



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

August 15, 2018

The Honorable Andrew Wheeler
Acting Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Transparency in Regulatory Science – Docket ID No. EPA-HQ-OA-2018-0259

Dear Administrator Wheeler:

The Ecological Society of America (ESA) is a professional scientific society composed of over 9,000 professional ecologists. I write on its behalf to strongly oppose the Environmental Protection Agency's Notice of Proposed Rulemaking, "Strengthening Transparency in Regulatory Science," issued on April 30, 2018.

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, 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 other members of the scientific community to evaluate the unintended consequences of this proposed rule. Thank you for your consideration of our concerns.

Sincerely,
Laura Huenneke, Ph.D
President