April 23, 2018

The Honorable E. Scott Pruitt
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Re: Don't Restrict EPA's Ability to Rely on Science

Dear Administrator Pruitt,

As scientists and technical experts, we urge you to cease any plans to restrict the types of science that the Environmental Protection Agency (EPA) can use in regulatory decisionmaking. EPA can only adequately protect our air and water and keep us safe from harmful chemicals if it takes full advantage of the wealth of scientific research that is available to the agency.

Recent news reports[1] suggest that you plan to adopt restrictions on research similar to those contained in two pieces of proposed legislation (the Secret Science Reform Act and the HONEST Act), which have both repeatedly failed to pass Congress for several years for good reason.[2] Multiple major scientific societies repeatedly came out strongly against the legislation at the time. "We urge caution in setting laws that submerge science beneath politics," they wrote.[3]

Proponents for these radical restrictions purport to raise two sets of concerns: reproducibility and transparency. In reality, these are phony issues that weaponize 'transparency' to facilitate political interference in science-based decisionmaking, rather than genuinely address either. The result will be policies and practices that will ignore significant risks to the health of every American.

First, many public health studies cannot be replicated, as doing so would require intentionally and unethically exposing people and the environment to harmful contaminants or recreating one-time events (such as the *Deepwater Horizon* oil spill). Second, there are multiple valid reasons why requiring the release of all data does not improve scientific integrity and could actually compromise research, including intellectual property, proprietary, and privacy concerns. Further, EPA has historically been transparent in demonstrating the scientific basis of its decisions, so the public can hold the agency accountable to establish evidence-based safeguards; any changes should be made with the full consultation with and support of the scientific community.

There are ways to improve transparency in the decisionmaking process, but restricting the use of science would improve neither transparency nor the quality of EPA decisionmaking. If fully implemented, this proposal would greatly weaken EPA's ability to comprehensively consider the scientific evidence across the full array of health effects studies. This would negatively impact EPA public protections that reduce levels of lead, harmful chemicals, and fine particle pollution, among others.

Again, we urge you to stop any plans to restrict the science that EPA can use in decision-making across the board or on any specific issue, and instead to protect the integrity of science at EPA. We stand by ready to help EPA fulfill its science-based mission to protect public health and the environment.

Sincerely,

The undersigned,
985 scientists

Cc:
Matthew Z. Leopold, General Counsel
William Wehrum, Assistant Administrator, Office of Air and Radiation
Dr. Jennifer Orme-Zavaleta, Principal Deputy Assistant Administrator for Science
Neomi Rao, Administrator, Office of Information and Regulatory Affairs

[1] https://www.epa.gov/newsreleases/daily-caller-scott-pruitt-will-end-epas-use-secret-science-justify-regulations
[2] https://blog.ucsusa.org/gretchen-goldman/scott-pruitt-will-restrict-the-epas-use-of-legitimate-science
[3] https://mcmprodaaas.s3.amazonaws.com/s3fs-public/HR%201430%20HONEST%20Act%20Multisociety%20Letter%20of%20Concern.pdf

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