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Put Them In, Coach: Why Sidelining the EPA's Science Advisory Board Is a Disservice to Us All

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The EPA's key scientific sounding board, the Science Advisory Board (SAB), will be holding its [first full public meeting of 2019](#) this week. And as Administrator Wheeler's EPA continues to roll back policies that were informed by science or devise new strategies to restrict the way that science is used in agency rulemakings, the committee formed to help review the agency's science should have a very long to-do list.

But as [we've noted before](#), the Trump administration has made it very clear across the board that incorporating independent science advice into its decisions isn't a priority. This has been borne out in the agency [failing to listen to its own scientists](#) on regulatory decisions that affect public health, [suspending or cancelling its own chemical assessments](#), and [banning EPA-funded experts from](#)

advisory committees, which has significantly [changed the composition of its advisors](#). While the SAB exists and has a full membership of over 40 individuals, Administrator Wheeler is now further attempting to strip the SAB of its responsibilities by [narrowing its work](#) to very specific pieces of problematic policy proposals (like [restricted science](#)) rather than charging its members with thorough reviews.

Why does this matter so much? Because the SAB serves an important role of checking the EPA's science on a range of scientific issues—and that check can mean the difference between a policy that's based on the best available science and one that's based on the political whims of former coal and oil industry lobbyists now inhabiting powerful agency positions. Here are just a few examples of what *could* happen if this current SAB doesn't have the chance to meaningfully weigh in on EPA's policies on the table and political appointees continue to make decisions about the science that they have no business making.

- **Restricted Science:** We already know the creation of this proposed rule, which would restrict the science used in public health policy, was a [political maneuver](#) first concocted by the tobacco industry and attempted many times legislatively in order to squash inconvenient science. If SAB continues to be cut out of this process, this policy could be issued without a single check on its scientific basis, on which a [long list of scientific associations have come out in opposition](#). And this failure to charge SAB with reviewing the policy would set a concerning precedent that such policies don't need to be rigorously reviewed by the scientific community. Allowing this rule to make its way as official agency policy would [threaten public health science as we know it](#), erasing evidence of health harms caused by environmental pollutants because EPA isn't allowed to use the science to protect us all.
- **Risk Assessment Guidelines:** There have [been several attempts](#) to change the model used by EPA to evaluate risk of chemical exposure,

including an interest from this administration (and industry) to remove the linear non-threshold model as the default assumption for contaminants. This model assumes that there's no safe level of pollutants, whereas a threshold model assumes that there is a level below which exposure to a chemical is safe. The former is a more protective approach supported by the best available science and is the default assumption within the current cancer guidelines. If the SAB doesn't have the opportunity to review changes to these guidelines, former American Chemistry Council employees now working inside EPA, [like Nancy Beck](#), could write in industry's wishlist of changes to these assessments to change the math used to analyze risks of chemicals, with the goal of making it more likely for the EPA to issue a finding that a chemical is safe, even when it's not.

- **Cost Benefit Analysis:** This administration has [attempted to undermine the way in which EPA counts the ancillary benefits of regulations](#), including avoided particulate exposure in issuing clean air standards. Without SAB review, the agency could choose to ignore the science on the health benefits of avoiding pollutant exposure, changing the math so that the costs of creating important safeguards outweigh the benefits. This would be a great boon to the energy industry looking to continue business as usual, but would be a huge loss for anyone interested in breathing clean air. Alarming, such a move could have wide-ranging impacts on EPA's ability to enact any new public health protection, since many EPA safeguards, from the mercury rule to the Clean Power Plan, rely on EPA's ability to consider all relevant and quantifiable benefits in its rulemaking.
- **PFAS:** The EPA's PFAS action plan issued in February [was light on the so-called action](#). Already, we are incredibly far behind in understanding the scope and scale of the contamination of these [forever chemicals in our water, soil, and food](#). The agency needs to take swift action to protect

us from further contamination and figure out how to clean up the mess made by manufacturers and users of this large class of chemicals. In order to act swiftly and in the best interest of the public, we need the smartest people in the room checking the agency’s decisions. Otherwise, we could be left with “action” determined appropriate and sufficient by people like [David Dunlap](#), now leading the Office of Research and Development, who spent years working for Koch Industries, a parent company of PFAS-user companies like Georgia-Pacific.

While the aforementioned scenarios could play out even if SAB has the chance to review the policies in question, having a group of scientists publicly weigh in on these proposals is an accountability mechanism making it less likely that fringe scientific views find their way into final policy proposals. The bottom line is that the Science Advisory Board was created to serve as a check on the agency’s science. If there was ever a need for that check, it’s now.

I will be attending tomorrow’s meeting, [providing a public comment](#), and tweeting the event from my handle, [@gennareed](#).

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