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Chairman Ose, Representative Boehlert, members of the Committee, thank you for the opportunity to appear before you today. I am George M. Gray, Acting Director of the Harvard Center for Risk Analysis. My comments today are based upon my research and experience as a scientist, risk analyst, and public health professional. These comments are my own and should not be attributed to the Harvard Center for Risk Analysis or Harvard School of Public Health.

I am here to support the idea of elevating the Environmental Protection Agency (EPA) to Departmental status. EPA's mission "*to protect human health and to safeguard the natural environment — air, water, and land — upon which life depends*" is important to the citizens of our country. Elevating EPA to the highest level of government will recognize the priority given to protection of human health and our natural resources.

Like others, I believe that this transition is also an opportunity to evaluate the ways in which the new Department acts to achieve its goals and measure success. For these reasons I support many of the provisions of Mr. Ose's bill, H.R. 2138. I would like to briefly address two important aspects of this bill, the creation of a Bureau of Environmental Statistics and reorganization of the structure of EPA as it becomes the Department of Environmental Protection.

I am enthusiastic about the development of a Bureau of Environmental Statistics for several reasons. First, it will provide concrete evidence of the effect of efforts to address environmental problems. Second, it will be a useful communication tool for the new Department. Finally, it will provide a means to identify and prioritize emerging environmental challenges. However, we must also be aware that the Bureau will not resolve all of the debates about public health or environmental questions.

Many EPA efforts seek to reduce levels of pollutants in air and water or on land. Without sound data, evaluating the changes that result from new rules it is very difficult to gauge their success. With a proper orientation, a new Bureau of Environmental Statistics will provide information to help the Department measure success that are directly related to the goals of the specific Departmental rules.

Sound environmental statistics will serve a valuable communication function for the new Department. Knowledge of progress in addressing environmental problems can help build support for the Department and help the public see the results from the sometimes difficult or costly requirements placed upon them.

Clearly, the public needs a greater knowledge of the environmental progress made over the last several decades. For example, in a 2002 survey conducted by Wirthlin Worldwide for the Foundation for Clean Air Progress, two thirds of the 1000 American adults asked if they "believe that the nation's air has gotten better or worse in the last ten years" responded that air quality is worse¹. This is in direct contradiction to the facts and should be of concern to the EPA. How can we expect the

¹ http://www.cleanairprogress.org/news/quorum_res_01_14_02.asp

public to support environmental measures that may be inconvenient or costly, like measures to decrease automobile emissions that may increase the cost of cars or fuel, if they don't believe we have made any progress with our efforts over last 10 years? A well-respected and trusted National Bureau of Environmental Statistics can help build support for the Department of Environmental Protection and its efforts and provide information and context for citizens.

Sound data on environmental conditions will also be a valuable tool in priority setting within the Department. It may also aid in looking over the horizon for new and emerging environmental challenges. Making these data widely available, as called for H.R. 2138, will allow others to monitor environmental progress, evaluate the costs and benefits of particular rules, and understand how well the Department is addressing its mission.

We must be humble about what we can learn with an NBES. Many of EPA's rules and regulations focus on reduction of risks to human health. Yet it is extremely unlikely that any effort to gather statistical information on public health will identify changes associated with specific regulations. The risks addressed are just too small. I don't think you could find an epidemiologist or a public health statistician who believes that we could detect any change in cancer rates in a town that reduces levels of arsenic in drinking water to meet the new EPA standard. It is important to be aware of the information the new Bureau can and cannot provide to guide the Department.

The EPA uses risk assessment and management tools to inform many of its important decisions. The Office of Research and Development, EPA's scientific research arm, is explicitly organized around the risk assessment/risk management paradigm. This approach is built upon bringing the best available scientific evidence to bear on a problem to understand its size, severity and management options. Policy decisions, informed by the science as well as economics, engineering, social sciences and other factors, then determine how a risk is to be managed. There is a perception that in many cases policy is influencing EPA's science and use of science to arrive at specific answers in ways that undermine the credibility of both the science and the decisions.

The proposal in H.R. 2138 to restructure the Department of Environment by function would go a long way to improving both the perception and the reality of the credibility of EPA science and decisions. When the science is done on one side of the house, and then injected into the policy process to be considered along with other important factors, it will help remove some of the pressures on scientists to "get the right answer" and will put the decision making responsibility not in the hands of scientists but with policy makers where it belongs.

This significant a change in the structure of the Agency/Department will require further tweaking. Attention to ensure that "science policy" doesn't influence the conduct and interpretation of scientific information will be important. A recognition that engineering and economic analysis are "science" and deserve the same insulation from policy as toxicology and epidemiology will be important. Nevertheless, in the long run, this restructuring may be one of the most important steps we take to meet environmental challenges yet to come.

In closing, as elevation of EPA to departmental status is considered I welcome attention to improving the information available to confront current and future environmental challenges with sound science and environmental statistics. Careful consideration of the opportunities for restructuring is also warranted to build confidence in the science and the decisions that guide our efforts at environmental protection. I applaud your efforts to look forward and equip our country with the tools necessary to ensure wise environmental protection in the future.