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## The EPA Disbanded Its Office of Science Advisor. Here's Why That Matters.

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Late last week, the EPA announced its intention to get rid of its Office of the Science Advisor (OSA) and bury its functions deep down in another agency office. This move will significantly diminish efforts to coordinate and standardize the way that EPA does science. The administrator will have significantly less access to scientific advice at normal times and during times of crisis. And it will be easier for agency leaders to sideline and politicize science.

E&E News [broke the story](#), and the [New York Times](#), [Bloomberg](#), [CNN](#), and [NPR](#) soon followed. Then, on Monday, the lead lobbyist for Koch Industries took a job as the top political appointee inside the office that is now in charge of science advice and coordination at EPA.

# What the office currently does

The National Academy of Sciences in 1992 recommended that the EPA create a science advisor office to “ensure that EPA policy decisions are informed by a clear understanding of relevant science.” [From NAS:](#)

*It envisioned that the essential function of the science advisor would be to ensure that EPA policy decisions are informed by a clear understanding of relevant science. The panel recommended that the new science advisor advise the EPA administrator, implement a peer-review and quality-assurance program for all EPA science-based products; be a key player when EPA makes a policy decision, ensuring that the science and uncertainties relevant to a policy or regulatory issue are considered; play a key role in evaluating the professional activities of EPA scientists; reach out to the broader scientific community for information; and maintain an appropriate relationship with EPA’s [Science Advisory Board]. The panel suggested that the role of the new science advisor might be somewhat analogous to the role of the general counsel, who will not approve a document destined for an external audience until it is judged legally defensible.*

OSA staff are there to provide science advice to the administrator on the development of public protections and about how to

*The EPA is disbanding its Office of the Science Advisor. By any measure, this is not good news for the agency’s ability to protect public health and the environment. Cartoon: UCS/Jesse Springer*

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respond to crises (including contamination from hurricanes, chemical disasters, and oil spills). They work to standardize scientific practices across different agency departments that develop and communicate science. They investigate allegations of political interference in science. They provide space to address contentious scientific issues. All of this requires them to have direct access to the administrator as well as sufficient authority and stature to influence other parts of EPA.

# How it should work

The science advisor position is currently parallel to the head of the EPA Office of Research and Development (ORD). While the head of ORD has often served as science advisor, this has not always been the case. Administrator Lisa Jackson separated the two roles, which has distinct advantages, including a greater ability to guide scientific work across the agency and investigate violations of scientific integrity within ORD.

The best practice would be to make the science advisor *more* independent from ORD. Instead, they are going in the other direction by burying the science advisor's responsibilities deep within the office. It's highly unlikely that an ORD head is going to allow information to come from within that would put ORD programs in jeopardy.

## Why this change matters

The elimination of the science advisor's office accelerates the decay of the role of science advice within the EPA administrator's office. The administrator needs someone who will tell it to them straight—even if it's not the information they want to hear. Unnecessary layers between the science advisor and EPA leadership can do long-term damage to the agency's scientific capacity, but they're especially harmful during crisis situations when the administrator needs independent scientific analysis fast.

The move further compromises the ability of EPA to standardize and improve scientific practices across the agency. EPA's work on human subjects protection, data sharing, peer review standards, and other best scientific practices will be diminished as their recommendations carry less weight.

Further, the agency's [scientific integrity policy](#) (designed to prevent political pressures on scientists and scientific work) and its implementation will also be



compromised. The scientific integrity officer's ability to investigate allegations of political interference in science within ORD will be considerably more difficult.

## The EPA's response

The EPA claims that the agency is simply streamlining its workforce, and that there will be no reduced access or authority since the current acting science advisor is also the head of ORD. But this is based on several faulty assumptions.

First, it suggests that the science advisor doesn't need a staff. Second, it assumes that there will never be a need to separate the ORD head from the science advisor position. Third, it completely ignores the OSA's cross-organizational functions that will be significantly less prominent and that staff will be left out of important discussions due to rank.

## The context

Unfortunately, the current EPA has consistently left EPA scientific staff out of the conversation on important public health matters. For example, EPA scientists were not consulted when the agency [decided not to ban](#) the brain damaging chemical chlorpyrifos (a decision that was [later reversed in court](#)). The proposal to restrict the types of science that EPA can use in decisionmaking was similarly [hatched by political appointees](#) without the meaningful involvement of agency scientists.

Under disgraced EPA Administrator Scott Pruitt, the [ban on science advice from EPA grant recipients](#), the appointment of multiple industry insiders to high-level policy positions, the removal of climate change information from websites, and so much more has led to an understanding that science doesn't count for much in the current EPA. Some were hopeful that Pruitt's departure would bring changes.

In one of his first days on the job, Acting Administrator Andrew Wheeler met with agency staff and [pledged to include agency scientists in the work of the](#)

[agency](#). Yet this move suggests a lack of interest in unfiltered science advice and strong science standards, which can only make the agency less effective in protecting public health and the environment. The addition of a Koch Industries lobbyist as the liasion between the science office and the administrator’s office only amplifies the concern.

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