The Honorable Andrew Wheeler  
Administrator  
Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Dear Administrator Wheeler:

I write today in strong opposition to your Agency’s decision to eliminate the Environmental Laboratory Advisory Board (ELAB) as per President Trump’s Executive Order (EO) 13875.

The American Council of Independent Laboratories (ACIL) is a trade association representing independent, commercial scientific and engineering firms with over 1,000 facilities in the United States engaged in testing, product certification, consulting, and research and development to enhance public health and safety. ACIL’s environmental laboratory members test water, air, soil and other environmental media for a variety of environmental contaminants and represent 80% of our nation’s environmental compliance testing capacity.

Environmental testing is critical to the implementation of programs developed and implemented for ensuring the health, protection, and sustainability of the environment. More specifically, ELAB plays a valuable role by connecting your Agency to the available science and technology resources and informing process considerations that improve the country’s environmental measurement capabilities. The exchange of information occurring at ELAB assists your Agency in the effective identification and quantification of risks to the environment posed by soil and water pollutants in our lakes, streams, forests, cities, and farmland. This allows for an efficient process to provide critical communication on scientific advancements and monitoring needs from well known and recognized experts representing a defined balance of multiple industry stakeholders and affiliates.

It is important to note that the dedicated members of ELAB are volunteers, who are nominated for their expertise by their peer community. While it may appear effective to eliminate a Federal Advisory Committee (FAC) like ELAB in the pursuit of administrative efficiency, this decision is certain to lead to many unnecessary, painfully slow, and wasteful decisions that would historically benefit from this input, resulting in an increased risk to the environment or human health and safety. History has demonstrated that efficient, effective, environmental measurements result in a reduced and more cost-effective administrative decision-making process for the improvement and implementation of environmental regulations.

ACIL values ELAB as both useful and cost effective in the administration of the country’s environmental regulations. With the above-mentioned in mind, I respectfully request that you consider reinstating the ELAB FAC. Thank you for your time and attention regarding this matter and request. I look forward to your response. Please do not hesitate to call upon me if you have any questions.

Sincerely,

Judith R. Morgan, MS, REM  
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