

May 15, 2020

Office of Science Advisor, Policy and Engagement
Environmental Protection Agency,
1200 Pennsylvania Ave NW, Washington, DC 20460

RE: Docket No. EPA-HQ-OA-2018-0259-9322

Dear Sir or Madam:

The American Farm Bureau Federation appreciates the opportunity to file these comments in connection with the Environmental Protection Agency's (EPA) supplemental notice of proposed rulemaking for the Strengthening Transparency in Regulatory Science Proposed Rulemaking.

AFBF is the nation's largest general farm organization. The farmers and ranchers we represent, in all fifty states and Puerto Rico, are engaged in every conceivable facet of agricultural production. Many of our members are directly affected by EPA's regulatory decisions, from reviewing pesticide registrations to defining navigable waterways to protecting endangered species. EPA's decisions are based on cost benefit analyses often using scientific data from various sources. As many stakeholders are involved in providing feedback throughout the notice and comment period, which shapes the decisions EPA will make, maintaining transparency and accountability throughout this process is critical.

AFBF applauds EPA's actions in the notice of proposed rulemaking and the subsequent supplemental notice of proposed rulemaking which ensure that the regulatory science underlying its actions is publicly available in a manner sufficient for independent validation. While AFBF is not a scientific organization, we find it important to demonstrate our support for increased transparency. The safety of our food supply, stewardship of our land, water and environment, and protection for those living and working on and near farms are all affected by EPA's regulatory actions. EPA's decision to give more consideration to independently verifiable data will ensure that pivotal regulatory actions are based on the best available science and not on questionable figures, potentially derived from biased studies.

AFBF appreciates EPA's efforts to ensure scientific integrity and transparency in its decision-making process and urges the EPA to maintain these provisions as EPA takes steps to finalize this proposed rule.

Sincerely,



Paul Schlegel
Vice President, Public Affairs
American Farm Bureau Federation