

[Posted in docket April 29, 2015]

Comment

The proposed "criteria/qualifications" are good individual qualifications necessary for the panel, but the list proposed by EPA does NOT include criteria addressing the composition of the panel in terms of interests and perspectives.

We suggest that EPA add a requirement for panel composition to function in addition to the individual panel member criteria stated in the draft. Consider adding the following: "The panel composition will be balanced, representing a full range of industry, environmental and social perspectives." We also suggest that EPA add a methodology statement about how the panel will function, what processes will be used to seek consensus among panel members, and how decisions will be made. We encourage the EPA to make sure that environmental, social, and economic interests have equal voting power in decision-making.

Additionally, we encourage the EPA to add to the existing list of panel member criteria that panel members should be solution-oriented and be able to advocate for leadership in the standards.

Thank you for the opportunity to participate.

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