



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

October 1, 2018

The Honorable John Barrasso
Chairman
Committee on Environment and Public Works
410 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Thomas R. Carper
Ranking Member
Committee on Environment and Public Works
456 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Mike Rounds
Chairman
Subcommittee on Waste Management
and Regulatory Oversight
410 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Cory Booker
Ranking Member
Subcommittee on Waste Management
and Regulatory Oversight
456 Dirksen Senate Office Building
Washington, DC 20510

Re: Oversight of the Environmental Protection Agency's Implementation of Sound and Transparent Science in Regulation

Dear Senators Barrasso, Rounds, Carper, and Booker:

The Ecological Society of America (ESA) is a professional scientific society composed of over 9,000 professional ecologists. I write on its behalf to express ESA's strong opposition to the Environmental Protection Agency's Notice of Proposed Rulemaking, "Strengthening Transparency in Regulatory Science."

The proposed rule stipulates that the U.S. Environmental Protection Agency (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, the 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. The Society stands ready to work with Members of Congress, the EPA and other members of the scientific community to evaluate the unintended consequences of this proposed rule. Thank you for providing oversight on this issue and for your consideration of our concerns.

Sincerely,
Laura Huenneke, Ph.D
President