

**SUMMARY OF TESTIMONY FOR THE PUBLIC MEETING OF  
THE SCIENCE ADVISORY BOARD (SAB)  
WRITTEN COMMENTS BY DR. BERNARD GOLDSTEIN ON BEHALF OF THE  
ENVIRONMENTAL PROTECTION NETWORK**

June 5, 2019

EPA held [a two-day public meeting](#) of the Science Advisory Board (SAB) on June 5 and 6, 2019. The SAB heard remarks from EPA Administrator Andrew Wheeler and discussed EPA's proposed [Science and Transparency Rule](#), planned actions on [EPA's 2018 Spring Regulatory Agenda](#), actions related to updating [EPA guidelines for carcinogen and non-cancer assessment](#), a self-initiated SAB project to evaluate the "scientific" aspects of EPA's [co-benefit calculations](#), EPA's proposed [PFAS Plan](#), and proposed [Waters of the U.S.](#) rule. The SAB also heard testimony by phone and in person on agenda topics.

Dr. Bernard Goldstein, former Clean Air Scientific Advisory Committee (CASAC) Chair and former EPA Assistant Administrator for Research and Development, presented testimony about the Science and Transparency Rule and the proposed revision of EPA's cancer risk guidelines on behalf of the Environmental Protection Network (EPN), a non-profit organization comprised of over 450 former EPA employees volunteering their time to protect the integrity of EPA and provide an informed and rigorous defense against current administration efforts to undermine public health and environmental protections.

EPN's testimony highlights a few critical points:

- EPA is unlike the Occupational Safety and Health Administration (OSHA) in that it houses policy, science and technology all within one organization, making it easier for politics to interfere with the independence of scientific judgment. That is why the independent SAB is so critical.
- EPA is unlike the Food & Drug Administration (FDA) because the public is unlikely to volunteer for a double-blind study in which half of them are exposed to a potentially harmful environmental agent. Scientists therefore rely on the web of studies done by others and the independent analysis by external reviews of said studies. Yet again, the SAB is needed to fulfill such a review to guide and confirm EPA's internal interpretation.
- Under the conflict-of-interest rules, knowledgeable EPA-funded scientists presumably would not be allowed to serve in an advisory capacity. Limiting the science and scientists at EPA's disposal would:
  - Limit EPA's ability to anticipate or respond to new problems, something for which SAB's advice would be highly pertinent.
  - Discourage other scientists working on similar topics from serving on the SAB as it would limit their ability to apply for EPA funding.
- The new cancer guidance document must be created with the utmost deliberation and care, taking into account an enormous amount of pertinent new science that has developed since these guidelines were released in March 2005.

The Science Advisory Board is the nation's defense against the continuing destruction of the scientific base for EPA's decision-making. For all of these reasons, the SAB must work to prevent the consensus processes of science being turned into the confrontational processes appropriate for law.