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.”

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