

Congress of the United States
Washington, DC 20515

July 28, 2022

Dr. Elizabeth Eide
Executive Director
Division of Earth and Life Studies (DELS)
National Academies of Sciences, Engineering, and Medicine (NASEM)
500 Fifth St., N.W.
Washington, D.C. 20001

Dear Dr. Eide,

The National Academies of Sciences, Engineering, and Medicine (NASEM) has been tasked with establishing a committee to peer review the U.S. Environmental Protection Agency's (EPA) draft 2022 Integrated Risk Information System (IRIS) formaldehyde assessment and issue a report on their findings. There is no doubt that the findings of this report will be consequential to decisions concerning human health, environmental safety, the economy, and federal and state regulatory programs, not to mention potential legal liability. We write to you raising concerns about personnel decisions that could undermine the integrity and reputation that NASEM has steadfastly sought to uphold over the years.

NASEM has long been considered the 'gold standard' with regulators and lawmakers often relying upon the NASEM to do work of the highest scientific standards, buttressed by unimpeachable integrity in both independence and peer review. We are concerned that the flawed panel review process through which NASEM is conducting the formaldehyde review risks losing public and Congressional confidence in the panel, and NASEM as a whole. For instance, evidence suggests that key officials appear to have violated basic standards of independence and bias during the peer review process. Anything less than abiding by the most rigorous and well-established scientific practices to avoid bias – which requires diversity of expertise and independence from the EPA process – could undermine the credibility of the institution and frustrate public trust in NASEM.

As NASEM seeks to retain their reputation as a gold standard institution, we urge you to thoroughly investigate the level of independence of those involved with the ad-hoc committee charged with reviewing EPA's draft formaldehyde IRIS assessment. It is critical that independence from EPA's work is ensured, as part of an objective review process. To achieve this, NASEM should consider a reset of the panel nomination process after a public comment on the charge questions and remove from the process any potentially impartial panel members and/or NASEM staff.

The ad-hoc committee charged with the assessment will play a pivotal role in ensuring EPA's commitment to transparency, responsible risk communication, and best available science. We encourage NASEM to remove all possible implications of impartiality and bias, upholding the integrity and creditability of the peer review process in advancing the mission of NASEM as a non-partisan, unbiased scientific entity. The importance of ensuring public trust in the review process of the highly anticipated draft IRIS formaldehyde assessment cannot be overstated. As an immediate first step, we respectfully request that a NASEM officer be assigned who has no real nor potential conflict of interest with the assessment under review.

Sincerely,



Brian Babin, D.D.S.
Member of Congress



Troy Balderson
Member of Congress



Mike Carey
Member of Congress



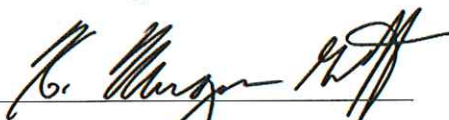
Earl L. "Buddy" Carter
Member of Congress



Michael Cloud
Member of Congress



Jeff Duncan
Member of Congress



H. Morgan Griffith
Member of Congress



Glenn Grothman
Member of Congress



Richard Hudson
Member of Congress



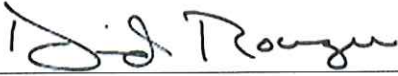
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