

November 25, 2024

On behalf of the Endocrine Society, thank you for the opportunity to comment on the development of an “enhanced systematic process for the FDA’s postmarket assessment of chemicals in food.” The Endocrine Society is the world’s oldest, largest, and most active organization devoted to research on hormones and the clinical practice of endocrinology. Our membership consists of over 18,000 scientists, physicians, educators, nurses, and students in more than 100 countries. We represent all basic, applied, and clinical interests in endocrinology, including many of world’s leading experts on the health effects of endocrine-disrupting chemicals (EDCs) many of which may be found in food, or in food contact materials.

We welcome the development of a robust, systematic process for post-market assessment of chemicals in food. Such assessments are desperately needed, as exposure to EDCs often used in food contact materials, including bisphenols and phthalates, is widespread, often with cumulative and mixture effects. However, the long-term success of this process will depend on how effective the FDA is at efficiently identifying and acting on harmful chemicals in an efficient and transparent manner. Towards this goal, we recommend that the FDA:

- Engage independent, academic scientists in peer review of assessments, especially endocrine scientists for chemicals that may have effects on the endocrine system.
- Establish a separate office of reassessments so that risk assessments are conducted by individuals who have not been involved in the approvals process.
- Ensure that assessments are conducted by individuals with appropriate technical expertise, and with open public comment periods to bring in perspectives of external scientists and others.
- Establish processes to use read across and other methods to take action on groups of chemicals that have similar effects to avoid regrettable substitutions.

We urge the FDA to provide more details about the process that the FDA will use to review priority chemicals, and we encourage the FDA to consider health impacts and prioritize EDCs due to their well-established links to diseases and effects on critical developmental processes. Our members stand ready to assist the FDA in the development and implementation of this process; thank you again for your time and consideration of our comments.

Sincerely,



John Newell-Price, M.D., Ph.D., F.R.C.P.,  
President, Endocrine Society