



Union of Concerned Scientists
Citizens and Scientists for Environmental Solutions

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Committee on Science and Technology,
U.S. House of Representatives
Hearing on “EPA Library Closures: Better Access for a Broader Audience?”
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Good morning, my name is Francesca Grifo. I am a Senior Scientist and the Director of the Scientific Integrity Program at the Union of Concerned Scientists, a leading science-based nonprofit working for a healthy environment and a safer world. Chairman Miller, Ranking Member Sensenbrenner, and Members of the Subcommittee, thank you for the opportunity to share our work and concerns regarding the closures of libraries at the Environmental Protection Agency.

Introduction

In summer 2006, the EPA closed or reduced access to parts of its network of 27 libraries, thereby reducing the public’s ability to use to a valuable source of information and making it more difficult for hundreds of EPA employees to do their jobs of protecting human health and the environment. EPA officials claim the closings are part of a modernization plan, and that all library materials will eventually be available online. Unfortunately, the process adopted by the EPA for modernizing the library system was backwards and mostly non-transparent to stakeholders concerned about the ability of the EPA to do its work. We do not object to modernization per se, rather to the woefully dysfunctional way the EPA sought to undertake it.

The Scientific Integrity Program at the Union of Concerned Scientists works to expose political interference in the work of federal government scientists and to push for reforms that ensure the free flow of scientific information between the government and the public. We recently released a statement entitled “Scientific Freedom and the Public Good” that outlines the conditions needed by federal scientists to do their jobs and serve the public good. Quality research support systems, such as libraries, are a necessary condition for a thriving scientific enterprise at federal agencies.

In order to fulfill its mission to protect human health and the environment, the EPA must rely on accurate, up-to-date scientific information as well as the findings of earlier studies. Scientists build their research on the findings of those who came before them. Libraries are the source of much of this intellectual wealth. To make the best scientific determinations, scientists need access to information regarding the health effects of toxic substances, records of environmental change over time, impacts on specific regions or communities and many other issues. Despite the increasing availability of information on the Internet, world-class academic institutions are maintaining and expanding their libraries with the understanding that such institutions are the bedrock of scholarship and scientific research. Without ease of access to information, the

efficiency and accuracy of EPA's scientific determinations are under threat— with potentially serious consequences for public health and the environment.

We have been concerned about the fate of the EPA Libraries since the closures were first announced. Once the closures began in the fall of 2006, we mobilized our network of scientists—activists who signed our scientist statement on scientific integrity—to call administrator Stephen Johnson's office and demand a halt to the closures.

Over the course of several weeks UCS activists made nearly 8,000 phone calls to EPA headquarters. We believe that this outcry from the scientific community, together with attention from both the House and the Senate, the EPA employee unions, the library community and other non-profit organizations was instrumental in convincing the EPA to stop and reassess its plan for the library network. Since that initial flurry of activity, we have continued to monitor the situation and have met twice with officials in EPA's Office of Environmental Information (OEI) to voice our concerns.

Despite these meetings, in the 14 months since our phone offensive, we have seen very little progress in repairing the damage already done to the library network. Our main concern continues to be that the EPA libraries are a valuable and cost-effective resource for both the agency and the public, and that the system that currently replaces them is sadly inadequate.

Survey Results

To assess the impact of the library closures on EPA's workforce, UCS surveyed scientists at the EPA in July of 2007. The survey results show:

- 555 scientists (35.6 percent of survey respondents) agreed or strongly agreed that the “recent changes and closures in the EPA library system have impaired my ability to do my job.”
- This opinion was especially prevalent among scientists in Regions 5, 6 and 7, which had their libraries closed. 86 scientists, or nearly half of the survey respondents, agreed, however the impact of the closures was felt across the entire EPA.

A number of EPA scientists also provided written comments on the library closures. One scientist stated “The library must also be re-opened. Since its closure, some journals are just no longer accessible.” Another explained why libraries are necessary, saying “EPA program offices [...] use a lot of scientific information. Reduced library access is crippling” while yet another called the loss of library facilities “ludicrous.”

Other quotes from EPA scientists include –

- “Give us back our library.”
- “Re-open libraries.”
- “Restore the libraries.”
- “Libraries with the technical support staff should be restored.”

- “Bring back the two EPA libraries at Headquarters that were closed. Many journal articles are now available online, but these go back only about 20 years. Unfortunately, a large number of bound journals from the collection were discarded.”
- “The ... loss of EPA libraries are bleeding down the EPA's technical knowledge base and our ability to provide or share the skills and knowledge that are critical to overall mission success.”
- “Proper facilities, including re-establishing EPA's network of libraries is essential to give staff sufficient access to information.”
- “Restore ... library and other research resources...”
- “Have access to tech resources and in a timely fashion (includes library/lit search issues).”
- “Stop slashing services that made the EPA what it was (library closings are just one of many ...).”
- “Give us back our library ...”
- “Better support for ORD, libraries (regional and others) ...”

In addition some scientists described progress:

- “BTW - while I loved the library, the new service that was set-up for requesting materials via the internet is great, quick and responsive.”
- “The RTP Interlibrary Loan facility has been very good in obtaining articles and pages in books as the need has arisen.”

