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INDEPENDENT • NON-PROFIT • SCIENCE
FOR PUBLIC HEALTH PROTECTION

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Last week the Center for Progressive Reform released a position paper that defames the goals and intentions of the independent science-based organization Toxicology Excellence for Risk Assessment (TERA). The paper, titled "How the Manufacturers of Toxic Chemicals Seek to Co-opt Their Regulators," wrongly asserts that because TERA receives some financial support from various industrial firms (about a third of its budget), that its activities and results are therefore biased to be favorable to industry. Their conclusions about TERA do not follow from the information readily available and, their article is mistaken or omits relevant information about TERA *in every instance*.

TERA believes that the best science is achieved by collaboration among experts and by bringing all data and ideas to the table in an open forum. This commitment requires participation and open discussion with scientists from all sectors, including government, industry, academia, and NGOs. Excluding scientists from certain sectors from participation is counterproductive, because important data and ideas will be missing from the discussions. TERA has conducted collaborative projects and independent reviews in an open process since 1995, inviting all interested parties to observe the discussions and provide technical comments. Detailed summaries of peer review meetings are made public on its web page so that interested parties can gain a clear picture of the nature of the significant breadth and depth of the scientific discussions.

TERA is an independent, public, scientific, 501(c)(3) organization with a mission to protect public health. It does not advocate. It carefully conducts its work to maintain scientific independence and broadly and freely shares the results of its independent research and development through its website, public comments to government agencies requesting assistance, and through peer-reviewed publications. TERA also conducts other kinds of business, including independent scientific research, assessment of toxicological study results, and maintenance of an on-line compendium of risk evaluations. This work is paid for by a wide variety of organizations, including U.S. and international federal and state agencies, other not-for-profit entities, and industrial firms, and through TERA's extensive pro bono activities. TERA carefully conducts each project to insure that the conclusions are based upon an objective evaluation of the data and are not influenced by the interests of the sponsors. A summary of funding for its work is (and has always been) posted at <http://www.tera.org/about/FundingSources.html>.

TERA's core principles and values of honesty, integrity, independence, transparency, and collaboration (http://www.tera.org/about/mission_history.html) necessitate an objective approach. Furthermore, it adheres to the strictest conflict-

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of-interest policy (<http://www.tera.org/Peer/PeerProcess.html>) when managing peer reviews for a variety of organizations. TERA acts without regard to sponsor or stakeholder interests and recruits scientists from all sectors (<http://www.tera.org/Peer/MeetingReports/index.html>). TERA's peer-review and conflict-of-interest processes have received high marks from the U.S. Environmental Protection Agency (EPA).¹

TERA's website highlights our collaborative practices and programs that encourage full participation by all interested parties in an open process. CPR's report is uninformed, incorrect and misguided. We regret that CPR did not choose to learn more about TERA before impugning its work as they did.

Sincerely,



Michael L. Dourson, Ph.D., DABT, ATS
President

Toxicology Excellence for Risk Assessment
Awarded the Independent Charities Seal of Excellence--

--Independent Charities Seal of Excellence is awarded to the members of Independent Charities of America and Local Independent Charities of America that have, upon rigorous independent review, been able to certify, document, and demonstrate on an annual basis that they meet the highest standards of public accountability, program effectiveness, and cost effectiveness. These standards include those required by the US Government for inclusion in the Combined Federal Campaign, probably the most exclusive fund drive in the world. Of the 1,000,000 charities operating in the United States today, it is estimated that fewer than 50,000, or 5 percent, meet or exceed these standards, and, of those, fewer than 2,000 have been awarded this Seal.

¹ EPA, 2009. EPA Can Improve Its Process for Establishing Peer Review Panels. Office of Inspector General. Report No. 09-P-0147. April 29. Pages 5 and page 6 and Appendix table (page 12).