



# FASEB

Federation of American Societies  
for Experimental Biology

## Representing Over 130,000 Researchers

301.634.7000  
www.faseb.org

9650 Rockville Pike  
Bethesda, MD 20814

July 12, 2018

Tom Sinks, PhD  
Office of the Science Advisor  
Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

RE: [Docket ID No. EPA-HQ-OA-2018-0259](#)

Dear Dr. Sinks,

The Federation of American Societies for Experimental Biology (FASEB) is a coalition of 30 biological and biomedical research associations, representing over 130,000 biological and biomedical scientists and engineers. FASEB strongly opposes the intent of the Environmental Protection Agency's (EPA's) Notice of Proposed Rulemaking (NPRM), "[Strengthening Transparency in Regulatory Science](#)," issued on April 30, 2018.

FASEB supports and encourages federal agencies to use the best available science in the development of policies and regulations. Unfortunately, the EPA NPRM seeks to restrict the use of such data with the potential consequence of reducing, not strengthening transparency, and thus we strongly encourage the withdrawal of the proposed rule.

FASEB supports the goal of improving research transparency and fostering data sharing across the research community and with the public. In fact, federal research agencies – including EPA – and a large proportion of scientific journals adhere to well-established policies regarding data access and sharing. Such policies allow for transparency and independent validation of research findings. However, there are some instances for which it is inappropriate to share raw data, particularly when there is a risk of revealing confidential patient information.

By proposing a rule that would exclude studies for which some underlying data cannot be made public from policy and rulemaking processes, EPA risks making critical public health decisions based on incomplete information, potentially exposing people to real harm. Therefore, FASEB urges EPA to rescind the NPRM and work with the research community to identify a data sharing strategy that fosters transparent utilization of high quality science in the development of agency policies and regulations.

Sincerely,

James M. Musser, MD, PhD