Principles for a Modernized Chemicals Policy: Strong Regulations Start with Modern Science

Chemicals are regulated based on their potential for causing harmful effects; therefore, whether and how toxicity testing is conducted is an essential cornerstone to any chemical safety legislation, and we need to ensure it is laid down correctly.


The recommendations below will ensure an efficient testing process now, and lay the foundation for a more efficient, protective, and humane testing paradigm in the future.

**A Strategic, Flexible Approach to Assessment and Testing Requirements**

The existing inventory of chemicals should first be grouped by structure and/or effect to efficiently identify priorities for assessment and testing and take advantage of read-across.

A minimum data set for all chemicals should be avoided. Testing requirements for new and existing chemicals should be tailored by applying a flexible testing strategy that uses a “weight-of-evidence” analysis of the available information.

Prioritization and testing of chemicals should be based on exposure and/or biological effect; non-animal tests should be used to prioritize the most toxic chemicals.

**Minimize Animal-Based Testing**

- Require new and existing non-animal methods to be used in place of animal methods as they are developed and available; methods that use fewer animals should also be required.

- Request EPA make efforts to develop and implement non-animal test methods, and update Congress on its progress through regular review and reporting.

- Provide for publication of all available safety information on chemicals considered for regulation, and plans for testing, before any new testing takes place.

- Require coordination and data-sharing between EPA and the regulatory agencies of other regions, especially with regard to REACH and other comprehensive testing programs.