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May 26, 2018

The Honorable E. Scott Pruitt
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Dear Administrator Pruitt,

I am writing to you today on behalf of the more than 7,000 members of the Entomological Society of America (ESA) to urge you to extend the comment period for the proposed rule entitled "Strengthening Transparency in Regulatory Science" to at least 60 days from its publication date in the Federal Register. ESA is a scientific organization with members that come from all aspects of entomology and the biological sciences, including industry, academia, government, and others.

Increasing transparency in science is a laudable goal, and as a scientific institution, ESA understands that sharing data is critical to the reproducibility of research. Reproducibility, in turn, leads to increased levels of trust and reliability in the research. However, 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 could 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. Given these concerns, a 30-day comment period is insufficient for the public and the scientific community to adequately assess the potential consequences of such a shift in methodology.

ESA believes that rulemaking at EPA benefits through collaboration and engagement with the agency's external partners. ESA has a longstanding and productive 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. Given an adequate amount of time, such a relationship should be leveraged to help craft agency-wide rules that provide for regulations based on the best available science.

We urge you to extend the deadline for submitting comments on this proposed rule so that EPA can continue to work with its external partners to produce scientifically sound regulations. Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "M. P. Parrella".

Michael P. Parrella, Ph.D.

2018 President, Entomological Society of America