

Attachment H

Comments on Draft Guiding Principles

Public health is the first and foremost consideration. Development and maintenance of the CCL should, to the extent possible, maximize improvements to public health.

A member asked for clarification of the phrase “maximize improvements to public health.” He commented that it is a good goal but questioned how to achieve it.

The classification approach should err on the side of protecting public health. Inclusive rather than exclusive; fully protective to sensitive subpopulations.

- A member commented that the principle should not mean having a lot of false positives, which overburdens the system and therefore does not promote public health.
- A member commented that the phrase “fully protective” raises a question of risk that cannot be addressed by this process. He suggested alternative wording of “full consideration.” Another member commented that being fully protective of sensitive subpopulations would be a colossal task.
- A member commented that “inclusive rather than exclusive” needs clarification. Another member observed that different philosophies may apply to different parts of the process.

The classification approach should provide rationale for why a contaminant is on or off list and should explain whether the decision was based on expert judgment, science, policy considerations, or other considerations.

A member asked at what point in the process rationale should be provided (i.e., for contaminants not included in the universe, the PCCL, or the CCL). He commented that to have full disclosure of why something is not on the list is an intensive requirement. A member suggested alternative wording: “rationale for the process.” Another member commented that providing rationale for why something is not included on the list need not be very onerous. It could be as basic as explaining that certain databases were examined and nothing was found in them. The member explained that a goal of providing rationale is to help make the process understandable.

The classification approach should apply equal rigor to chemical and microbial contaminants from a public health perspective.

A member commented that the work group should consider the implications of having to apply equal rigor to chemical and microbial contaminants.

The CCL decision-making process must be open, accessible, and understandable to all stakeholders, including the interested and informed general public as well as the professional and scientific community and all directly affected parties

A member suggested shortening this two-sentence principle to a single sentence: the CCL decision-making process must be open, accessible, and understandable to all stakeholders.

The opportunity for substantive public involvement throughout the entire process is essential to the credibility of all decisions

A member commented that EPA should not have to duplicate this work group as it implements the actual CCL listing process.