



External Affairs & Communications

Glenn S. Ruskin

Vice President

May 18, 2020

EPA Docket Center
Environmental Protection Agency
Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Docket ID No. EPA-HQ-OA-2018-0259

The American Chemical Society (ACS), which represents 150,000 chemists, chemical engineers, and related professionals, has serious concerns about “Strengthening Transparency in Regulatory Science,” Docket No. EPA-HQ-OA-2018-0259. ACS agrees that government agencies should have clear policies and procedures for providing access to scientific data. However, we firmly believe that the goal of transparency should not impede the use of the best available science in agency decision-making. We respectfully request EPA continue working with stakeholders across the research enterprise to devise a rule that better protects public health, the environment, and transparency.

While the ACS appreciates EPA’s efforts to refine “Strengthening Transparency in Regulatory Science,” we find the proposed modifications show little improvement over the original proposed rule. Many of our previous concerns¹ remain unaddressed, including vague definitions of key terms, potentially capricious Administrator-granted exemptions, and the absence of clear plans to balance making data publically available while protecting sensitive information. We are not alone in these concerns, as many of them have been raised by the Scientific Advisory Board.²

ACS remains concerned that the proposed rule could needlessly limit the use of insightful, comprehensive scientific information in the policy process, ultimately undermining EPA’s mission to protect human and environmental health. As EPA receives the latest round of comments, we request that the Agency revise the rule to ensure clarity, allow the use of best available science, and provide clear, objective standards for researchers and regulators to follow.

Respectfully submitted,

Sincerely,

A handwritten signature in black ink that reads "Glenn S. Ruskin".

Glenn S. Ruskin

¹Previous ACS Comment (attached)

²[https://yosemite.epa.gov/sab/sabproduct.nsf/LookupWebReportsLastMonthBOARD/2DB3986BB8390B308525855800630FCB/\\$File/EPA-SAB-20-005.pdf](https://yosemite.epa.gov/sab/sabproduct.nsf/LookupWebReportsLastMonthBOARD/2DB3986BB8390B308525855800630FCB/$File/EPA-SAB-20-005.pdf)