



University Consortium for
GEOGRAPHIC INFORMATION SCIENCE



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EPA Rulemaking Jeopardizes Utilization of Geospatial Research

There is currently a rule under consideration by the Environmental Protection Agency (EPA) that is cause for major concern within the research community. The proposed [Strengthening Transparency in Regulatory Science](#) rule indicates that as the EPA uses scientific research to guide future policy decisions, preference will be given to studies which make their raw data publicly available. Consequently, this would allow the EPA discretion to discount research that does not fully disclose such data, which includes any findings that draw from personally identifiable medical and location information as well as proprietary data.

The American Association of Geographers (AAG), in partnership with the Urban and Regional Information Systems Association (URISA) and the University Consortium for Geographic Information Science (UCGIS), plans to submit a public comment expressing our opposition to this proposed rule.

While the principles of open data sharing and reproducibility are key to scientific integrity and advancement, certain health and environmental research are only possible when personally identifiable information is guaranteed to remain confidential. As organizations at the intersection of science, industry, and geospatial technologies, we fully appreciate that confidential and proprietary geospatial data, including remotely sensed satellite imagery, location tracking of individual mobility, and georeferenced demographic and health information (which can reveal identity), play essential roles in environmental and health research. We are deeply concerned that by favoring research in which data and models are made publicly available, the EPA will overlook or disregard findings from valid, scientific research.

The rule, first proposed in 2018, was recently modified in reaction to many of the comments originally received. However, the modifications fail to ameliorate the issues identified above.

You can make your voice heard on this proposed rule by [visiting the public comments portal](#) and submitting a response **by the May 18th deadline**. If feeling unsure on where to start, we recommend following [this helpful guide](#) from the Union of Concerned Scientists.

For additional background, watch this November 2019 hearing from the U.S. House Committee on Science, Space, & Technology entitled, [“Strengthening Transparency or Silencing Science? The Future of Science in EPA Rulemaking.”](#)