

US EPA ARCHIVE DOCUMENT

Comments on:  
Review of Environmental Protection Agency Public Participation Policies

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The Humane Society of the United States (HSUS) would first like to thank the EPA for working with animal protection organizations and other stakeholders on the High Production Volume (HPV) Chemicals program. The announcement made on October 14, 1999 of the changes to the HPV program, which came as a result of the collaborative effort, was very encouraging. Due to its success, this effort should serve as a template for future testing programs. However, we would like to point out that initially, the EPA failed to sufficiently involve the public in the development of this testing program. It also seems as if there are similar problems with the Endocrine Disrupter program. We would like to take advantage of the EPA's public comment period on public participation policies to briefly address these issues.

The HPV program initially called for the testing of chemicals on hundreds of thousands of animals and would have been the largest animal testing program in history. Animal protection organizations were originally excluded from the development of this program and the EPA, Environmental Defense Fund, and Chemical Manufacturers Association were the sole contributors. Page 10 of the Final EPA Policy on Public Participation states "Public participation must begin early in the decision-making process and continue throughout the process as necessary. The agency must set forth options and alternatives beforehand, and seek the public's opinion on them. Merely conferring with the public after a decision is made does not achieve this purpose." The steps taken in the HPV program did not follow this policy.

Furthermore, the fact that animal organizations were initially unaware of a massive animal-testing program indicates that the public was not sufficiently informed. The animal groups did indirectly become aware of the program and became involved. The contribution of these groups to the structure of the program proved to be valuable, important to the health of humans and saved the lives of thousands of animals.

The HSUS and other animal protection organizations are also encountering problems in seeking to participate in the Endocrine Disrupter testing program, which has the potential to kill upwards of 100 million animals. We have had difficulty finding out about relevant meetings; a meeting this week is closed to observers from the public.

The *Federal Register* is one effective tool for the dissemination of information about EPA programs. However, we would like to point out that a *Federal Register* notice about the HPV program was not published. We request that all future EPA programs involving animal testing be published in the *Federal Register*.

We would also like to suggest that the EPA offer an electronic mailing list service. The public could then sign up to be on the list and the EPA could disseminate information about meetings, program announcements, etc., through electronic mail. This would be a simple, cost-effective way of distributing information.

Thank you for giving us the opportunity to comment on the public participation policies of the EPA. An increase in stakeholder participation in EPA programs will expand the expertise contributed to the wide variety of issues that the EPA deals with. We are looking forward to collaborating with the EPA on the Children's Health Initiative and other programs.