



Endocrine Disruptor Screening Program

The Issue

The U.S. Environmental Protection Agency (EPA) issued Test Orders for Tier I (the first phase of testing) of the Endocrine Disruptor Screening Program (EDSP) to industry in October 2009 as a requirement under the Federal Food Quality Protection Act in 1996. EDSP Tier I screening is intended to “identify chemicals that have the potential to interact with the endocrine system,” particularly the estrogen, androgen and thyroid pathways. Candidate chemicals for EDSP were not chosen because they are suspected of being endocrine disruptors, but rather based on their use and potential for exposure. EPA states, “[t]his list should not be construed as a list of known or likely endocrine disruptors. Nothing in the approach for generating the initial list provides a basis to infer that simply being on this list these chemicals are suspected to interfere with the endocrine systems of humans or other species, and it would be inappropriate to do so.” For List 1, EPA focused on pesticide candidate chemicals and identified 67 substances to be tested (58 pesticide active ingredients and nine pesticide inert ingredients), was published in the Federal Register in April 2009. Tier 1 testing of List 1 is expected to be completed by industry in 2012. In November 2010, EPA proposed a second list of candidate substances for Tier I testing focusing on chemicals that EPA calls “priorities within EPA’s drinking water and pesticides programs.” The final List 2 is expected to be released sometime in 2012.

CropLife America’s (CLA) Outlook

1. CLA supports a cooperative effort on EDSP among those subject to the Tier I Test Orders (pesticide registrants and inert suppliers, chemical manufacturers and importers) and EPA.
2. Sound scientific principles in the requirements for evaluation of the screens and tests under EDSP must be employed by EPA.
3. EPA must provide clarification on EDSP data use and the mechanism by which the data and EPA’s analysis of the data will be made public.

Talking Points

- Candidate chemicals for the EDSP should not be considered as possible or likely endocrine disruptors as these substances were *not* chosen for the program based on any specific toxicological or risk concerns.
- EPA Test Orders for the substances on List 1 of the EDSP are expected to be completed in in 2012.
- EPA is expected to issue the EDSP List 2 substances for screening in 2013.
- EPA guidance on the analysis of the Tier I data and the weight of evidence approaches are needed.
- EPA must ensure that validated scientific approaches are consistently employed in the evaluation of the Tier I EDSP data and the requirements for determination of further testing, if needed.
- Positive results in Tier 1 testing should not cause a chemical to be classified as an endocrine disruptor as these are only screening studies.