



# HOW TO SUBMIT A PUBLIC COMMENT ON BEHALF OF LIFE

## STEP 1: CHOOSE A LOCAL EXPERT

- Pokeweed (Legal Consultant)
- Galinsoga (Nutrition Specialist)
- Staghorn sumac (Ecosystem Modeling Researcher Associate)
- Greater celandine (Environmental Health Scientist)
- Broadleaf plantain (Chief Safety Officer)
- Wandering sailor (Heat Stress Researcher)
- Common milkweed (Human-Insect Relations)
- Sticky bedstraw (Rapid Response Soil Protection Manager)
- Mugwort (Rhizome Biologist)
- Lambsquarters (Economist/Impermeable surface remediator)
- Asiatic dayflower (Herbicide Resistance Branch Analyst)
- Princess tree (Heat Reduction and Air Toxicology Consultant)

## STEP 2: DRAFT YOUR PUBLIC COMMENT

**Public Comment** Draft a comment by listening to the species you selected. Go for a walk to find the plant. Listen, move, and allow your writing to be truly imaginative, poetic and scientific by entangling the plant's voice with your voice. We invite you to respond to the US EPA proposed new rule, "Strengthening Transparency in Regulatory Science" which will prevent vital forms of public research, and open the door for corporate and private interests to conduct misleading studies with severe consequences for human and more than human health. Consider what a plant would say:

*Are you stuck? Take some time to be vegetal! How can you listen to your chosen plant expert? Maybe step outside and sit with the plants? You can even look for your plant expert there! Look on edges, on borders, in cracks. Maybe you can move with, breath with, or just sit quietly with it? You might be surprised what you hear!*

## STEP 3: VISIT [WWW.ONBEHALFOF.LIFE](http://WWW.ONBEHALFOF.LIFE) AND SUBMIT YOUR COMMENT TO THE US EPA



Finalize your comment



Post on [www.onbehalfof.life](http://www.onbehalfof.life)



Submit to the US EPA



# ONBEHALFOF.LIFE

A platform developed by the Environmental Performance Agency for submitting comments on environmental justice issues to the U.S. Environmental Protection Agency on behalf of another species, with a focus on amplifying the voices of wild urban plants (aka weeds).

# DECODING THE PROPOSED "STRENGTHENING TRANSPARENCY IN REGULATORY SCIENCE" RULE

## WHAT'S THE PROPOSED RULE?

1

A US EPA regulation intended to strengthen the transparency of EPA regulatory science. The proposed regulation provides that when EPA develops regulations, including regulations for which the public is likely to bear the cost of compliance, with regard to those scientific studies that are pivotal to the action being taken, EPA should ensure that the data underlying those are publicly available in a manner sufficient for independent validation.

3

Docket ID No. EPA-HQ-OA-2018-0259

Source: <https://www.regulations.gov/document?D=EPA-HQ-OA-2018-0259-0001>

1

Critics say [this rule] will permanently weaken the EPA's ability to protect public health<sup>1</sup>

3

Studies including confidential health information have been under attack by industry groups and lawmakers for decades despite no evidence of their flaws<sup>3</sup>

2

Analysts estimate pollution-control measures would save \$20 billion a year in health costs and lives saved<sup>2</sup>

4

EPA's new transparency rule has hidden pro-industry agenda...aimed at preventing epidemiological studies that have highlighted health dangers<sup>4</sup>

## SOURCES

1. Lisa Friedman. E.P.A. Announces a New Rule. One Likely Effect: Less Science in Policymaking. New York Times, April 24, 2018.
2. Dr. Ananya Roy & Dr. Elena Craft. New EPA Science Regulation: A Trojan Horse that Hurts Public Health. Env. Defense Fund. May 1, 2018
3. Juliet Eilperin. Pruitt unveils controversial 'transparency' rule limiting what research EPA can use. Washington Post. April 24, 2018.
4. Warren Cornwall. Critics allege EPA's new transparency rule has hidden pro-industry agenda, Science Magazine. May 1, 2018.

TO LEARN MORE VISIT

WWW.ONBEHALFOF.LIFE

