

August 27, 2019

Statement for the Public Teleconference of the Executive Committee of the EPA Science Advisory Board, 8/27/19

Good afternoon and thanks for the opportunity to comment before the SAB today. My name is Genna Reed, and I am the lead science and policy analyst at the Center for Science and Democracy at the Union of Concerned Scientists. *The Center advocates for improved transparency and integrity in democratic institutions, especially those making science-based public policy decisions.*

I urge EPA to give its SAB more time and authority to fully review the broad and sweeping transparency proposed rule. It is too little, too late that the SAB is only now being given the opportunity to review a very narrow part of a rule that would transform how the agency considers science in public health protection decisions. The agency has broken with the spirit of the law and has moved away from established precedent of a functional and constructive relationship with its science advisors.

The EPA failed to make the proposal available to the SAB along with the “relevant scientific and technical information...on which the proposed action is based” upon issuing the rule as required by law and still has not answered a series of questions from SAB members about the rule’s implementation. It is fully within the purview of the SAB to review the whole rule and not just the narrow slice proposed by Administrator Wheeler.

Beyond that, the SAB should also be given access to the scientific justification for the proposed rule and ample opportunity to provide comments before the EPA moves forward with the proposal. It appears that the agency is moving away from using the SAB to conduct full peer reviews of proposals, and toward consultations that are inadequate for rules with sweeping scientific implications like this one. At this point, If the EPA still plans to issue its final rule by the end of this year, any contributions the SAB makes to the rule will come too late to meaningfully inform it.

EPA’s reticence to give SAB the answers it needs to evaluate the rule further exemplifies that this rule presents a solution in search of a problem. The rule as drafted would waste enormous resources, make data more vulnerable to misuse and exploitation, and make it nearly impossible for the EPA to use the best available science to inform mission-critical decisions. We ask that the EPA fully utilize the SAB and, consider its advice on this rule in its entirety. The EPA should not finalize a rule that has not yet been fully reviewed by its premier science advisors and has received substantial pushback from the broader scientific community.