

**Submission by the Endocrine Society to regulations.gov regarding the Pesticide Registration Review: Dimethyl Tetrachloroterephthalate; Draft Occupational and Residential Risk Assessment (Docket EPA-HQ-OPP-2011-0374)**

June 28, 2023

The Endocrine Society appreciates the opportunity to comment on the Pesticide Registration Review of dimethyl tetrachloroterephthalate (DCPA). Founded in 1916, the Endocrine Society is the world's oldest, largest, and most active organization dedicated to the understanding of the endocrine system; what hormones are, what they do, and how they work. Our community of researchers and clinicians are advancing our understanding of how chemicals interfere with endocrine systems and act as endocrine disrupting chemicals (EDCs). We are extremely concerned about the results of the DCPA thyroid toxicity studies, which showed decreased levels of T3 and T4 in fetal rats at very low, biologically-relevant levels, indicating that this chemical is an EDC.

As described in our Position Statement on EDCs<sup>1</sup>, the Endocrine Society maintains that:

- regulations should be designed to protect the most vulnerable populations, including pregnant women, the developing fetus, and other sensitive populations;
- there exists the potential for non-monotonic dose responses and the possibility of no safe level of exposure for EDCs such as DCPA; and
- a precautionary approach is necessary when considering the possibility of long-term effects, including neurodevelopmental harms and other adverse effects resulting from alterations in thyroid hormone levels during development.

Furthermore, we note that effects of phthalates on thyroid hormone levels in the developing fetus have been repeatedly observed in the scientific literature<sup>23</sup>, underscoring the severe hazards that exist for this class of chemicals.

Consistent with our established positions and based on the demonstrated hazards for DCPA and other phthalates, we do not believe that there are feasible mitigation measures that can address the adverse effects of DCPA exposure. We therefore believe that restriction measures are necessary, including cancelling the registration of all products containing DCPA.

---

<sup>1</sup> <https://www.endocrine.org/advocacy/position-statements/endocrine-disrupting-chemicals>

<sup>2</sup> Villanger et al., *Environ Int.* 2020 Apr;137:105509. doi: 10.1016/j.envint.2020.105509. Epub 2020 Feb 7. <https://pubmed.ncbi.nlm.nih.gov/32044443/>

<sup>3</sup> Derakhshan et al., *Environ Int.* 2021 Dec;157:106795. doi: 10.1016/j.envint.2021.106795. Epub 2021 Aug 4. <https://pubmed.ncbi.nlm.nih.gov/34358912/>