



National Environmental Health Association

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Our organizations strongly oppose EPA's supplemental notice of proposed rulemaking (SNPRM) to the "Strengthening Transparency in Regulatory Science" proposed rulemaking. Like the original proposed rule, this supplemental proposal would undermine sound science and put Americans' health and the environment at risk. We are deeply concerned with EPA's continued efforts to impede the use of critical science and implore the agency to withdraw the proposal.

If EPA excludes studies or diminishes the consideration of studies because the data cannot be made public, people may be exposed to real harm. The result would be decisions affecting millions based on inadequate information that fails to include well-supported studies by expert scientists.

More troubling, the supplemental proposal goes further than EPA's original proposal by dramatically expanding the scope of the rulemaking. By including "influential scientific information" in addition to significant regulatory actions, EPA's ability to use the best science available is further restricted.

We support improving the transparency of science and access to data. When feasible, scientists should strive for appropriate public access to data to maximize independent validation and trust in the scientific process. However, there are many credible scientific studies where the exposure of raw data to the public is infeasible or would reveal confidential patient information.

The research EPA relies on to make determinations is already transparent in most cases. Many scientific journals and research agencies now have policies governing the sharing of data among researchers and with appropriate access by the public at large.

EPA's efforts with the supplemental proposal are misguided and will not improve the quality of science used by EPA nor allow the agency to fulfill its mandate of protecting human health and the environment. For the sake of the country's health, EPA must not restrict this research.

Due to the urgency and importance of this matter, we urge the EPA to withdraw the "Strengthening Transparency in Regulatory Science" Proposed Rulemaking.

Signed,
Allergy & Asthma Network
Alliance of Nurses for Healthy Environments
American Academy of Pediatrics
American Academy of Physical Medicine & Rehabilitation
American Association for the Advancement of Science
American College of Lifestyle Medicine
American College of Obstetricians and Gynecologists
American College of Physicians
American College of Physicians California Services Chapter
American Heart Association
American Institute of Biological Sciences
American Lung Association
American Medical Association
American Public Health Association
American Thoracic Society
Association of Schools and Programs of Public Health
Asthma and Allergy Foundation of America
Asthma and Allergy Foundation of America - Michigan Chapter
Breast Cancer Prevention Partners
California Thoracic Society Center for Climate Change and Health
Central Virginia Asthma Coalition
Children's Environmental Health Network
Endocrine Society
Fresno Madera Medical Society
Geological Society of America
George Mason University Center for Climate Change Communication
Health Care Without Harm
International Society for Environmental Epidemiology - North American Chapter
MI Air MI Health
Montana Health Professionals for a Healthy Climate
Mothers & Others for Clean Air
National Association of County and City Health Officials
National Association of Pediatric Nurse Practitioners
National Center for Health Research
National Environmental Health Association
National WIC Association
Ninjas for Health
Physicians for Social Responsibility
Physicians for Social Responsibility – Arizona Chapter
Physicians for Social Responsibility - Colorado Chapter
Physicians for Social Responsibility – Greater Boston Chapter
Physicians for Social Responsibility – Iowa Chapter
Physicians for Social Responsibility – Oregon Chapter
Physicians for Social Responsibility – San Francisco Bay Area Chapter
Physicians for Social Responsibility – Tennessee Chapter

Public Health Institute
Sheboygan Ozone Reduction Alliance (SORA)
Tennessee Chapter of the American Academy of Pediatrics
The Michael J. Fox Foundation for Parkinson's Research
The Society of General Internal Medicine
Union of Concerned Scientists
Virginia Chapter, American Academy of Pediatrics
Virginia Clinicians for Climate Action
Washington Thoracic Society