These results show that, contrary to the EPA’s claims, the libraries are an important resource for EPA employees and that the Interlibrary Loan service is an imperfect replacement, that may work for certain employees, but not for all.

A Backwards Process

The process by which EPA closed the libraries was backwards. The closing of the physical library should be the *very last* stage of a well-thought-out modernization plan, if and only if it is determined that the physical library is truly extraneous. Unfortunately, closing the EPA libraries was the first step and the driver of all subsequent decisions. UCS supports the digitization of those EPA documents that can legally be made available on the Internet, but again that process should be complete before the physical materials are discarded or placed in a repository. Thousands of EPA documents are currently stranded in digitization limbo for the indefinite future.

Furthermore, digitization cannot fully replace all the resources provided by a physical library. Essential resources, such as copyrighted reference books and older volumes of scientific journals, cannot be reproduced online yet are potentially invaluable for the day-to-day work of EPA’s scientists. The Interlibrary Loan system is a possible solution for some of these problems, but it is undoubtedly slower than a local library and, for commonly used materials, considerably less efficient. Nor do interlibrary loans replace browsing or the spontaneous informal learning that takes place in a library.

Our survey indicates that the current system is not meeting the needs of hundreds of EPA scientists. The EPA should carry out a comprehensive, transparent assessment of the information needs of its staff to determine which locations have a need for a full-service library, which need basic reference collections and which can make do with the current system. EPA's library specialists are valuable resources in their own right and their expertise in answering research and reference questions has been shown to save the EPA millions of dollars of staff time. Any information needs assessment should consider the best way to provide access to EPA librarians to all of EPA's staff.

Changes to the library system impact the wider public and the information that is available to them. The EPA libraries are used by community environmental justice groups, historians, independent researchers, and others. Any changes to the library system should be done in a fully transparent and open manner and the EPA should solicit comment from the various stakeholder groups with an interest in the library network.

Finally – all of this has taken far too long. Almost a year and a half is too long to be without these critical materials.

Outstanding Questions

After two meetings with OEI officials, many questions remain about the future of EPA's library network:

- What is the current status of the digitization process? When will all the unique documents be available?
- Copyrighted material can never be part of the EPA's digital library. While an interlibrary loan system will address some of these needs, it may not efficiently address the needs of all EPA staff. EPA officials have told us skeletal reference collections might be restored in each region. Has this happened? If not, when will it happen? Will stakeholders be involved in decisions regarding the composition of these collections?
- The EPA's own internal documents highlight the monetary savings derived from having trained professionals assist staff. Have librarians been lost? Will the general public be allowed access to librarians when the closed libraries reopen? In the interim? If so, how and when?
- What level of access is currently available for all materials moved to the repositories, including older documents, documents on microfilm and documents generated by EPA contractors? When will full access be restored?
- Have adequate provisions been taken to ensure access for people with disabilities?
- What level of access will the public have to materials in the repositories?
- Will the OPPTS chemical library be re-opened? Are there plans to digitize the materials from that library and make them available online? Will those materials be available through the repositories and Interlibrary loans? If so when?

Solutions

While we believe it is possible that senior library officials do seek to remedy the situation and address these questions, it has been seventeen months since the closures began. Large problems persist and no specific timeline for addressing them has been put forth. Congress has allocated funds to re-open some of the closed libraries, yet it remains unclear how long that process will take. The Union of Concerned Scientists urges this committee to continue its oversight of the EPA until adequate access to EPA library materials is consistently available to EPA employees and the public.

Immediate Actions

Regardless of the timing and manner of the eventual re-opening of portions of the library network, there are three actions that must be taken by the EPA immediately:

- **A basic reference collection should be restored to scientists in Regions 5, 6 and 7, EPA Headquarters and the Office of Prevention, Pesticides, and Toxic Substances (OPPTS).** The contents of these collections should be determined by a quick assessment of the needs of scientists and research groups in those regions. This is not a replacement for a more comprehensive assessment, or for the possible re-opening of those libraries, but is instead a stop-gap measure to provide the necessary resources for EPA employees in the meantime.
- **The EPA must set a firm deadline for completion of the digitization of all EPA documents and meet it.**
- **The EPA must commit to full public access to EPA's informational holdings.** At a minimum this should include making materials available through OCLC and Interlibrary Loan and providing staffing and hours when members of the public may access materials in all the repositories.

Transparency of Library Decisions

- The EPA should open up its decision making process regarding agency informational needs to public scrutiny. Information on plans for the library network should be available on the EPA's website and should include timelines for digitization and access to information, details on the digitization process, and the names of responsible parties.

Stakeholder Consultations

- The EPA should undertake a comprehensive assessment of the information needs of its workforce, including scientific and legal staff, and should design its library modernization plans with those goals in mind.
- The EPA should also routinely consult with outside stakeholders, including community groups, independent and academic researchers, and the library community, to ensure that decisions regarding its library network conform to best practices and ensure continued public access to information.

Whistleblower Rights

- In passing reforms to the Whistleblower Protection Act that include significant protections for government scientists, the House of Representatives has sent a strong signal that scientific openness and access to information should be core agency values

and that scientists who speak out deserve protection. The staff of the EPA should have the right to publicly raise their concerns about the loss of the libraries.

We look forward to working with the 110th Congress on bipartisan legislation and other reforms to restore scientific integrity to federal policymaking.