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To: Mabel E. Echols OMB_Peer_Review/OMB/EOP@EOP
cc: Garber.Jonathan@epamail.epa.gov, bstubblefield@parametrix.com, rparrish@setac.org
Subject: proposed OMB bulletin

Please note that I have submitted the comments below strictly as an individual scientist involved in environmental research in support of EPA's regulatory function, not as a representative of either the Environmental Protection Agency or the Society of Environmental Toxicology and Chemistry. My comments should not be interpreted as reflecting policy of either the Agency or the Society.

Joshua B. Bolten, Director
Office of Management and Budget
725 17th Street, N.W.
NEOB Room 10201
Washington, DC 20503

Mr. Bolton,

I write to you today to express my grave concern and doubts regarding the proposed OMB bulletin regarding Peer Review and Information Quality. I am a research chemist in the U. S. Environmental Protection Agency Office of Research and Development's National Health and Environmental Effects Research Laboratory, and a member of the Board of Directors of the Society of Environmental Toxicology and Chemistry (SETAC). As a scientist, and one employed by the government in support of the regulatory process at that, I am keenly aware of the value of the peer review process; in the field of scientific literature, it is absolutely requisite. I am also aware, however, of the amount of extra time and effort the process can and usually does entail, and thus I am concerned that implementation of the proposed guidance, rather than realize benefits of peer review of science involved in regulatory topics, will in fact produce a barrier to dissemination of valuable scientific and technical information. I am concerned that the process, as described, will lead to delays and increased (and most likely unfunded) costs for large numbers of documents, many of which will contain no new science, or even no science at all. Conflict of interest requirements in the proposal would seem to preclude participation of academic scientists, since many have work is supported by federal funding, while not excluding industry scientists who work for regulated parties and may have vested interests in the review. In fact, the proposal appears to exempt a large proportion of regulatory documents where the science emanates from the regulated industry; I would submit that in these areas, the science is most in need of peer review. The requirements and exclusions are likely to make it difficult to obtain independent, knowledgeable peer-reviewers to review the large numbers of documents, and have negative consequences on the already strained peer

review systems utilized by many agencies. And I would most strenuously object to putting authority for regulatory scientific peer review within the Office of Management and Budget, an office with little/no scientific expertise.

In short, I ask that the Office of Management and Budget withdraw the proposed Bulletin and engage the scientific community in an open, transparent dialogue on how to best design and implement a useful, but limited, peer review process.

Yours sincerely,

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