

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."¹

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

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

¹ 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>