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

cc:

Subject: Comment on the OMB Bulletin "Peer Review and Information Quality"

Dear Joshua B. Bolten, Director, Office of Management and Budget,

The Office of Management and Budget should withdraw the proposed Bulletin and engage the scientific community in an open, transparent process involving the National Academy of Sciences.

I am an Associate Professor of agroecology in the Department of Horticulture at Cornell University. I have conducted research aimed at improving nutrient retention in agricultural systems for 15 years. In the course of my research, I have provided information to various regulatory agencies and I expect that this trend will continue.

I am very concerned about the proposed policy of peer review that is being considered by the OMB. There currently exist many models of scientific peer review in government agencies. It appears that the authors of the OMB proposal made 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.

I am especially concerned that 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. This could result in serious problems in the health and agricultural areas where many new substances need to be evaluated for impacts on human and environmental health. Past events in the development of new agricultural chemicals clearly shows that industry cannot conduct their own research on new products due to conflict of interest issues.

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.

I concur with the conclusion expressed by many research scientists. This proposed OMB Bulletin "Peer Review and Information Quality" is fundamentally flawed in its intent as well as content. Implementation in its current form would serve little value; its costs will be substantial, and its benefit, at least to the public's health and environment, will likely be negative.

Recognizing that peer review of science in the regulatory context is an important process, the scientific community should be engaged in this discussion. The National Academy of Sciences is an appropriate forum for

such a discussion. The Academy has issued several important reports on agency peer review, as well as on broader issues relating to the role of science in regulation. The OMB should withdraw the proposed Bulletin and engage the scientific community in an open, transparent process.

Sincerely,

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