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To: Mabel E. Echols OMB_Peer_Review/OMB/EOP@EOP
cc:
Subject:

The Office of Management and Budget should withdraw the proposed Bulletin and engage the scientific community in an open process.

Why?

-- There is no evidence that the current system is not working. Not a single example has been raised demonstrating inappropriate or flawed federal regulations being promulgated as a result of failure to peer review.

-- There currently exist many models of scientific peer review in government agencies. The authors of the OMB proposal make no attempt to examine this extensive experience and see what works well (and what doesn't), and on that basis determine if changes are needed.

-- The OMB Bulletin is unclear and confusing on many points. It is likely, however, that implementation of the proposal will lead to delay, increased and unfunded costs, and confusion. There has been no assessment of the costs of the proposed Bulletin in terms either of diversion of agency resources or delayed regulatory protection.

-- It will be difficult to obtain independent, knowledgeable peer-reviewers to review the large numbers of documents, many of which will contain no new science. The new demand for peer reviewers is likely to have negative consequences on the already strained peer review systems utilized by many agencies.

-- The proposal's conflict of interest requirements appear to be written in a way that will preclude the participation of academic scientists whose work is supported by federal funding, but not exclude industry scientists who work for

regulated parties.

-- The proposal appears to exempt a large proportion of regulatory documents where the science emanates from the regulated industry, where the science is in most need of peer review.

-- The proposal also exempts foreign affairs and national defense from peer review, although scientific peer review in this realm would be valuable in many instances. There is no need for a blanket exemption for national defense issues, as a case-by-case national security exemption policy could handle any security-sensitive issues. The exclusion of these areas from the peer review proposal suggests that the objective of the proposal is not to improve regulatory science but rather to hamper environmental and public health protection.

-- If implemented, this proposal would have numerous not yet known and perhaps unintended consequences. For example, as the Bulletin is currently written, the critical decision whether to release information to the public without further review in the event of a public health emergency is removed from the public health agencies and transferred to an OMB administrator.

-- Centralizing authority for regulatory scientific peer review in the Office of Management and Budget, an office with few scientists and whose workings are particularly opaque, opens the potential for behind-the-scenes intervention to change policy under the guise of questioning the science.

Therefore I must ask the Office of Management and Budget to withdraw the proposed Bulletin.

Thank you very much.

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