

55 Public health, medical, academic, and scientific groups oppose EPA transparency rule

May 18, 2020

Our organizations strongly oppose EPA's supplemental notice of proposed rulemaking (SNPRM) to the "Strengthening Transparency in Regulatory Science" proposed rulemaking. Like the original proposed rule, this supplemental proposal would undermine sound science and put Americans' health and the environment at risk. We are deeply concerned with EPA's continued efforts to impede the use of critical science and implore the agency to withdraw the proposal.

If EPA excludes studies or diminishes the consideration of studies because the data cannot be made public, people may be exposed to real harm. The result would be decisions affecting millions based on inadequate information that fails to include well-supported studies by expert scientists.

More troubling, the supplemental proposal goes further than EPA's original proposal by dramatically expanding the scope of the rulemaking. By including "influential scientific information" in addition to significant regulatory actions, EPA's ability to use the best science available is further restricted.

We support improving the transparency of science and access to data. When feasible, scientists should strive for appropriate public access to data to maximize independent validation and trust in the scientific process. However, there are many credible scientific studies where the exposure of raw data to the public is infeasible or would reveal confidential patient information.

The research EPA relies on to make determinations is already transparent in most cases. Many scientific journals and research agencies now have policies governing the sharing of data among researchers and with appropriate access by the public at large.

EPA's efforts with the supplemental proposal are misguided and will not improve the quality of science used by EPA nor allow the agency to fulfill its mandate of protecting human health and the environment. For the sake of the country's health, EPA must not restrict this research.

Due to the urgency and importance of this matter, we urge the EPA to withdraw the "Strengthening Transparency in Regulatory Science" Proposed Rulemaking.

Signed,

Allergy & Asthma Network

Alliance of Nurses for Healthy Environments

American Academy of Pediatrics

American Academy of Physical Medicine & Rehabilitation

American Association for the Advancement of Science

American College of Lifestyle Medicine

American College of Obstetricians and Gynecologists

American College of Physicians

American College of Physicians California Services Chapter

American Heart Association

American Institute of Biological Sciences

American Lung Association

American Medical Association

American Public Health Association

American Thoracic Society

Association of Schools and Programs of Public Health

Asthma and Allergy Foundation of America

Asthma and Allergy Foundation of America - Michigan Chapter

Breast Cancer Prevention Partners

California Thoracic Society

Center for Climate Change and Health

Central Virginia Asthma Coalition

Children's Environmental Health Network

Endocrine Society

Fresno Madera Medical Society

Geological Society of America

George Mason University Center for Climate Change Communication

Health Care Without Harm

International Society for Environmental Epidemiology - North American Chapter

MI Air MI Health

Montana Health Professionals for a Healthy Climate

Mothers & Others for Clean Air

National Association of County and City Health Officials

National Association of Pediatric Nurse Practitioners

National Center for Health Research

National Environmental Health Association

National WIC Association

Ninjas for Health

Physicians for Social Responsibility

Physicians for Social Responsibility – Arizona Chapter

Physicians for Social Responsibility - Colorado Chapter

Physicians for Social Responsibility – Greater Boston Chapter

Physicians for Social Responsibility – Iowa Chapter

Physicians for Social Responsibility – Oregon Chapter

Physicians for Social Responsibility – San Francisco Bay Area Chapter

Physicians for Social Responsibility – Tennessee Chapter

Public Health Institute

Sheboygan Ozone Reduction Alliance (SORA)

Tennessee Chapter of the American Academy of Pediatrics

The Michael J. Fox Foundation for Parkinson's Research

The Society of General Internal Medicine

Union of Concerned Scientists

Virginia Chapter, American Academy of Pediatrics

Virginia Clinicians for Climate Action

Washington Thoracic Society