

March 21, 2025

Dear Members of Congress,

The undersigned 123 environmental, public health, science, and community organizations, and businesses from across the United States write to urge members of the U.S. Congress to oppose efforts to dismantle and cut the U.S. Environmental Protection Agency's (EPA) Office of Research and Development (ORD), which leads scientific research at EPA. We also urge members to oppose H.R. 1415 and S. 623. These bills would prohibit the EPA from relying on any scientific assessment produced by the Office of Research and Development's Integrated Risk Information System program (IRIS). Supporting these actions would be a vote for more cancer, and a direct attack on children who are most at risk of cancer, birth defects, learning disabilities, and other severe health impacts from toxic exposure early in life.

ORD conducts and provides [scientific research](#) that is essential to EPA's mission of protecting public health and the environment. ORD's [Homeland Security National Research Program](#) informs the nation's response to contamination caused by [natural disasters](#), pathogens that cause communicable diseases, and covert release of chemicals. Congress has tasked ORD with investigating the threat posed by [PFAS contamination](#) and evaluating PFAS remedial technologies.¹ ORD coordinates research across EPA and provides the scientific foundation for much of the agency's work to reduce exposures to chemicals that cause cancer, developmental harm, and other serious risks. ORD also provides vital research on the health and environmental impacts of pollution and climate change. The Trump administration's [reported plan](#) to dissolve ORD and to fire more than 1,000 ORD scientists would harm children's health and make the country overall less healthy and less safe.

IRIS, in particular, provides a critical scientific service to EPA, other federal, state, and local agencies—and the public—by providing expert technical support and developing science-based toxicity evaluations and determinations regarding the link between exposure to specific chemicals and particular health harms. IRIS assessments, combined with exposure information compiled by EPA program offices, provide relevant information for risk assessments performed by EPA, including program office determinations regarding Superfund site cleanup levels, air toxics standards, and drinking water safeguards. These science analyses and the technical support that IRIS program staff provide to EPA's program offices are the foundation of life-saving health protections adopted over decades. If EPA cannot rely on IRIS assessments, the agency will be ill-equipped and far less able to address or clean up toxic chemicals that make people sick and harm quality of life. As a result, more people, including children, will face cancer, birth defects, and other health conditions linked to toxic exposure.

¹ 15 U.S.C. § 8962.

A recent [executive order](#) establishing the “Make America Healthy Again Commission” states: “Across 204 countries and territories, the [U.S.] had the highest age-standardized incidence rate of cancer in 2021, nearly double the next-highest rate,” and “the [U.S.] experienced an 88 percent increase in cancer” between 1990-2021. Yet, dismantling ORD, especially coupled with these bills, would leave EPA unable to rely on the best available science on the preventable causes of cancer, Parkinson’s disease, and other serious health impacts linked with toxic chemical exposure.

Dissolving ORD and passing these bills would cause severe harm in communities facing high cancer risks from exposure to formaldehyde, ethylene oxide, and hundreds of other toxic chemicals assessed by the IRIS program. These assessments provide the scientific basis for essential health protection in these communities—including Geismar, Reserve and Baton Rouge, Louisiana; Houston and Laredo, Texas; Institute, West Virginia; New Castle, Delaware; Louisville, Kentucky; Salinas, Puerto Rico; Lake County, Illinois; and many more—where tens of millions of people face elevated cancer threats from industrial pollution. EPA must continue preventing cancer from air pollution.

IRIS assessments are developed through a robust, standardized, scientific method that includes transparent sharing of information, public comment, and independent peer review. For this reason, for over three decades, EPA has determined that IRIS is the preferred source of information for identifying and assessing toxicity and determining dose-response values for cancer and other chronic diseases. Independent governmental experts, including the Government Accountability Office, have also recognized the integrity and importance of IRIS.² The National Academies of Sciences (NAS) has repeatedly reaffirmed the use of IRIS values, despite polluter efforts to undermine IRIS.³

Directing EPA not to consider or use IRIS values would conflict with core principles of [scientific integrity](#) and administrative law. There is no other unified governmental source of the health information that IRIS provides. Undermining IRIS would be inefficient, requiring multiple offices to devote resources to toxicological assessment of the same pollutants. IRIS scientists work independently from policy and program offices to assess and provide information on the best available science on health impacts of toxic chemicals. There can be no dispute that the best available science should be used to protect clean air, land, water, and children’s health. It is essential that IRIS be allowed to [continue](#) “develop[ing] impartial toxicity information.”

Industry groups that oppose the health-protective safeguards that are based on IRIS assessments have mischaracterized the challenges faced by IRIS, which simply show IRIS needs more resources.⁴ Congress should reject all attempts to sideline or undermine the IRIS program and downplay the health harms of toxic chemicals. Denying established science is never the answer.

² See, e.g. <https://www.gao.gov/assets/gao-21-156.pdf> (calling IRIS assessments “the gold standard for toxicity values” because “the IRIS process is so rigorous”).

³ See also <https://nap.nationalacademies.org/catalog/26289/review-of-us-epas-ord-staff-handbook-for-developing-iris-assessments> (calling IRIS methods “a model”).

