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

cc:

Subject: comments on OMB peer review policy

Dear Mr. Bolten,

I am writing to express my concern over the proposed OMB Bulletin on peer review and information quality. As a certified professional ecologist I subscribe fully to the need for open and clear peer review of science prior to publication or application to policy. This is a realm in which the scientific community needs to be fully engaged, and there are existing avenues that will allow this debate to occur through an open and transparent process. I urge you to withdraw the Bulletin. There is no evidence that the current system is not working.

At least two parts of the document strike me as especially worrisome. It appears the conflict of interest requirements are 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. While I have no problem with industry scientists becoming more involved in peer review (if they are not already part of the process), a great many highly qualified scientists would therefore be unable to engage in the constructive criticism that drives peer review, and this will slow down the whole process. And then, in apparent conflict with the whole idea of producing the best science, the proposal appears to exempt a large proportion of regulatory documents where the science emanates from the regulated industry, where many would argue the science is in most need of peer review. I do not see that this will serve the public interest, and may instead lead to adverse impacts on human and environmental health.

Thank you for your consideration,

Jill S. Baron, Ph.D.

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