

July 16, 2018

The Honorable Andrew R. Wheeler
Deputy Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Reject Proposal for Strengthening Transparency in Regulatory Science (Docket No. EPA-HQ-OA-2018-0259)

Dear Deputy Administrator Wheeler:

On behalf of tens of thousands of members nationwide who are living with and at risk of breast cancer, I am writing to express our **grave concern about the damaging impact the proposed "Strengthening Transparency in Regulatory Science" will have on public health.** Restricting the EPA's ability to use the best available science and public health research in rule-making will weaken public health and environmental protections and may result in more people being diagnosed with breast cancer and other diseases.

Breast Cancer Action (BCAction) is a national education and activist organization that works to address and end the breast cancer epidemic. Each year a quarter of a million women are diagnosed with breast cancer, despite the fact that many of these individuals have no known risk factors and engage in "healthy lifestyle choices." Extensive scientific research shows that environmental exposures to synthetic chemicals may increase the risk of breast cancer.

Since our founding in 1990, we have worked for systemic change to stop breast cancer before it starts by understanding and eliminating the root causes of the disease. We recognize that **the Environmental Protection Agency (EPA) plays an essential role in protecting the public from involuntary exposure to harmful chemicals that may increase the risk of breast cancer and may also interfere with breast cancer treatments.**

High-quality, peer reviewed, public health studies and epidemiological studies provide essential information about environmental health and are key to sound, evidence-based policy. **We are alarmed that the proposed rule would require that in order for a human-health study to be part of the EPA's rule-making about the health effects of a pollutant or chemical, raw study data, including individual medical records, must be publicly available. This would violate people's privacy and be both unethical and conflict with existing privacy laws.**

The EPA should use the best available science to ensure evidence-based rule making that protects public health. Many disciplines, notably medicine, are able to advance knowledge while protecting patient privacy. It is essential that environmental health studies, even those that include protected health information, are available to the EPA in its decision-making.

On behalf of everyone living with and at risk of breast cancer, I urge you to reject this proposed rule that would have a devastating implication for public health and environment policy. Public health and epidemiological research is essential to the EPA's ability to safeguard the public's health and well-being.

Sincerely,

A handwritten signature in black ink, appearing to read "Karuna Jaggar", with a long horizontal flourish extending to the right.

Karuna Jaggar
Executive Director