



Ecological Society of America
1990 M St, NW, Suite 700
Washington, DC 20036

January 10, 2020

Dr. Michael Honeycutt, Chair, EPA Science Advisory Board
C/O Dr. Thomas Armitage
Designated Federal Officer, Science Advisory Board
U.S. Environmental Protection Agency
E: armitage.thomas@epa.gov

Re: SAB Consideration of the Scientific and Technical Basis of EPA's Proposed Rule Titled *Strengthening Transparency in Regulatory Science*

Dear Dr. Honeycutt and Science Advisory Board Members:

The Ecological Society of America (ESA) is a professional scientific society composed of over 9,000 professional ecologists. ESA thanks you for the opportunity to submit comments for the U.S. Environmental Protection Agency Science Advisory Board (EPA SAB) meetings scheduled for January 17, 21, 22, and 24. ESA strongly opposes the EPA's proposed rule, "Strengthening Transparency in Regulatory Science." We appreciate the SAB members' review of this proposed rule and share its concerns outlined in the SAB Draft Report issued Oct. 19, 2019.

The proposed rule stipulates that the EPA will ensure that the data and models underlying the pivotal science that informs significant regulatory actions are made publicly available and that they are available in a format that allows for outside analysis and validation. Within the scientific community, high-quality scientific studies are judged by scientific methodology and the rigor with which they are conducted during the peer review process, and not solely on data transparency. While the ESA generally supports open science and transparency, the ESA is concerned that overly stringent requirements for transparency may cause valid scientific evidence to be discarded and thereby pose a threat to the credibility of regulatory science and the EPA's ability to use the best available science in decision-making. As a result, this proposed rule could have far-reaching consequences for clean air, clean water, public health and the environment. The proposed rule also ignores the inherent risks involved in data disclosure such as the need to protect confidential human subject data used in epidemiologic studies.

The proposed rule will not improve the quality of science used by the EPA or allow the agency to fulfill its mandate of protecting human health and the environment. The ESA strongly opposes the EPA's efforts to restrict the use of the best available science in its policymaking and encourages the EPA to withdraw its proposal.

The Society stands ready to work with the EPA and the SAB with other members of the scientific community to evaluate the unintended consequences of this proposed rule. Thank you for your consideration of our concerns.

Sincerely,
Ecological Society of America