

I. MATERIALS SUBCOMMITTEE

PROPOSAL:

PROCESS FOR LIMITED SCOPE TECHNICAL REVIEWS

We support the proposal to establish a process for *limited scope* Technical Reviews (TRs). We support this proposal as a way to save time and resources in cases where certain threshold criteria are not met, and a full TR would not be warranted.

However, we believe it is important to specify that the limited scope TR would only be used as an interim step, and that no material could ever be added to the National List unless a full TR has been conducted. It should be specified that the interim TR could only lead to a rejection of the material by the full board or a decision by the subcommittee to move a petition forward by subsequently requesting a full TR before the material is brought to the full Board.

In essence, the purpose for a limited edition TR would be to facilitate a go/no-go interim decision.

Under no circumstances should a material be added to the National List when only a limited scope TR has been performed. While we believe this is the intent of the proposal, we suggest making this very clear in the proposed language to circumvent potential future abuse.

In fairness to petitioners, we also suggest that the responsibility for rejecting a material, based on a limited scope TR, still lies with the full Board, rather than the subcommittee.