

OECD - HAZARD ASSESSMENT FOR MOCA

By: Donald P. Gallo, Esq.

On September 11, 2013 two member supplier companies were alerted that an international hazard assessment for MOCA by the Organization for Economic and Cooperative Development (OECD) was scheduled to be conducted on October 15-17 at the American Chemical Council's ("ACC's") offices in Washington, DC. By way of background, when the High Production Volume (HPV) Challenge Program was launched by USEPA U.S. companies that sponsored a HPV chemical had the option of compiling the screening initial data set (SIDS) hazard information on the chemical and submitting it to EPA or through the International Council of Chemical Associations (ICCA) for submission to the OECD for assessment. At the OECD, ordinarily industry would work with a sponsor country to develop the SIDS dossier and submit it for discussion among the member countries. In recent years, the OECD program began to permit industry to present cases without a sponsor country (called direct submissions) in order to try to speed up the submission process. The meeting where this occurs used to be called the SIAM (SIDS Initial Assessment Meeting) but is now called the Cooperative Chemical Assessment Meeting (CoCAM). The meeting culminates in agreed upon language for the final dossier as the agreed upon hazard assessment for the chemical OECD CoCAM. These assessments are later published by the OECD and the United Nations Environment Programme. ACC is a party to the CoCAM meeting as the United States Chemical Industry representative to the Business Industry and Advocacy Counsel (BIAC). PMA's legal counsel met with ACC in WDC on September 18, 2013 to discuss PMA's participation in the upcoming hazard assessment for MOCA. We immediately reviewed the draft materials and submitted multiple documents, studies and reports on MOCA health affects for inclusion in the CoCAM-5 hearing and for consideration in the development of the SIDS. This initial assessment was prepared by the Japanese government consistent with the USEPA HPV dossier.

At the CoCAM-5 meeting in Washington D.C., MOCA was sponsored by the Japanese government. The Japanese prepared the initial submission and member countries commented on the submission during the SIDS Initial Assessment MOCA hearing on October 15, 2013. Japan's representatives prepared a response to the member countries' comments which were discussed during the MOCA hearing on October 15, 2013. PMA's legal counsel, Donald P. Gallo, attended the CoCAM-5 as did Tim Fortune of Omni Specialty and Tatsuro Yokoyama of Ihera American/K-I Chemical U.S.A., Inc. We conducted a meeting with the Japanese delegation prior to the hearing and negotiated some alternative language regarding the exposure to MOCA from finished product articles with the Danish representatives during the hearing. During the assessment hearing, many countries commented on the proposed hazard assessment and the Japanese representatives were directed to complete the hazard assessment within the next 6 months when the OECD will meet again to approve the final version.

We were very fortunate that the OECD meeting was held in the U.S.A. for the MOCA hazard assessment as the OECD has not conducted a hazard assessment meeting in the USA in fifteen years. The final language of the MOCA hazard assessment will be negotiated between the Japanese government representatives, the Danish government representative and the PMA..