⁴ [GAO-25-107743, HIGH-RISK SERIES: Heightened Attention to High-Risk Areas Could Yield Billions in Savings and A More Efficient and Effective Government](#) (“Since resources have remained static, the IRIS Program has been unable to increase the number of assessments in development at any one time despite high demand.”).

We urge you to oppose these bills and all efforts to dissolve, dismantle, or weaken the EPA Office of Research and Development and IRIS program whether through budget cuts or reductions in force that ignore the core health and safety mission of EPA and the necessity of ORD to fulfill EPA's responsibilities under law. Your constituents look to you to protect their air, water, and land, and to safeguard their health – please ensure that their interests remain paramount. Oppose these attacks to show you support children's health and you stand with families nationwide who are affected by cancer, birth defects, and other serious health conditions linked to chemical exposure.

Sincerely,

7th Generation Advisors
Air Alliance Houston
Alaska Community Action on Toxics
Aligned for Impact
Alliance of Nurses for Healthy Environments
BASEstud.io
Bend the Curve
Between the Waters
Beyond Pesticides
Beyond Plastics
Blue Ridge Environmental Defense League
Boundless Community Action
Break the Cycle of Health Disparities, Inc
Breast Cancer Prevention Partners
Buxmont Coalition for Safer Water
California Communities Against Toxics
Catskill Mountainkeeper
Center for Environmental Health
Center for Food Safety
Center for Progressive Reform
Cherokee Concerned Citizens
Children's Environmental Health Network
Clean Air Action Network of Glens Falls (NY)
Clean Cape Fear
Clean Power Lake County
Clean Water Action
Clean+Healthy
Climate Conversation Brazoria County
Coal Kills Baltimore
Coming Clean

Community Alliance for Global Justice
Contra Costa MoveOn
Defend Our Health
Doctors Organized for Health Care Solutions
Don't Waste Arizona
Don't Waste New York
Earthjustice
EcoMadres
ECOS
Environmental & Public Health Consulting
Environmental Defense Fund
Environmental Hope and Repair Lake County
Environmental Integrity Project
Environmental Justice Health Alliance for Chemical Policy Reform (EJHA)
Environmental Justice Task Force Tucson
Environmental Protection Network
Environmental Working Group
Erda Environmental Services, Inc
Family Bridges
Family Farm Defenders
Friends of the Earth
Greater Boston Physicians for Social Responsibility
Green Science Policy Institute
GreenLatinos
Greenpeace USA
Habitable
Health Care for All - Contra Costa County
Healthy Babies Bright Futures
Healthy Gulf
Informed Green Solutions Inc
Jacobs Institute of Women's Health
Just Zero
Lafayette Community Garden and Outdoor Learning Center
Lafayette Peace & Justice Group
Lamorinda Peace and Justice Group
League of Conservation Voters
Los Jardines Institute
Louisiana Environmental Action Network
Maryland Pesticide Education Network
Merrimack Citizens for Clean Water

Micah 6:8 Mission
Moms Clean Air Force
Moms for a Nontoxic New York (MNNY)
NAACP
National Association of Pediatric Nurse Practitioners
National Federation of Federal Employees (NFFE-IAM)
National PFAS Contamination Coalition
National Wildlife Federation
Natural Resources Defense Council
New Jersey Sustainable Business Council
New Mexico Environmental Law Center
Newburgh Clean Water Project
No Boundaries Coalition, Inc.
Northeast Ohio Black Health Coalition
Oregon Physicians for Social Responsibility
Our Zero Waste Future
Peak Plastic Foundation
People Concerned About Chemical Safety
Pesticide Action & Agroecology Network
PfoaProject NY
Physicians for Social Responsibility
Physicians for Social Responsibility - Colorado
Physicians for Social Responsibility Arizona Chapter
Physicians for Social Responsibility Pennsylvania
Physicians for Social Responsibility, Maine
Physicians for Social Responsibility, Texas
Potomac Riverkeeper Network
Project TENDR
Public Citizen
Quassaick Creek Watershed Alliance
RiSE for Environmental Justice
Rise St. James
S.O.H2O Save Our Water
San Francisco Bay Physicians for Social Responsibility
Society of Native Nations
South Carolina Indian Affairs Commission, Idle No More SC
Testing for Pease
Texas Environmental Justice Advocacy Services (t.e.j.a.s.)
The National Association of Nurse Practitioners in Women's Health (NPWH)
Third Act Maine

Toxic Free North Carolina
Turtle Island Restoration Network
Union of Concerned Scientists
Until Justice Data Partners
USC Credit Union
Utah Physicians for a Healthy Environment
Washington Conservation Action
Waste for Life
WBESC
WERA Co-Founders, Mebane, NC
West End Revitalization Association - WERA
Western Broome Environmental Stakeholders Coalition (WBESC)
WPSR

cc:

The Honorable John Thune
Senate Majority Leader
U.S. Senate
Washington, D.C. 20510

The Honorable Chuck Schumer
Senate Minority Leader
U.S. Senate
Washington, D.C. 20510

The Honorable Mike Johnson
Speaker
U.S. House of Representatives
Washington, DC 20515

The Honorable Hakeem Jeffries
House Minority Leader
U.S. House of Representatives
Washington, D.C. 20515