



December 15, 2023

Gabriela Rossner
Existing Chemicals Risk Management Division
Office of Pollution Prevention and Toxics
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

Re: Docket No. EPA-HQ-OPPT-2020-0465 — Trichloroethylene (TCE); Regulation Under the Toxic Substances Control Act (TSCA)

Dear Ms. Rossner:

Parkinson's disease is the second most common neurodegenerative disease, and the incidence of the disease is growing at a faster rate than would be predicted based on the increase in the aged population alone (1). In addition to the well-known motor symptoms of the disease, those affected experience numerous other symptoms including depression, pain, sleep disturbances and cognitive issues (2). Patients have reported that living with Parkinson's can create a ripple effect in their lives, as well as for their families, friends and caregivers. As symptoms worsen, patients must often leave their jobs, and in the later stages of the disease patients require great amounts of specialized care. The economic burden of Parkinson's disease is estimated to be over \$52 billion annually in the United States alone and is projected to reach nearly \$80 billion per year by 2037 (3).

Trichloroethylene (TCE) has been linked to the development of Parkinson's disease in several human studies (4, 5, 6, 7). Further studies utilizing several different experimental approaches in laboratory animals have confirmed that TCE exposure through ingestion or inhalation can trigger pathological pathways known to be involved in Parkinson's disease and kill the dopamine-producing neurons lost in the disease (4, 8, 9, 10, 11, 12). This phenomenon deserves further study, but there is now evidence at multiple levels linking exposure to TCE to Parkinson's disease.

Despite decades of work and billions of dollars of investment, there are still no approved treatments available that can stop or reverse the pathology of Parkinson's disease once it has begun. Once Parkinson's disease patients are officially diagnosed with the disease, it is estimated they may have already lost up to 50 to 70 percent of the dopamine producing cells in their brain (2). While dozens of promising treatments are currently in development to slow the progression of the disease, viable approaches to fully repair this damage are extremely challenging to conceive and develop. That's why regulations and policies that limit human exposure to substances known to increase the risk of Parkinson's disease are a crucial tool in preventing as many Parkinson's disease cases as possible. On behalf of the Parkinson's community, we at The Michael J. Fox Foundation for Parkinson's Research are

extremely pleased with the EPA's proposal to ban most uses of TCE within one year. We strongly support this rule and encourage the EPA to keep it as strict as possible.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Thompson". The signature is fluid and cursive, with the first name "Ted" being more prominent than the last name "Thompson".

Ted Thompson

Senior Vice President of Public Policy

The Michael J. Fox Foundation for Parkinson's Research

References

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