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January 21, 2000

Carol M. Browner
Administrator
Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Dear Administrator Browner,

The Children's Health Protection Advisory Committee met on December 8-9, 1999, at which time it took up the issue of research priorities at EPA and looked specifically at the draft "Strategy for Research on Environmental Risks to Children" prepared by the Office of Research and Development. The Committee has had a long-standing interest in the scientific information available to EPA to protect children's health, and the processes used by the Agency to develop, gather, interpret and apply that information. The Committee and its Science Work Group appreciate the briefings provided by ORD at meetings of the Science Work Group both in September and December of this year. The purpose of this letter is to convey the Committee's initial comments on the draft "Strategy for Research on Environmental Risks to Children" (the Strategy).

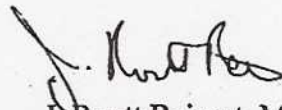
Overall, the Strategy outlines a research agenda that will move research on children's environmental health issues in a positive direction and will result in important, additional information. However, the focus of the Strategy seems firmly oriented toward generating information to support and improve EPA's risk assessment process and to refine the models used in such processes, while placing less emphasis on improving the basic science needed to better understand the unique environmental health issues affecting children. Thus, the research plan does not do enough to answer questions about the relationship of children to hazards in their environment. The Committee strongly urges the Agency to add resources and increase the budget to better fund those basic research needs.

In the Strategy itself the Committee urges EPA to modify the method and explanation of priority setting. First, the Office of Research and Development and its work group set the research priorities based upon the application of [eight] criteria. However, the office provided only the final priority determinations. This does not provide adequate understanding or basis for review of the Office's rationale. Therefore, we strongly encourage EPA to implement the suggestion it received from the external peer review

process conducted in November, and from our Science Work Group, to create a matrix of the criteria and the priorities set against each criterion. Further, we understand that EPA distinguished between high versus medium and low priorities based in part on availability and expertise of internal staff resources. We believe that, while the efficient use of available resources is an important criterion, it may in some cases bias the selection of priorities in an inappropriate and artificial way. In fact, too much emphasis on that criterion may result in a failure to aggressively seek additional resources to conduct or sponsor more critical research. With a complete explanation, priorities can be based more on the importance of the research needs, with allocation of internal and external resources factored into how these priorities are implemented, coupled with the basis for allocation of additional resources.

The Children's Health Protection Advisory Committee remains totally committed to supporting EPA's efforts to better protect the health and safety of children and will continue to develop and offer ways EPA can create a cogent, Agency-wide research program that addresses hazards, exposure and risks to children and which will result in the creation of institutional mechanisms to consider children routinely in EPA research and decision making. Thank you for the opportunity to comment.

Sincerely,



J. Routt Reigart, MD
Chair, Children's Health Protection
Advisory Committee

cc. R. Trovato, P. Goode, W. Farland