals similarly

pushed back on Beck's EPA in its review of 1-Bromopropane for failing to include air emissions and other environmental releases.¹⁷

EPA's pesticide office also fell under Beck's leadership, where she withheld needed protection for children, agricultural workers and rural communities by blocking the proposed cancellation of the neurotoxic organophosphate pesticide chlorpyrifos.¹⁸ Prenatal exposure to chlorpyrifos is linked to neurodevelopmental disorders including impaired cognition, behavioral problems, and delayed social development in children.¹⁹


Under Beck's leadership, EPA delayed children's protections for lead by failing to update the hazard standard for lead paint – contrary to decades of scientific evidence showing harm, and in violation of a federal court order.²⁰

And, under Beck's leadership, EPA failed to take meaningful action to address the crisis of PFAS chemicals that contaminate our drinking water, food, and consumer products. Beck had the authority to take numerous steps to gather additional information, inform the public and impose restrictions on the use of PFAS – but she did none of those things. Congress has been forced to step in and require action by EPA, yet even the records released illustrate Beck's attempts to weaken those actions mandated by Congress.

If she was confirmed as Chair of the Consumer Product Safety Commission, Nancy Beck would be in a position to rollback important consumer protections including the CPSC's planned rulemaking to limit toxic flame retardant chemicals in furniture including children's products;²¹ and, the CPSC's recently adopted bans on certain phthalate chemicals in toys and other children's products.²² These classes of chemicals are linked to reproductive impairment, neurological impacts, and disruption of critical hormones. The CPSC's actions are supported by a decade of scientific evidence, expert peer review and multiple opportunities for stakeholder and public comment.

The Consumer Product Safety Commission must provide important public protections from dangers associated with consumer products including toys, children's products, home furnishings, cleaning supplies, and some building materials. There is no place for Nancy Beck in such an Agency.

Respectfully,

A handwritten signature in cursive script that reads "Jennifer Sass".

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A New Face at the CPSC? White House to Nominate Dr. Nancy Beck as Chair. The National Law Review, March 3, 2020 <https://www.natlawreview.com/article/new-face-cpsc-white-house-to-nominate-dr-nancy-beck-chair>

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¹¹ Information for all the EPA Science Advisory Committee on Chemicals (SACC) meetings, including final reports, can be found on EPA's webpage at <https://www.epa.gov/tsca-peer-review/science-advisory-committee-chemicals-meetings>

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