

## Anonymous - Comments

EPA Inspector General's highly critical report investigating EPA's review of external data for the GHGs endangerment finding. On December 15, 2009, EPA published its Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act. As the primary scientific basis for EPA's finding, the Agency relied upon assessments conducted by other organizations.

Agencies' reliance on the IPCC is A VIOLATION of the Data Quality Act, (The DQA directs the Office of Management and Budget (OMB) to issue government-wide guidelines that provide policy and procedural guidance to Federal agencies for ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by Federal agencies. See Data Quality Act 515, 42 U.S.C. 502-504.

IPCC is an international body outside the jurisdiction and oversight of the United States Congress. Moreover, EPA is the entity of the United States government that is seeking sweeping regulations on the basis that GHGs are increasing global temperatures.

EPA's reliance on the IPCC violates the Agency's own internal policy. ( see Peer Review Advisory Grp., Addendum to: Guidance for Evaluating the Quality of Scientific and Technical Information, EPAS SCI. AND TECH. POLICY COUNCIL (Dec. 2012),. IPCC relied on data from a University of East Anglia CRU , in England.

Note History : IPCC Established in 1988, IPCC stated working Group I, stated a Special Committee, Dr John Houghton prepared Scientific Assessments, First working group rely on the Carnegie Institution SCOPE 29 report of 1986 The Greenhouse Effect, Climatic Change and Ecosystems ; Scientific Assessment, Working Group I has built on this. First draft of Policy Makers in Edinburgh 1990, Meteorological office in Bracknell, England, was responsible for organizing , .Members of the team included CHINA , Professor Cao Hong Xing..AND , Financial support for the Bracknell, England core team was provided by the Departments of the Environment and Energy in the UK. The Staff of University of East Anglia CRU , England had been heavily involved in the IPCC assessments, and CRU's work has been used by IPCC in construction of future climate projections.

EPA's Technical support document Peer Review Methodology DID NOT Meet OMB Requirements for Highly Influential Scientific Assessments. EPA had the TSD Technical support document reviewed by a panel of 12 federal climate change scientists.

EPA's disposition of the findings were NOT made available to the public as would be required for reviews of highly influential scientific assessments.

EPA panel of scientists DID NOT fully meet the independence requirements for reviews of highly influential scientific assessments because one of the panelists was an EPA employee.

DID NOT Include language in its proposed action, final action, or internal memoranda that identified whether the Agency used influential scientific information or highly influential scientific assessments to support the action.

EPA Office of Air and Radiation also DID NOT certify that the supporting technical information was peer reviewed in accordance with EPA's peer review policy.

EPA DID NOT contemporaneously document how it applied and considered the assessment factors in determining whether the IPCC and other assessment reports were of sufficient quality, objectivity, utility, and integrity

EPA DID NOT maintain a record of its response and disposition of comments for the two Technical support documents that accompanied the proposed and final rules.

EPA DID NOT discuss whether IPCC procedures required a description of the credentials and relevant experiences of each peer reviewer.

In November 2009, subsequent to publication of EPA's proposed finding, approximately 1,000 e-mails were hacked from the servers of the University of East Anglia CRU , in England, and made public. CRU is recognized for its climate change research and, since 1978, had developed and maintained a land-based temperature record widely used by climate change researchers. According

to CRU, its staff have been heavily involved in the IPCC assessments, and CRUs work has been used by IPCC in construction of future climate projections. The content of the e-mails caused some to challenge the work of CRU and the conclusions of the IPCC. Since EPA relied heavily upon IPCCs AR4 in developing the TSD for its endangerment finding, concerns have been raised about EPAs acceptance and use of this information in light of federal and Agency information quality guidelines. April 2010 study, chaired by Professor Ron Oxburgh, examined; noted that there were unresolved questions relating to the availability of environmental datasets. Further, the Russell report found that both CRU scientists and the University of East Anglia failed to display the proper degree of openness regarding their research.