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Jane Nishida, Acting Administrator  
Office of the Administrator  
Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460  
*Submitted via email*

Re: Petition for postponement of “Strengthening Transparency” Rule, 86 Fed Reg. 469 (Jan. 6, 2021) pursuant to 5 U.S.C. § 705 Dear Acting Administrator Nishida:

We, the North American Chapter of the International Society for Environmental Epidemiology write to request that you exercise your authority pursuant to the Administrative Procedure Act, 5 U.S.C. § 705, to postpone the effectiveness of the final rule entitled “Strengthening Transparency in Pivotal Science Underlying Significant Regulatory Actions and Influential Scientific Information” (“Rule”) and published at 86 Fed. Reg. 469 (Jan. 6, 2021), pending judicial review. Because the Rule is set to take effect on February 5, 2021 and a section 705 postponement must be put into place *before* the Rule becomes effective, **we request that you take affirmative action no later than February 4, 2021, to postpone the effectiveness of the Rule.**

Please also consider the option of immediately revoking the so-called “Transparency” rule by issuing a Direct Final Rule Making, and simultaneously announcing comment on implementation of the 2016 EPA Plan (601-R-16-005) to increase access to results of EPA-funded scientific research.

The many justifications for the postponement of implementation, or even better, complete withdrawal, of this rule are provided in our earlier May 7, 2020 letter to the prior Administrator, which is attached to this letter.

Sincerely,

George D. Thurston, Chair of the ISEE NA Chapter Policy Committee  
On behalf of the International Society for Environmental Epidemiology, North American Chapter