

April 11, 2023

The Honorable Mike Simpson
Chair
House Appropriations Committee
Subcommittee on Interior, Environment,
and Related Agencies
Washington, D.C. 20515

The Honorable Chellie Pingree
Ranking Member
House Appropriations Committee
Subcommittee on Interior, Environment,
and Related Agencies
Washington, D.C. 20515

Dear Chair Simpson and Ranking Member Pingree:

On behalf of the nation's recreational fishing and boating community, we write in support of including language in the Fiscal Year 2024 (FY24) Interior, Environment and Related Agencies appropriations bill report to support the development of chemical alternatives to 6PPD, an antidegradant universally used to improve tire durability.

As you may be aware, in 2020, a research team at the University of Washington, Washington State University, and the Washington Stormwater Center identified 6PPD-quinone as inducing rapid mortality in coho salmon. This and subsequent studies have indicated that when tire wear particles containing 6PPD runoff into waterways, low concentrations of 6PPD-quinone may impact certain types of freshwater and anadromous fish including coho salmon, chinook salmon, brook trout, and rainbow trout.

We recognize and appreciate that the U.S. tire manufacturing and chemical additive industries are committed to developing and evaluating 6PPD alternatives. Recognizing the high importance of both tire safety and fisheries health, it is in our collective best interest that viable 6PPD alternatives be identified and approved as quickly as possible. From research and development, testing, production, and gradual replacement of tires, it could take decades to fully replace 6PPD on new tires. To help expedite this timeframe and avoid unnecessary delays, we encourage the committee to include the following language in the FY24 Interior, Environment and Related Agencies appropriations report:

The Committee is aware that for over 50 years U.S. tire manufacturers, vehicle safety regulators, and consumers have relied on 6PPD as a highly effective antidegradant additive in tires. 6PPD prevents tire rubber cracking and deterioration ensuring tire performance, durability and safety standards are achieved for the life of the tire. Without 6PPD, tires are prone to catastrophic failure, weakened performance and safety, and shorter lifespans. Because of the high performance of 6PPD in ensuring tire safety and longevity, very little federal, academic, and industrial research, testing, or evaluation of alternatives has occurred to date.

The Committee is also aware of recent environmental research indicating that when 6PPD is exposed to oxygen or ozone it transforms to create 6PPD-quinone which, these studies indicate, has negative impacts on fish in the aquatic environment, particularly coho salmon. While the Committee is encouraged by emerging approaches to reduce any

potential impacts of 6PPD-quinone, such as stormwater treatment techniques using retention ponds to address runoff from highways, the Committee also recognizes the immediate need to research and develop viable alternatives without compromising vehicle safety and tire performance. The Committee also understands the significant challenge for private industry in developing alternative chemical formulations that have no environmental risks, testing those new molecules, and obtaining regulatory approvals. Therefore, the Committee directs the Office of Research and Development Center for Computational Toxicology and Exposure to form partnerships with domestic 6PPD manufacturers and domestic tire manufacturers to investigate environmentally friendly alternatives and develop testing approaches to expeditiously evaluate these alternatives and their derivatives, including ecotoxicity. In developing potential chemical alternatives to 6PPD, the Center for Computational Toxicology and Exposure shall coordinate and work with experts in rubber chemistry and an understanding of antidegradant and antiozonant properties. The Committee requests the EPA to provide a briefing within 60 days on their plans to coordinate with external experts to advance alternatives for 6PPD and requests a progress report on these plans in 180 days.

Thank you for your consideration, and for all that you and the committee do to support the nation's fisheries resources.

Sincerely,

American Sportfishing Association
Backcountry Hunters & Anglers
Coastal Conservation Association Washington
Congressional Sportsmen's Foundation
Golden State Salmon Association
Guy Harvey Foundation
International Game Fish Association
Major League Fishing
National Professional Anglers Association
Northwest Sportfishing Industry Association
Wild Oceans