



scientists doing the research. Since EPA does not have the authority to grant access to confidential and private research data, this approach would depend on the consent and approval of the scientists and institutions who conducted the research. It is unclear if this is at all possible, as researchers and institutions, in the example of many groundbreaking epidemiological studies, enter into contracts with participants to keep their health and other sensitive information private. It is improbable the researchers would or could alter these legal contracts after studies are concluded to allow individuals selected by EPA to gain access to such protected information, even in a tiered scheme. Thus, this approach would likely exclude many credible and valuable studies, including ones containing private information that EPA has benefited from in the past. It reinforces our ongoing serious concern that this proposal threatens the use of the best available science in its decision-making.

For example, this drastic change means EPA will likely be unable to cite important studies on topics relating to the levels of contaminants in water, air and land; epidemiological studies that describe clinical markers of exposure or effect; and many other studies that are fundamental in understanding and protecting human health. That EPA would risk prohibiting or severely limiting such evidence and research sends a chilling message to the scientific community and risks breaching the confidence of the American public on whether they can trust EPA decisions to protect their health.

Lastly, the supplemental retains the troublesome provision that the EPA Administrator has sole authority to grant exceptions to the rule should he or she want to include a study that cannot meet the rule's standards. This kind of authority does not provide for proper checks and balances with appropriate scientific oversight bodies. Since EPA addresses a wide range of scientific disciplines that intersect environmental and public health policies, this exemption would eliminate the important role that scientific advisors play in the decision-making process.

Given the gravity of these concerns, which are echoed by a chorus of other scientific societies,

Crop Science Society of America  
Ecological Society of America  
Entomological Society of America  
Geological Society of America  
Harvard University  
International Society for Environmental Epidemiology, North American Chapter  
Massachusetts Institute of Technology  
Mathematical Association of America  
Research!America  
Society for Freshwater Science  
Society for Industrial and Applied Mathematics  
Society of Wetland Scientists  
Soil Science Society of America  
Stony Brook University  
University of California, Los Angeles  
University of Colorado Boulder  
Washington University in St. Louis