Congress of the United States

Washington, DC 20515

April 1, 2025

The Honorable Lee Zeldin
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator Zeldin:

Chemicals are at the heart of virtually everything made in America, from autos to semiconductors. Because chemicals are at the foundation of American manufacturing, it is important that regulatory decisions on chemicals are grounded in sound science. However, in recent years EPA's Integrated Risk Information System (IRIS) has been weaponized to justify overreaching regulations with far reaching implications for American manufacturers and consumers, economic competitiveness, and our national security. This is why we recently introduced the "No IRIS Act" (S. 623/H.R. 1415), which would prevent EPA from using IRIS as the basis for rulemaking.

IRIS has been criticized for a lack of transparency and accountability and has fallen short of scientific standards statutorily required of EPA. The program has been criticized for failing to incorporate high quality science and not utilizing a "weight of the scientific evidence" approach. The U.S. Government Accountability Office (GAO) has included IRIS on its list of high-risk programs since 2009.

IRIS has also never been Congressionally authorized. The executive order entitled "Ensuring Lawful Governance and Implementing the President's 'Department of Government Efficiency' Deregulatory Initiative" issued on February 19, 2025, directs agencies to review regulations and guidance documents to ensure adherence to statutory requirements. The order also directs agencies to rescind or modify regulations that meet certain criteria, including:

> "(v) regulations that impose significant costs upon private parties that are not outweighed by public benefits;
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> (vi) regulations that harm the national interest by significantly and unjustifiably impeding technological innovation, infrastructure development, disaster response, inflation reduction, research and development, economic development, energy production, land use, and foreign policy objectives; and
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> (vii) regulations that impose undue burdens on small business and impede private enterprise and entrepreneurship."

We urge you to consider the harmful impact of the IRIS program on recent EPA decisions and its broader influence on chemical, air, and water regulations as you undergo this review.

Recent history shows the real-world implications of how IRIS assessments can be used. Among others, the Biden Administration and Courts used precautionary IRIS assessments to take emergency action to shut down

CC Russell Vought, Director, Office of Management and Budget

operations under Section 303 of the Clean Air Act[1]; delay or deny permits for projects; displace scientific quality requirements for the risk evaluation process under the Toxic Substances Control Act (TSCA)[2]; and accuse states of violating Title VI of the Civil Rights Act[3].

If this unauthorized program is allowed to continue, it will have a significant negative impact on American manufacturing jobs, disrupt critical supply chains, and send jobs overseas.

We appreciate the steps EPA is taking to reduce duplication and ensure adherence to statutory requirements and thank you for your efforts to power the "Great American Comeback." We look forward to working with you to accomplish this goal. A good start would be to ensure EPA regulations are based on the best available science and science is not abused to punish job creators or to score political points. Thank you for your attention to this important matter.

Sincerely,

Glenn Grothman
Member of Congress

Michael Guest
Member of Congress

Jake Ellzey
Member of Congress

Bruce Westerman
Member of Congress

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[1] https://www.epa.gov/newsreleases/united-states-seeks-preliminary-injunction-against-denka-performance-elastomer

[2] https://iris.epa.gov/document/&deid=361799#:~:text=EPA%20has%20finalized%20the%20IRIS,decisions%20to%20protect%20human%20health.

[3] https://apnews.com/article/environmental-justice-biden-administration-louisiana-court-8094be2392821f50a7f0bbcd892a9a62