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EPA Response to Sierra Club Letter to the Office of Inspector General

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The U.S. Environmental Protection Agency (EPA) has responded to a letter from Sierra Club dated March 14, 2017, to the Office of Inspector General. In its letter, Sierra Club requested an inquiry into public statements regarding climate change made by Administrator Pruitt and said that his statements violated the EPA Scientific Integrity Policy. The EPA response stated that the Administrator did not violate the Policy.

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Communications POC: Carolyn Hubbard, ORD Communications Director

Background:

EPA's Scientific Integrity Policy, which was issued in February 2012, provides a framework to ensure scientific integrity throughout EPA and to promote scientific and ethical standards, communications with the public, the use of peer review and advisory committees, and professional development.

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To assist in the review of this allegation, the Scientific Integrity Official convened a panel of Deputy Scientific Integrity Officials from across the Agency. The panel's analysis concluded that the Scientific Integrity Policy applies to all EPA employees, contractors, grantees, collaborators and student volunteers, including political appointees. In addition, the Scientific Integrity Policy explicitly protects differing opinions, stating that:

> *When an Agency employee substantively engaged in the science informing an Agency policy decision disagrees with the scientific data, scientific interpretations, or scientific conclusions that will be relied upon for said Agency decision, the employee is encouraged to express that opinion…*[1]

The freedom to express one's opinion on the science is fundamental to EPA's Scientific Integrity Policy even (and especially) when that point of view might be controversial. This protection is afforded to any employee "substantively engaged in the science," including the Administrator when he speaks on matters of science "informing an Agency policy decision." The protection is forward-looking and is designed to encourage the employee to express his or her opinion if he or she "disagrees with the scientific data, scientific interpretations, or scientific conclusions that will be relied upon for said Agency

[1] EPA's Scientific Integrity Policy: https://www.epa.gov/sites/production/files/2014-02/documents/scientific_integrity_policy_2012.pdf

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decision."

In his response, the Administrator expressed his opinion regarding contributors to global warming and called for more debate, review, and analysis as a precursor to any future EPA policy decision on the matter. This expression of opinion, which was not made in a decisional context, is fully within the protections of EPA's Scientific Integrity Policy and does not violate that Policy. We also note that the Administrator, in his televised remarks, did not suppress or alter Agency scientific findings.

Questions and Answers:

1. **Who conducted the evaluation of this allegation of a violation of the Scientific Integrity Policy?**

   The evaluation of this allegation of a violation of the Scientific Integrity Policy was made by a panel consisting of the Scientific Integrity Official and Deputy Scientific Integrity Officials from across the Agency.

2. **What criteria did EPA use to evaluate this allegation of a loss of scientific integrity?**

   The Scientific Integrity Review Panel focused its review on the following text in the Scientific Integrity Policy:

   > *When an Agency employee substantively engaged in the science informing an Agency policy decision disagrees with the scientific data, scientific interpretations, or scientific conclusions that will be relied upon for said Agency decision, the employee is encouraged to express that opinion…*

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   The panel concluded that expressing an opinion about science is not a violation of EPA's Scientific Integrity policy.

3. **Did the Administrator or anyone else in the new administration play a role in the evaluation of this allegation?**

   No.

4. **Has the new administration tried to influence or diminish the importance of scientific integrity at EPA?**

   No.

5. **Why didn't Francesca Grifo, EPA's Scientific Integrity Official, respond to the letter?**

   Although Dr. Grifo was an integral part of this process, for health reasons, she was not available to sign the response letter to the Sierra Club.

6. **Why is scientific integrity important?**

   EPA's ability to pursue its mission to protect human health and the environment depends upon the integrity of the science on which it relies. When dealing with science, it is the responsibility of every EPA employee to conduct, utilize, and communicate science with honesty, integrity, and transparency, both within and outside the Agency.

7. **Will policy decisions at EPA continue to be based on sound science?**

   Yes, but it is important to note that when policy decisions are made, other factors are also considered, in addition to considering the underlying science.

8. **What can you tell me about other allegations of a loss of scientific integrity the Agency is working on?**

   Allegations of a loss of scientific integrity are treated confidentially. We do not provide any information about active allegations. Once our assessment is complete, we provide summary information to the interested parties.

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