

November 13, 2019

United States House of Representatives  
Committee on Science, Space and Technology  
The Honorable Eddie Bernice Johnson, Chairwoman  
The Honorable Frank Lucas, Ranking Member  
Washington, DC 20515

Dear Chairwoman Johnson and Ranking Member Lucas:

Thank you for taking the time to hold today's hearing on the U.S. Environmental Protection Agency's (EPA) "Strengthening Transparency in Regulatory Science" proposed rule. As 62 public health, medical, academic, and scientific groups representing millions of Americans, we write to reiterate our ongoing concern over the rule. We hope this oversight hearing will shed further light on the rule's detrimental impacts on EPA's policymaking abilities.

We strongly oppose EPA's efforts to restrict the use of the best available science in its policymaking. Please request that EPA ensure research is protected, and ensure this rule does not move forward.

We support the goal of improving the transparency of science and access to data. When feasible, scientists should strive for appropriate public access to data to maximize utility 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 or research participant information. The National Academy of Sciences has long opposed such action, stating "[s]ince unrestricted access can cause harm to individuals and also conflicts directly with respect for individual autonomy, it is not an appropriate policy."<sup>1</sup>

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. This would also put EPA at odds with the approaches in place at the Centers for Disease Control and Prevention, the National Institutes of Health, and the Food and Drug Administration.

If EPA excludes 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. These efforts 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.

Sincerely:

Allergy & Asthma Network

Alliance for Aging Research

American Academy of Pediatrics

American Autoimmune Related Diseases Association

American Brain Coalition

American College of Physicians

American Geophysical Union

American Geriatrics Society

American Heart Association

American Institute of Biological Sciences

American Lung Association

American Parkinson Disease Association

American Physiological Society

American Public Health Association

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| American Society for Investigative Pathology              | Medical Society Consortium on Climate and Health         |
| American Sociological Association                         | National Association of County and City Health Officials |
| American Thoracic Society                                 | National Center for Environmental Health Strategies      |
| Association of American Universities                      | National Eczema Association                              |
| Association of Public Health Laboratories                 | National Multiple Sclerosis Society                      |
| Association of Schools and Programs of Public Health      | Parkinson's Foundation                                   |
| Asthma and Allergy Foundation of America                  | Physicians for Social Responsibility                     |
| Autism Speaks   | Princeton University                                     |
| Big Cities Health Coalition                               | Society for the Study of Evolution                       |
| Bridge the Gap - SYNGAP Education and Research Foundation | Society for the Study of Reproduction                    |
| Center for Open Science                                   | Society of Toxicology                                    |
| Center for Reproductive Rights                            | Stony Brook University                                   |
| Children's Environmental Health Network                   | The Association of Public and Land-Grant Universities    |
| Cornell University  | The Michael J. Fox Foundation for Parkinson's Research   |
| Council on Governmental Relations                         | Union of Concerned Scientists                            |
| Endocrine Society   | The University of California System                      |
| Geological Society of America                             | University of California, Berkeley                       |
| Harvard University  | University of California, Los Angeles                    |
| Health Care Without Harm                                  | University of California, Merced                         |
| Healthy Schools Network                                   | University of California, Riverside                      |
| Huntington Breast Cancer Action Coalition, Inc.           | University of California, San Francisco                  |
| International Essential Tremor Foundation                 | University of California, Santa Cruz                     |
| International Society for Environmental Epidemiology      | University of Florida                                    |
| Medical Advocates for Healthy Air                         | University of Washington                                 |

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<sup>1</sup> National Research Council. 2000. *Improving Access to and Confidentiality of Research Data: Report of a Workshop*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/9958>