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August 14, 2018

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

Dear Acting Administrator Wheeler,

On behalf of the Entomological Society of America (ESA) and its over 7,000 industry, academic, and government-affiliated members, I write to encourage you to withdraw from consideration the Environmental Protection Agency's (EPA) proposed rule entitled "Strengthening Transparency in Regulatory Science" (Docket No. EPA-HQ-OA-2018-0259).

The proposed rule represents a significant deviation from the well-established practices that EPA and other federal agencies have employed to generate scientifically informed policies. Implementing this rule may severely curtail the number of air and water quality studies that the agency might use to inform its policymaking as many of these studies rely on confidential patient data. Excluding otherwise valuable research could have far-reaching and negative consequences, including an erosion of the scientific validity of future regulations. Ultimately, such a shift in methodology has the potential to reverse the positive strides EPA has made in improving our air and water quality, leading to an overall decline in environmental and public health.

Increasing transparency in science is a laudable goal, and as a scientific organization, ESA understands that sharing data is critical to the reproducibility of research. Scientific journals have policies in place that allow researchers to regularly share data with one another, thus providing for independent verification without exposing sensitive medical and other personal information to the public. Much of this data—which has been carefully vetted by scientific experts—already serves as the basis for regulations developed by the agency. Implementing the proposed rule would only disrupt a process that has underpinned the scientific integrity of EPA's rulemaking process since the agency's inception.

It is for these reasons that we wish to reemphasize our firmly held view that EPA should engage collaboratively with its external partners in the rulemaking process. ESA has a longstanding relationship with EPA facilitated by a subject matter expert (SME) who serves as a liaison between our organization and the EPA Office of Pesticide Programs (OPP). The exchange of information enabled by this partnership helps to ensure that EPA is generating expertly informed products and services. The agency should continue to leverage such relationships to help inform rulemaking policies that produce regulations based on the best available science.

We urge you to withdraw this proposed rule so that EPA can continue to produce scientifically sound regulations. Thank you for the opportunity to provide input.

Sincerely,

A handwritten signature in black ink, appearing to read "M. P. Parrella". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Michael P. Parrella, Ph.D.

2018 President, Entomological Society of America