

October 4, 2019

President Donald J. Trump  
The White House  
1600 Pennsylvania Avenue NW  
Washington, DC 20500

**Re: Rescinding the Executive Order on Evaluating and Improving the Utility of Federal Advisory Committees**

Dear Mr. President:

The undersigned organizations are writing to ask that you rescind the Executive Order on Evaluating and Improving the Utility of Federal Advisory Committees.<sup>1</sup> By requiring elimination of one-third of existing advisory committees and capping the total number of committees at 350, the order would arbitrarily eliminate essential advice that informs government decisionmaking. Its rationale is specious, and its impacts would be severe.

It is reasonable for each agency to assess its own advisory needs on regular basis, which is why this is already done by agencies as required by the Federal Advisory Committee Act and tracked by the General Services Administration.<sup>2</sup> The order does not explain why this existing process is insufficient, nor justify its apparent assumption that one-third of existing committees are no longer necessary and that the government does not need more than 350 advisory committees.

The justification for this order is to reduce costs to the government, but advisory committees provide substantial value to agencies for costs far below those of hiring additional staff or contractors to perform the duties they fulfill. Agency staff run a few meetings per year and compensate committee members for economy-class travel and other small expenses incurred. Gathering premier experts who volunteer their time to deliberate on pressing matters is a bargain for taxpayers. Further, there is no evidence to support that cutting advisory committees will result in fewer agency costs. To the contrary, a GAO report examined the costs before and after President Clinton's 1993 executive order that cut committees and found that while the number of advisory committees declined during the four years after the order, the costs increased by four percent.<sup>3</sup> A case can and should be made for committees to be sunset once their charges are complete, but the costs of running active committees are small compared to the valuable advice they provide to the agencies they serve.

Reaching a goal of 350 total committees across the government is an arbitrary number that will not help our agencies ensure that policies are based in science and respond to public need and its research programs are doing the highest quality work possible. For agencies like the U.S. Department of Health and Human Services, cutting one-third of discretionary advisory committees means that it will have to choose between a range of active public health needs, from infant mortality to sickle cell disease. Similarly, the Environmental Protection Agency will have to make difficult decisions, such as between a committee studying how best to protect children's health or one that focuses on environmental justice issues.

---

<sup>1</sup> <https://www.whitehouse.gov/presidential-actions/executive-order-evaluating-improving-utility-federal-advisory-committees/>

<sup>2</sup> <https://www.govinfo.gov/content/pkg/USCODE-2012-title5/pdf/USCODE-2012-title5-app-federalad.pdf>

<sup>3</sup> <https://www.gao.gov/assets/110/107157.pdf>

The value of our government's federal advisory committee infrastructure cannot be overstated. Scientific and technical advisory committees provide independent reviews of the evidence and debate issues ranging from the best way to minimize exposure to lead from drinking water to understanding how best to collect information as a part of the U.S. census.<sup>4</sup> Other committees offer advice on policies and provide an avenue for agencies to receive feedback from key stakeholder groups, such as women serving in the armed forces<sup>5</sup> or agriculture and rural communities.<sup>6</sup> The process by which advisory committees operate provides avenues for all stakeholders to give input on agency actions, as all advisory committees hold open meetings with public comment opportunities. The federal advisory committee process is an important and unmatched venue for transparent deliberations on federal matters that gives members of the public the opportunity to observe and hold agencies accountable.

The removal of advisory committees across the government without a compelling rationale is a threat to a vital independent source of information and deliberation. It will undoubtedly result in a net loss of independent expert capacity and institutional knowledge and leave important work unfinished or underdeveloped. Further, it will result in fewer opportunities for the public to participate in agency decision making and weigh in on issues that impact them directly. We urge you to rescind this executive order in order to preserve this vital advisory committee network and uphold public trust in the integrity and rigor of government decisions.

Sincerely,

Acadia Institute of Oceanography  
American Federation of State, County and Municipal Employees (AFSCME)  
American Federation of Teachers  
American Littoral Society  
American Public Health Association  
American Statistical Association  
Asian Pacific American Labor Alliance  
Campaign for Accountability  
Campaign for Youth Justice  
Center for Auto Safety  
Center for Biological Diversity  
Center for Global Development  
Center for Progressive Reform  
Center for Science in the Public Interest  
Citizens for Responsibility and Ethics in Washington (CREW)  
Climate Science Legal Defense Fund  
Coalition for Disability Health Equity  
Conservation Law Foundation  
Consortium for Ocean Leadership  
CUNY School of Public Health, affiliation only  
Defenders of Wildlife  
Electronic Privacy Information Center  
Environmental Defense Fund  
Environmental Protection Network

---

<sup>4</sup> <https://www.census.gov/about/cac/sac.html>

<sup>5</sup> <https://dacowits.defense.gov/About/Charter/>

<sup>6</sup> <https://www.epa.gov/faca/frrcc>

Federal Managers Association  
Food & Water Watch  
Friends of the Earth  
Georgetown University  
Government Accountability Project  
Government Information Watch  
Greenpeace USA  
Inland Ocean Coalition  
International Brotherhood of Electrical Workers  
International Chemical Workers Union Council (ICWUC)  
International Marine Mammal Project of Earth Island Institute  
Jacobs Institute of Women's Health  
Johns Hopkins Center for a Livable Future  
Milwaukee Riverkeeper  
Montana Organic Association  
National Federation of Federal Employees  
National LGBTQ Task Force  
National Nurses United  
National Security Counselors  
National Sustainable Agriculture Coalition  
Natural Resources Defense Council  
New England Aquarium  
New England Farmers Union  
NY4WHALES  
Ocean Conservancy  
Ocean Conservation Research  
Oceana  
Oceanic Preservation Society  
Open the Government  
Oregon Tilth  
Pacific Environment  
PhilaPOSH  
Project On Government Oversight  
Protect Papahānaumokuākea Coalition  
Public Citizen  
Public Employees for Environmental Responsibility  
Revolving Door Project  
Rural Coalition  
SafeWork Washington  
Saunders Hotels  
Save Our Shores  
Senior Executives Association  
Service Employees International Union (SEIU)  
Seven Circles Foundation  
Union of Concerned Scientists  
University of Illinois at Chicago School of Public Health  
University of Minnesota

University of North Carolina, Chapel Hill  
Virginia Association for Biological Farming  
Whale and Dolphin Conservation

Cc: Mick Mulvaney, Office of Management and Budget Director